ADIT Advanced Diploma in International Taxation

JUNE 2020 SITTING
To All International Tax Advisers

GIVE YOURSELF A CLEAR ADVANTAGE WITH ADIT.

Since 2010 Exclusive Learning Provider in Cyprus, in partnership with Tolley Exam Training - Lexis Nexis

Panteis Stylianides Institute of Accountancy and Taxatelier Ltd provide ADIT course in Greece & Ukraine
The School of Professional Studies (SPS) of Cyprus College was established in 1977 and it was the first College in Cyprus to specialise in the provision of professional courses. Since then, SPS has been a leading provider in professional education, supporting thousands of students and busy professionals in obtaining in-demand certifications and designations that enable them to advance and succeed in their careers. SPS has been offering courses leading to the following professional qualifications: ACCA, ICAEW, CFA, CFE and other accounting, finance and related courses. SPS’s combines 40 years of educational and learning excellence with most qualified and experienced tutors and high quality study materials dedicated to ensuring that students are well equipped with the tools for improved performance and success in their studies.

Pantelis Stylianides Institute of Accountancy has been in existence since 1990. The Institute is one of the leading tuition providers in Cyprus on the professional accounting qualification of ACCA and other accounting and related courses. All of our classes are of high standard with the main goal of student success. The whole lecture team consists of experienced professionals who are dynamic, energetic and committed to student success.

Taxatelier Ltd is a premier boutique tax firm practicing exclusively in the field of Cyprus and International Tax. The firm combines the expertise, professionalism and knowledge of serving international clients for a considerable number of years (both locally and abroad) with the personal approach, responsiveness and creativity of a boutique firm. Taxatelier was founded in December 2014 by the Directors of KDC Chartered Accountants Ltd and Neofytos Neofytou.

Tolley Exam Training - Lexis Nexis was established in 2003 by a group of tutors who felt passionate about providing a high quality training environment for all students sitting tax examinations. Since then it has grown and now has a nationwide presence in the UK, as well as running courses outside the UK. Tolley has supported the ADIT examination since its inception and is the only establishment to provide a full distance learning product with tutor support and the pass rates for our courses are well above the overall pass rate.

Full details of these can be found at www.tolley.co.uk/examtraining

The Qualification

ADIT - You Premier Tax Qualification
ADIT is a globally recognised professional qualification accredited by the Chartered Institute of Taxation (CIOT), the leading professional body in the United Kingdom dedicated to taxation. This challenging and rigorous professional qualification is ideal for senior level tax professionals, managers, and professionals as Lawyers, Accountants, Tax Advisers, Management Consultants, Financial Advisers and Notaries working towards a senior level in international tax. If you intend to pursue a career in international taxation - industry, commerce, private practice or the public sector, this is the qualification for you.

Qualification Highlights
- Globally Recognised
- Challenging and Rigorous
- Enhanced Employability
- Focused Material
- Specialist Trainers
- Outstanding Pass Rates
- Practical
- Guaranteed Pass Scheme
- Value for Money

ADIT Exams
To achieve the ADIT qualification, students are required to sit the Principles of International Taxation paper plus two further papers chosen from the Jurisdictional or Thematic options (an extended essay may be completed in place of one of the optional modules). For more information on the modules, and to view the syllabus, please visit www.adit.org

- The qualification is in modular form and is awarded when all stages have been completed.
- All papers may be sat at one examination sitting over three days or separately.
- The entire qualification must be completed within five years.
- Exams are held twice a year.
- All modules are examined each June. The most popular modules are also examined in December.
- All students entering for June exams have the choice of handwritten sitting or on-screen. Exams taking place in December are available as on-screen exams only.
- Each exam is 3 hours plus 15 minutes reading time, in length.
- The pass mark for each paper is 50% and results are released in August and February.

ADIT Registration Fees payable to CIOT:
- Student Registration Fee: £220 (valid for 5 years).
- Exam Registration Fee: £195 per paper. The respective fee for submitting a thesis is also £195.
- Exam entries arriving after the deadlines above cannot be guaranteed and will be subject to £100 late fee.

