Structure of examination paper
The syllabus will be assessed in a 3 hours paper plus a 15 minutes reading time. The questions will be in two sections as follows:

Section A
Section A will be 20 compulsory multiple-choice questions of one mark each. Eight of the questions will come from section A, eight from section B, two from section C and two from section D of the syllabus.

Section B
Section B will be 6 questions of 20 marks each out of which candidates will be expected to attempt 4 questions. The 6 questions will come from all the four sections of the syllabus based on the weight attached to each section in the syllabus.

Detailed contents of the syllabus

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<td>1</td>
<td>Introduction to taxation</td>
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<td></td>
<td>a) State the objectives of taxation.</td>
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<td>b) Explain the types of taxes and tax system.</td>
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<td>c) Explain the basic concepts in taxation:</td>
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<td></td>
<td>i) Tax base, tax yield, tax rate, tax incidence</td>
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<td>ii) Tax burden, tax impact, tax shift, tax effect</td>
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<td>d) Differentiate between tax and other levies.</td>
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<td>e) Explain the principles/canons of taxation.</td>
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<td>f) Explain the principles / canons of taxation.</td>
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<td>i) Enabling Acts</td>
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<td>ii) Sources of the tax laws.</td>
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<td>Tax administration in Nigeria</td>
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<td>a) List and explain the roles, functions, compositions and powers of:</td>
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<td>i) Joint Tax Board.</td>
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<td>ii) State Board of Internal Revenue.</td>
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</table>
iii) Federal Inland Revenue Service and its management Board.
iv) Joint State Revenue Committee.
v) Local Government Revenue Committee.
b) Tax amnesty, including voluntary assets and income declaration scheme (VAIDS)
c) Explain the role and relationship between fiscal policy, tax legislation and administration.

3 National tax policy (NTP), 2017

a) State the objectives of this policy.
b) Explain the policy guidelines as they relate to:
   i) Guiding principles of Nigerian tax system.
   ii) Taxation as a tool for economic management and development:
       · Wealth creation and employment
       · Taxation and diversification
       · Focus on indirect taxation
       · Convergence of tax rates
       · Special arrangements and other incentives
       · Creating a competitive edge
       · International and regional treaties
c) Explain the responsibilities of the following stakeholders:
   i) The government.
   ii) The taxpayer.
   iii) Revenue agencies.
   iv) Professional bodies, tax practitioners, consultants and agents.
   v) Media and advocacy groups.
d) Explain the administration of the mandates of the three-tiers of government in accordance with the following:
   i) Registration of taxable persons
   ii) Tax compliance.
   iii) Efficiency of administration.
   iv) Technology and tax intelligence.
   v) Dispute resolution.
e) Explain the implementation measures by
i) The President and Governors
ii) Legislature
iii) Ministry of Finance
iv) Ministries, departments and agencies
v) Tax authorities

4 Basic ethical issues in taxation
a) Identify and explain the following five fundamental principles of ethics as specified by the International Ethics Standards Board for Accountants (IESBA):
   i) Integrity
   ii) Objectivity
   iii) Professional competence and due care
   iv) Confidentiality
   v) Professional behavior
b) State the conditions when information on taxpayers may be disclosed
c) Explain what a tax practitioner should do when there is a conflict of interest.

5 Returns, assessments, remittances, objections and appeals
a) Explain the basis for registration and filing of returns with the revenue authorities covering the following:
   i) Time within which to register.
   ii) Registration requirements and processes.
   iii) Contents of a tax return.
   iv) Due date for filing of tax returns.
   v) Time within which to pay tax assessed.
b) Explain the following types of assessments:
   i) Self assessment.
   ii) Additional assessment.
   iii) Best of judgement (BOJ) / administrative assessment.
   iv) Back duty assessment.
c) Explain the following in respect of a tax clearance certificate (TCC):
   i) Definition and contents.
   ii) The conditions for granting a TCC.
   iii) The transactions for which a TCC is required.
   iv) The procedure for processing TCC.

d) Identify and explain the procedures for tax objections and appeals, covering the following:
   i) Time limit for objection and appeal.
   ii) Contents of a notice of objection and appeal.
   iii) Amendment of assessment and refusal to amend.
   iv) Appeal procedures and processes: Tax Appeal Tribunal, Federal High Court, Court of Appeal and Supreme Court.

