

**Corporate Taxpayer
Income Tax Return**

**Economic Substance Insert
Intangible Property Relevant
Sector**

Income Tax Division
Government Office, Douglas
Isle of Man, British Isles
IM1 3TX

Telephone (01624) 685400
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Email incometax@gov.im
Website www.gov.im/incometax

Company Name:

Tax Reference Number:

Accounting Period End:

IMPORTANT INFORMATION

This Economic Substance insert is required to be completed if the company is resident for tax purposes and has gross income from the relevant sector stated at the top in the accounting period covered by the income tax return **and** the company is exempt from compulsory online filing. If the company is not exempt from compulsory online filing, the online company income tax return must be completed.

Please refer to the 'Updated Economic Substance Guidance - Joint Guernsey Isle of Man and Jersey' on the Economic Substance page of our website for information about the economic substance requirements. Please refer to sections 6.1.5 and 6.12 of GN58 – 'Company Income Tax Return How to Complete Returns for Accounting Periods ending on or after 31 December 2019' on the Guidance Notes page of our website for further information about the questions asked on this form and the responses required. GN58 also contains further information about compulsory online filing.

Important: This insert is an integral part of the company's income tax return so all mandatory fields marked * must be completed. If any are not completed the return will not be accepted because it is incomplete.

ECONOMIC SUBSTANCE – DIRECTED AND MANAGED IN THE ISLE OF MAN

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|-----|--|---------------------------------------|
| 1.1 | Have there been board meetings in the IOM during the accounting period at an adequate frequency given the level of decision making required, at which a quorum of directors was physically present?* | <input type="text" value="Yes / No"/> |
| 1.2 | How many of these board meetings were held during the accounting period? * | <input type="text"/> |
| 1.3 | Please confirm if the following statements are true: * | |
| | The strategic decision are taken by the board of directors at the meeting(s) held in the Isle of Man during the accounting period | <input type="text" value="Yes / No"/> |
| | The board of directors have the necessary knowledge and expertise to discharge their duties | <input type="text" value="Yes / No"/> |
| | The company's minutes reflect the strategic decisions taken at the meetings in the Island and are kept in the Isle of Man along with all the other relevant records | <input type="text" value="Yes / No"/> |

ECONOMIC SUBSTANCE – INTANGIBLE PROPERTY

2.1 Please state the company's gross income from activity in the intangible property relevant sector during the accounting period

£

2.2 Please confirm which, if any, of the following Core Income Generating Activities (CIGA) were conducted in the Isle of Man during the accounting period

Research and development

Marketing, branding and distribution

Taking the strategic decisions and managing (as well as bearing) the principle risks relating to the development and subsequent exploitation of the intangible asset

Taking the strategic decisions and managing (as well as bearing) the principle risks relating to the third party acquisition and subsequent exploitation of the intangible asset

Carrying on the underlying trading activities through which the intangible asset is exploited and which lead to to the generation of revenue from third parties

Other

Description of 'Other' CIGA:

2.3 Were any of the above CIGA outsourced to a service provider in the Isle of Man during the accounting period? *

Yes / No

2.3.1 Name(s) of Service Provider

2.3.2 Details of CIGA outsourced

(Continue on a separate sheet if necessary)

2.3.3 Expenditure incurred on outsourcing of CIGA (including decimals if applicable)

£

2.4 Were any CIGA conducted outside of the Isle of Man during the accounting period?*(
(If yes, please attach details of the CIGA conducted outside the Island)

Yes / No

ECONOMIC SUBSTANCE – PHYSICAL PRESENCE, EMPLOYEES & EXPENDITURE

3.1 Please confirm below the address, if any, of any premises/offices in the Isle of Man:

(If no premises, leave blank)

3.2 Please confirm the number of full time equivalent (FTE) employees, if any, who have worked for the company in the Isle of Man during the accounting period *

FTE Employees – Company's Own

FTE Employees – Outsourced

(FTE Number can be to 2 decimal places)

3.3 Please confirm the tax reference number where any ITIP/NI payments have been made to the Income Tax Division (If not known, leave blank)

3.4 Please confirm the amount of operating expenditure incurred during the accounting period *(
(Enter the amount to the nearest whole number)

ECONOMIC SUBSTANCE – ADDITIONAL INFORMATION

4.1 Please state the Net Book Value (NBV) of tangible assets at the end of the accounting period*
(Enter the amount to the nearest whole number)

£

4.2 The company is a High Risk IP Company and wishes to rebut the statutory presumption that the company fails to have adequate substance in the Isle of Man

Yes/No

(If the company is not a High Risk IP company please leave blank)

4.3 In the opinion of the directors based on the details provided in and with the income tax return, the company has adequate substance in the Island for the accounting period*

Yes/No

Supporting Information Required

The following additional information should be provided with this form and the income tax return:

- A copy of the financial statements for the accounting period, including directors' report, auditor's report (if applicable) and all notes pages
- Confirmation of the basis of the calculation of the number of FTE qualified employees - of the company itself and of any service provider undertaking outsourced CIGA - and the nature of the engagement (employee, contractor etc.) and the qualifications taken into account.
- Additional information to demonstrate the adequate supervision measures in place between the company and any service provider undertaking outsourced CIGA, and that the outsourced CIGA is conducted in the Island.
- If the company has no premises in the Island, the nature of its physical presence in the Island and why that considered to be adequate in relation to the company's activities
- Any other information that the company considers to be material in determining that it has adequate substance in the Island for the accounting period. (e.g. why the directors have concluded that the company is an IP company not a High Risk IP company, why some board meetings were held outside the Island, why any activities carried on outside the Island are not CIGA, etc.)
- If a High Risk IP Company wishes to rebut the presumption that the economic substance requirement is not met, the information required by section 80G(1A) of the Income Tax Act 1970 must also be attached to the income tax return when it is submitted.

DECLARATION

I declare that the details provided on this form are, to the best of my knowledge and belief, true and correct in every detail.

Name:

	Director / Secretary
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Signature:

Date:

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USE OF DATA NOTICE

Privacy Notice: To find out more about how we collect and use personal information, contact our office or visit our website at: www.gov.im/treasuryprivacynotice We will send you a paper copy if you telephone us or write to us using the contact details provided on this form.