Key Dates for June 2020 ADIT exam sessions:
- 31 December 2019: Deadline for students to request additional exam center
- 31 January 2020: Student registration deadline
- 16 March 2020: Exam entry deadline
- 31 March 2020: Deadline for late entries (subject to £100 late entry fee)
- 09-11 June 2020: Exams take place
- 20 August 2020: Notification of results via email

Certificates
A full ADIT Qualification Certificate is issued automatically and free of charge to each student who successfully achieves the ADIT qualification, upon completion of the student’s final exam. In addition, ADIT students to demonstrate expertise in the subject(s) examined may apply for a:
- Modular Certificate if they have passed both the Principles of International Taxation module and any one of the sixteen available option modules:
- Standalone Certificate if they have passed either Principles of International Taxation or one thematic option module
The fee for each standalone certificate is £30, including special or courier delivery by CIOT.

Course options available for June 2020 will be as follows:

<table>
<thead>
<tr>
<th>MANDATORY MODULE</th>
<th>OPTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRINCIPLES OF INTERNATIONAL TAXATION This paper focuses on key issues such as Principles of International Tax Law, Residence, Double Taxation Conventions and Treaty Interpretation, Transfer Pricing, the work of the OECD and international tax avoidance.</td>
<td>ADVANCED INTERNATIONAL TAX (Jurisdictional) This paper is based on a specific jurisdiction and students are expected to show a detailed knowledge of their chosen country tax regime regarding international tax matters.</td>
</tr>
<tr>
<td>Exam Training offer: Module 2.03 Cyprus Option</td>
<td>Exam Training offer: Module 3.03 - Transfer Pricing</td>
</tr>
</tbody>
</table>
COURSE CALENDAR NICOSIA

**MODULE 1**
PRINCIPLES OF INTERNATIONAL TAXATION

**TUTORS:**
Christos Theophilou / Lisa-Jane Harper

**STAGE 1**
22-02-2020 09:00 - 17:00

**STAGE 2**
14-03-2020 09:00 - 17:00

**STAGE 3**
28-03-2020 09:00 - 17:00

**STAGE 4**
11-04-2020 09:00 - 17:00
12-04-2020 09:00 - 17:00

**FULL LINK EXAM**
22-04-2020 18:00 - 21:00

**PRE-REVISION MOCK EXAM**
02-05-2020 09:00 - 17:00

**REVISION COURSE DAY 1 & 2**
09-05-2020 09:00 - 17:00
10-05-2020 09:00 - 17:00

**FINAL REVISION MOCK EXAM**
16-05-2020 09:00 - 17:00

**MODULE 2.03**
CYPRUS OPTION

**TUTORS:**
Neophyto Neophytou / Eleni Stylianides

**STAGE 1**
07-02-2020 18:00 - 21:00
08-02-2020 09:00 - 17:00

**STAGE 2**
06-03-2020 18:00 - 21:00
07-03-2020 09:00 - 17:00
Including 1 hour mini exam

**STAGE 3**
04-04-2020 09:00 - 17:00
05-04-2020 09:00 - 17:00
Including 1 hour mini exam
**REVISION COURSE DAY 1**
02-05-2020 09:00 - 17:00
Including pre-revision mock exam
**REVISION COURSE DAY 2 & 3**
23-05-2020 09:00 - 17:00
24-05-2020 09:00 - 17:00

**FINAL REVISION MOCK EXAM**
30-05-2020 09:00 - 12:00

**MODULE 3.03**
TRANSFER PRICING OPTION

**TUTORS:**
Gaspar Lopes Dias / James Ryan

**STAGE 1**
14-02-2020 18:00 - 21:00
15-02-2020 09:00 - 17:00

**STAGE 2**
20-03-2020 18:00 - 21:00
21-02-2020 09:00 - 17:00

**STAGE 3**
25-04-2020 09:00 - 17:00
26-04-2020 09:00 - 17:00

**FULL LINK EXAM**
27-04-2020 18:00 - 21:00

**PRE-REVISION MOCK EXAM**
09-05-2020 09:00 - 17:00

**REVISION COURSE DAY 1 & 2**
16-05-2020 09:00 - 17:00
17-05-2020 09:00 - 17:00

**FINAL REVISION MOCK EXAM**
23-05-2020 09:00 - 17:00

*Deadline to Submit Exams Online

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COURSE CALENDAR LIMASSOL

**MODULE 1**
PRINCIPLES OF INTERNATIONAL TAXATION

**TUTORS:**
Christos Theophilou / Lisa-Jane Harper

**STAGE 1**
07-03-2020 09:00 - 17:00

**STAGE 2**
21-03-2020 09:00 - 17:00

**STAGE 3**
04-04-2020 09:00 - 17:00

**STAGE 4**
25-04-2020 09:00 - 17:00
26-04-2020 09:00 - 17:00

**FULL LINK EXAM**
27-04-2020 18:00 - 21:00

**PRE-REVISION MOCK EXAM**
02-05-2020 09:00 - 17:00

**REVISION COURSE DAY 1 & 2**
09-05-2020 09:00 - 17:00
10-05-2020 09:00 - 17:00

**FINAL REVISION MOCK EXAM**
16-05-2020 09:00 - 17:00

*Deadline to Submit Exams Online

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**ADIT JUNE 2019 EXAMINATION - PASS RATES**