B Transactions taxes

1 Withholding tax (WHT)
   a) Explain the nature, objectives and administration of WHT.
   b) State the transactions/incomes subject to WHT and applicable rates.
   c) State the relevant tax authority for collection of WHT.
   d) Explain the procedure for filing WHT return; list its contents and time frame for compliance.
   e) State the procedures and provisions relating to WHT refunds and grounds for objection.
   f) Explain the procedure for remittance of WHT to tax authorities.
   g) State the administrative bottlenecks and other problems of WHT.
   h) State the merits and demerits of WHT scheme.

2 Value added tax (VAT)
   a) Explain the nature, objectives and administration of VAT.
   b) Explain taxable persons and taxable supplies of goods and services.
   c) Explain the following in relation to VAT:
      i) Input tax
      ii) Output tax
      iii) Exemption
iv) Zero-rate supplies and services
v) Reverse VAT
vi) Basic tax point
vii) Actual tax point
viii) Standard rate
d) Compute VAT liability, including the treatment of opening and closing inventories.
e) State the obligations for registration, records and accounts keeping, and valid VAT invoice.
f) Explain the requirements for filing of VAT returns and remittance of VAT liability.
g) Explain the treatment of VAT on imported and exported goods and services.
h) State the offences and penalties associated with VAT.
i) Explain the provision on VAT recovery.

3 Stamp duties
a) State the nature and objectives of stamp duties.
b) List the instruments chargeable.
c) State the relevant tax authorities for collection.
d) State the types and forms.
e) Explain the time limit for stamping and implications of non-stamping.
f) Explain the recoverability of outstanding duties.
g) State the rates and the basis of computation.
h) Explain the administration, territorial limits and the methods of stamping.
i) Explain the process of adjudication, the limits and appeals procedure.

4 Customs and excise duties
a) Explain the nature, objectives and administration of customs and excise duties.
b) State the rates and basis of computation.
c) List excisable items.
d) State provisions relating to the furnishing of information by manufacturers and keeping of books.
e) State offences and penalties.

5 Luxury tax

a) Define luxury tax.
b) State the relevant goods and services.
c) State the applicable rate for each of the goods and services.
d) Explain the benefits of taxation of luxury goods.

6 Land use charge

a) Explain annual charge rate, building, chargeable persons, chargeable property, exempted property, owner, occupier and financial year.
b) State the collecting authority.
c) State the persons liable to pay charge.
d) State exempted properties.
e) Compute the annual amount of the land use charge payable:
   i) Relief rate
   ii) Annual charge rate
   iii) Basis of computation.
f) Explain the procedure for the delivery of assessment notice of land use charge:
   i) The issuance and delivery of land use charge demand notice.
   ii) Posting of land use demand notice
   iii) Time limit for the payment of the assessment notice after the date of delivery.
   iv) Payment to designated banks.
g) Identify and explain the procedures for objections and appeals, covering the following:
   i) Time limit within which to register.
   ii) Conditions for the appeal.
   iii) Contents of the notice of objection and appeal.
   iv) Amendment of assessment and refusal to amend.
   v) Appeal procedures and processes: Tax Appeal Tribunal, High Court of the State, Court of Appeal, and Supreme Court.

C Personal income tax 30%
1 Taxation of employment income
   a) Explain employment; contract of service and contract for service.
   b) Explain the following types of employment:
      i) Nigerian employment.
      ii) Foreign employment.
   c) Explain employment, vocation and profession.
   d) Define an itinerant worker.
   e) Explain the following terminologies in employment income:
      i) Cash emolument.
      ii) Benefits-in-Kind.
      iii) Taxable and tax-exempt incomes.
   f) State and explain the conditions for taxation of income from employment.
   g) List and explain allowable and non-allowable deductions.
   h) Explain the following:
      i) Registration for pay-as-you-earn (PAYE)
      ii) Basis of assessment
      iii) Computation of consolidated relief allowance.
      iv) Computation of personal income tax.
      v) Filing of returns: employees and employers.
      vi) Offences and penalties.

