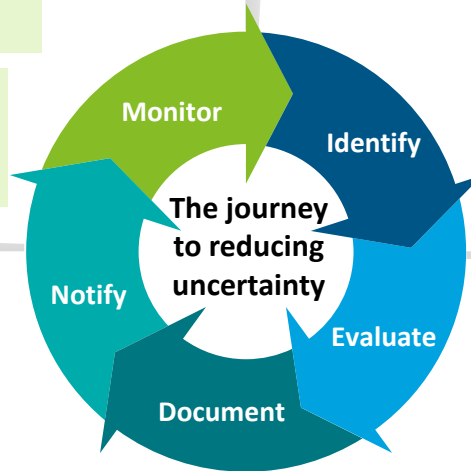


The regime in overview

Scope	UK turnover of more than £200 million and/or a UK Balance Sheet total of more than £2billion (either alone or as part of a group)
Notification criteria	A provision in your accounts that reflects the possibility that a different tax treatment will be applied OR a position different to HMRC's known view
Threshold test	A tax advantage of at least £5million is obtained as a result of the uncertain tax treatment
Notify	Where a return is required to be submitted on or after 1 April 2022 and has a uncertain tax position, you must notify this position to HMRC. The notification deadline depends on whether the position is taken in an annual or non-annual return
Exemptions	You are exempt from notifying an uncertain tax treatment if: <ul style="list-style-type: none"> • HMRC are already aware of the treatment • The tax treatment relates to Group transactions, subject to conditions

Regime uncertainty

Scope	HMRC's known position	Monitoring
There is ongoing uncertainty – e.g., for Employment Taxes around what HMRC considers to be inside the scope of the regime.	Not knowing HMRC's current view of the law could lead to a failure under the regime	Positions and judgements need to be monitored on an ongoing basis as HMRC's view may change
A process for new and existing transactions	The BRR+ Risk Assessment	Penalty geared regime
A process is needed to identify, evaluate, document, monitor and notify transactions - this process must cover new and existing arrangements	HMRC is likely to want to understand what controls and processes you have in place to comply with the regime, which could impact your BRR+ rating	Penalties of up to £50,000 may be charged on the company
		Regime complexity
		The rules do not have an "avoidance" filter and so entirely commercial transactions may need to be notified.



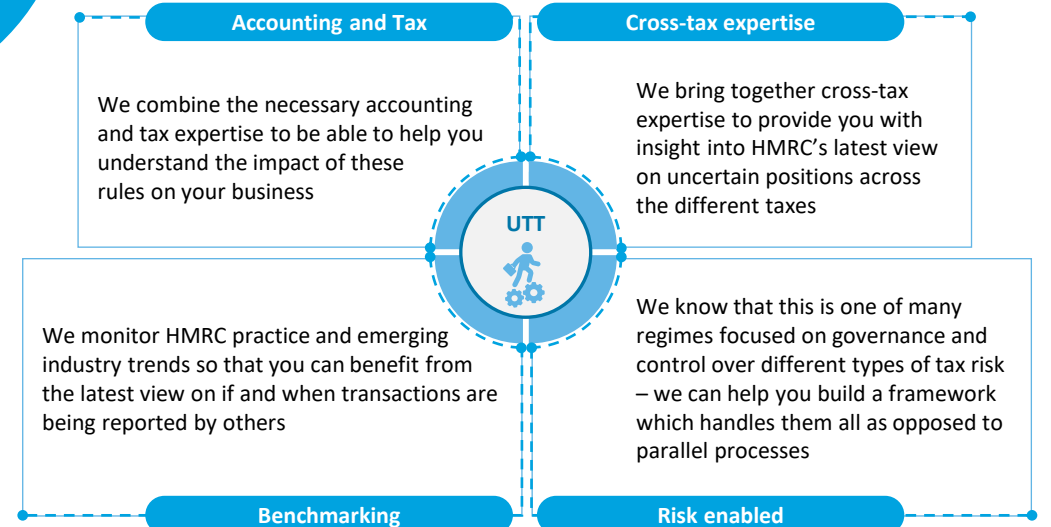
How we can help



Deloitte has developed an approach that can be tailored to your business and its requirements. The components include:

- 1 Tax Control Framework integration:** Updating your tax governance arrangements to build in specific consideration of the application of the regime to your business, supporting compliance as part of your business as usual
- 2 Process design:** Designing a process to help your business meet its compliance obligations. This includes being able to identify, evaluate, document, and where appropriate notify and monitor transactions
- 3 Our view:** Providing a view on the potentially reportable tax positions taken by your business in light of our understanding of the law, available guidance and evolving industry practice.
- 4 Training:** We can provide both classroom and eLearning training to upskill individuals in your business to better understand the regime and the compliance process

Why Deloitte?



Key Tax risks

CT

VAT

Employment
Tax

Customs
Duties

Excise
Duties

Other

Tax compliance risk
(e.g. SAO)

Tax planning risk
(e.g. NUTT)

Tax reporting risk
(e.g. SOX)

Tax reputation risk
(e.g. Tax Strategy)

Tax fraud risk
(e.g. CCO)

Tax Control Framework

Tax Policy, including decision-making protocols

Tax Governance, including reporting

Tax Risk and Controls

People, Processes and Systems

Assurance

NUTT Process

Monitor

Identify

Evaluate

Document

Notify

The journey
to reducing
uncertainty

We can help integrate your NUTT process into your wider Tax Control Framework



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