<table>
<thead>
<tr>
<th>MODULE</th>
<th>TOLLEY EXAM TRAINING**</th>
<th>NATIONAL AVERAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 - Principles of International Taxation</td>
<td>100%</td>
<td>83%</td>
</tr>
<tr>
<td>Module 3.03 - Transfer Pricing Option</td>
<td>100%</td>
<td>80%</td>
</tr>
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</table>

** ** Pass rates for those enrolled on the Guaranteed Pass Scheme

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**JUNE 2020 EXAM TUITION FEES**

<table>
<thead>
<tr>
<th>MODULE</th>
<th>PRICE</th>
<th>HRDA SUBSIDY</th>
<th>NET COST</th>
<th>CPD UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 - Principles of International Taxation</td>
<td>€1960</td>
<td>€510**</td>
<td>€1450</td>
<td>30</td>
</tr>
<tr>
<td>Module 2.03 - Cyprus Option</td>
<td>€1960</td>
<td>€510**</td>
<td>€1450</td>
<td>30</td>
</tr>
<tr>
<td>Module 3.03 - Transfer Pricing Option</td>
<td>€1960</td>
<td>€510**</td>
<td>€1450</td>
<td>30</td>
</tr>
</tbody>
</table>

Price includes all the materials required for the classroom course, study manual, question bank, link exam, pre-revision mock exam and revision mock.

Registration and Examination Fees to the CIOT are not included.

* The programme is subject for approval by HRDA. Enterprises participating with their employees, who satisfy HRDA’s criteria, are entitled to subsidy amounting to €510. The number of participants is restricted to 28.

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**CANCELLATION:** The providers (Cyprus College School of Professional Studies, Pantelis Stylianides Institute of Accountancy, & Taxatelier Tax Firm) reserve the right to cancel a course with less than seven registered participants two business days prior to the commencement date, because of the cost of the bespoke course. In the event of cancellation, registered participants will receive an email on the matter and any amount of money paid will be fully refunded.
Module 1 - Principles of International Taxation

Lisa-Jane Harper, Barrister [Non-practising], CTA, ADIT
Lisa-Jane Harper specialises in Corporate and International Tax. A St Andrews’ graduate, she took an MA in Law at City University and went into private practice before training in tax at KPMG’s Tax Business School, where she passed the ATI and CTA exams. Once qualified Lisa-Jane worked as a tax lawyer in the City, undertaking predominantly cross-border transaction work and banking. Lisa-Jane moved to EY in 2004, and in 2007 whilst on secondment to the tax training team, she decided to take on a new challenge and passed the Advanced Diploma in International Tax. The diploma complemented her work well, with her being based offshore in the Channel Islands. Lisa-Jane moved back to the UK in December 2009 and joined Tolley’s in 2010 to teach CTA and ADIT.

Christos A. Theophilou, Partner Taxatelier, BSc (Econ.), FCA, ADIT, MSc Tax (Oxon)
Christos A. Theophilou holds the MSc in Taxation from the Oxford University Faculty of Law. He qualified with KPMG and currently is Tax Partner at Taxatelier. Christos is specialised in corporate tax issues with an international dimension, such as private equity structuring, cross-border investments, structured finance and international trade. Christos is a contributor to international tax publications such as BFD, Tax Notes International, Bloomberg BNA and FA as a national reporter. Furthermore, Christos is currently a member of ICPAC (Institute of Certified Public Accountants of Cyprus) Tax Planning & Policy committee. Given his love of tax and lecturing, he has also been at the forefront of developments in the Cyprus tax market by launching the first International Tax Academy in Cyprus by providing ADIT courses since 2010 in Partnership with Tolley’s and PS Institute. He is also responsible for designing ADIT courses and being involved in examination training. Christos is a well-known personality in the tax world, where he is a regular speaker at a wide range of conferences. Christos is also a freelance lecturer for Tolley’s in Greece, Cyprus and Ukraine, where his main areas are ADIT Paper 1 Principles of International Tax. He has a reputation for giving clear, enthusiastic lectures and always having time to help candidates - whether in choosing which ADIT options to study or helping with technical queries.