2 Taxation of trusts, settlements and estates
   a) Define trusts, settlements and estates.
   b) Explain allowable and non-allowable expenses.
   c) Compute income from trusts, settlements and estates.
   d) Compute taxable income.
   e) Compute tax liability in the hands of beneficiaries and trustees.
   f) Identify relevant tax authority.
   g) State and explain offences and penalties.

3 Taxation of investment income
a) Define investment income.
b) Compute rental income chargeable to tax on property, including contractor-financed projects.
c) Explain the tax implications of dividends and interests.
d) Explain the bases of assessments and payment of taxes on investment incomes.

D Business income tax

1 Taxation of business income

a) Sole proprietorship
   i) Explain the meaning of a trade or profession and badges of trade.
   ii) Computation of assessable profit of a trade or profession:
      - Identify taxable and non-taxable income.
      - Identify and explain allowable and non-allowable expenses.
      - Ascertain adjusted profit.
   iii) Basis period for assessment:
      - Define basis period and state types
      - State the rules for commencement, change of accounting date and cessation.
   iv) Loss relief:
      - Identify and explain types of loss reliefs and their treatments.
      - Explain the treatments of losses under commencement and cessation of business.
   v) Capital allowances computation:
      - Define qualifying capital expenditure and capital allowance
      - Explain the types of capital allowances and qualifying capital expenditure.
      - State the conditions for granting capital allowance.
      - Identify capital allowance rates and restrictions.
      - Compute balancing adjustments on disposal of qualifying capital expenditure.
b) Partnerships
   i) Define partnership.
   ii) Explain allowable and non-allowable expenses.
   iii) Compute the income of a partnership business.
   iv) Identify the taxable income of partners.
   v) State the tax treatment under admission and resignation of a partner.

   c) Limited liability companies
   i) Identify persons chargeable to companies’ income tax.
   ii) Computation of assessable profit:
       - Explain taxable and non-taxable income.
       - Explain allowable and non-allowable expenses.
       - Ascertained assessable profit.
   iii) Basis period for assessment:
       - Define and state types.
       - Explain the rules for commencement, change of accounting date and cessation of business.
   iv) Loss relief:
       - Explain Loss relief principles.
       - Explain the treatment of losses under commencement, change of accounting date and cessation of business.

   v) Capital allowances computation
       - Explain types of capital allowance.
       - Define and explain types of qualifying capital expenditure.
       - State the conditions for granting capital allowance.
       - Identify and apply the capital allowance rates and restrictions.
       - Compute balancing adjustments on disposal of qualifying capital expenditure.
   vi) Compute companies income tax liability, taking the following into consideration:
       - Total profit
       - Minimum tax
       - Dividend distribution
- Revenue / turnover

vii) Compute and explain the bases for computing deferred tax.

2 **Taxation of specialised businesses**

a) Define specialised businesses.

b) State the relevant tax provisions for real estate and agriculture.

c) State the tax provisions and compute tax liability on income from transportation, telecommunication, banks and insurance businesses.

d) Explain the circumstances when the Revenue can assess a company based on its turnover / revenue.

e) Identify and explain criteria that must be met to be eligible for small company relief.

f) State the basis for taxation of enterprises in free trade zones.

g) Explain the provisions of the Nigerian Information Technology Development Agency Act (NITDA) 2007 (as amended) as it relates to taxation.

h) Compute taxes on income from e-commerce.

3 **Tertiary education tax (TET)**

a) Define tertiary education tax.

b) State the objectives and basis of computation of tertiary education tax as provided in the enabling Act.

c) Explain the imposition, assessment and collection of the tax.

d) State the management and administration of the Tertiary Education Tax Fund (TET Fund).

e) State the composition and functions of the board of trustees.

f) Explain the allocation and distribution of the tax.

g) State the offences and penalties for non-compliance.