Eleni Stylianides FCCA, Founder PS Institute of Accountancy Ltd
Eleni Stylianides is a member of the Association of Chartered Certified Accountants (ACCA) and the Institute of Certified Public Accountants in Cyprus (ICPAC). She is a Director and co-owner of P S Institute of Accountancy Ltd, a long established company specialising in Financial Reporting and Tax Learning Products (ADIT, ACCA, LCCI), well-known for offering highly recognised and accredited for excellence courses to demanding professionals and potentially qualified individuals. Eleni is an approved ACCA Tutor with over 20 years of experience, delivering professional level qualifications and preparing them to predominantly cross-border tax issues. Since 1993 she has given lectures and acted as a tutor for Tax and Accounting at the Cyprus University of Technology. Her energetic, enthusiastic and distinctive teaching style in Cyprus Tax Papers and is especially known for her focused revision teaching methods, leading to many of her students being awarded first prizes in Cyprus Tax papers. Given her passion for tax and lecturing, Eleni has been at the forefront of developments in the Cyprus tax market by launching the first International Tax Academy in Cyprus by providing ADIT courses for the last 7 years in Partnership with Tolley exam Training (Part of LexisNexis) and Taxatelier. Eleni is a lecturer of the ADIT Cyprus Option in Greece, Cyprus & Ukraine.

Neophytos Neophytou FCA, International Tax Advisor
Neophytos Neophytou is a Fellow Chartered Accountant of England and Wales with 30 years of experience as a partner, as well as Head of Tax Services and partner in the International Tax Services Group in a Big 4 accounting firm. He has extensive experience in international tax planning, structuring operations and group structures for international clients in the oil and gas industry, the banking and financial industry (including FX business), the construction and hotel industry, the manufacturing and service industries etc. and his clients included major local and international groups. He is currently tax advisor to selected international businesses and is teaching international taxation issues, with particular emphasis on substance, transparency and exchange of information. He teaches the Cyprus Paper for the ADIT qualification. In 2013 he founded Redimus, a specialised tax consulting firm, which has also established a comprehensive, one-stop tax portal for all tax-related matters in Cyprus and internationally and provides specialized tax courses on international taxation issues to professionals. He has acted as chairman on various conferences on tax-related issues. Furthermore, he is currently a tax advisor to the Institute of Certified Public Accountants of Cyprus advising members on tax issues. For more than six years he has also been acting as a special advisor to the Minister of Finance on double tax treaties issues and negotiations as well as other tax issues.

James Ryan ATI, CTA, ADIT, BA (Hons.)
James Ryan is a Chartered Tax Advisor and a member of the Irish Tax Institute. He also holds the specialised Advanced Diploma in International Taxation from the Chartered Institute of Taxation (UK). James lectures in the UK, Ireland, Mainland Europe and the Middle East to Multinational Companies, Advisory Firms, Tax Authorities and to National Tax Institutions in the areas of International Tax and Transfer Pricing. James has broad experience in advising personal and corporate clients in business and finance, has developed strong business and advisory relationships within the Banking, Legal, Pensions and Financial Industries. His background in financial services combined with his tax expertise gives him a holistic understanding of the interface between finance planning and tax.

Gaspár Lopes Dias, Transfer Pricing specialist, LL.B (civil law), LL.M, ADIT
Gaspár Lopes Dias is an associate in the tax practice of Baker McKenzie in London, having previously spent over 4 years working at Loyens & Leef in Luxembourg. He specialises in international taxation and transfer pricing, Gaspar advises multinationals as well as investment funds on financial transactions and on intra-group services. Previously Gaspár worked at KPMG Belgium, having gained experience in several industries and in a broad range of transfer pricing matters, including TP documentation, IP structuring and arm’s length license fees and relocation of functions. Gaspár has a law degree from New University of Lisbon, an Adv. LL.M in European and International Taxation from the European Tax College of Tilburg University and is currently a candidate at the MSc in Taxation at the University of Oxford. He has also followed advanced transfer pricing courses at the ITC Leiden and WU. Gaspár is a contributor to transfer pricing publications such as the BNA Transfer Pricing Forum and a frequent speaker on transfer pricing and BEPS subjects, having recently presented at the Rust Conference in Austria, at the BFD3 in Amsterdam and in Mozambique.

Registration and Enquiries

Cyprus College
The School of Professional Studies

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SCHOOL OF PROFESSIONAL STUDIES

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