Tax Accounting
Unravelling the Mystery of Income Taxes
Why this book?
In recent years, regulators and the media alike have shown increased interest in tax reporting and the disclosure of taxes. Part of the resulting discussion has been about the complexity of accounting for income taxes, since it requires two very different worlds – accounting and tax – to converge. Tax accounting is the fine art of connecting and reflecting these two worlds in the financial statements. The differences, either permanent or temporary in nature, between the principles used for financial reporting and those established by tax law are the focus for tax accountants.

Tax Accounting: Unravelling the Mystery of Income Taxes provides a unique insight into accounting for income taxes under International Financial Reporting Standards (IAS 12) and gives a detailed ten-step methodology to compute, determine and disclose the tax consequences in the financial statements of a company. It likewise explains the essence of tax accounting, touching on primary tax accounting terminology, and the legislators and regulators involved, as well as other factors, such as the media influence on income tax reporting.

Some of the issues addressed include book to tax differences, deferred tax asset recognition, uncertain tax positions, effective tax rate reconciliation and disclosure notes. The theory is supported by practical examples from selected countries across the globe. A case study provides the reader with a full understanding on how to arrive at the correct tax figures and disclosure notes, and in doing so truly unravels the mystery of how the reported income taxes can be explained.

Tax Accounting: Unravelling the Mystery of Income Taxes is a valuable reference tool to assist tax accountants, tax authorities, legislators, tax practitioners, and tax managers and directors in their daily practice, as well as a guideline for newcomers to the tax accounting environment.

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# Table of contents

Acknowledgements v

Foreword vii

Chapter 1: Introduction to Tax Accounting

*Tjeerd van den Berg and Alycia Spitzmueller*

1.1. Introduction 1

1.2. Importance of accounting for income taxes 2

1.3. Primary tax accounting terminology 3

1.4. How are income taxes accounted for? 5

1.5. Other factors affecting tax reporting: Looking beyond the accounting requirements 13

1.5.1. Introduction 13

1.5.2. Non-regulatory pressure and other media coverage 14

1.5.2.1. Introduction 14

1.5.2.2. Corporate social responsibility 15

1.5.2.3. Fair share 17

1.5.2.3.1. Publish What You Pay 18

1.5.2.3.2. Non-governmental organizations 18

1.5.3. Regulatory changes and proposals 19

1.5.3.1. Introduction 19

1.5.3.2. Country-by-country reporting 21

1.5.3.2.1. The Extractive Industries Transparency Initiative 21

1.5.3.2.2. The US Dodd-Frank Act 25

1.5.3.2.3. EU directive on accounting and transparency 27

1.5.3.2.4. EU Capital Requirements Directive 29

1.5.3.2.5. OECD Guidelines 31

1.5.4. Conclusion 32

1.6. International Financial Reporting Standards 32

1.6.1. Introduction 32

1.6.2. Why are International Financial Reporting Standards developed? 32

1.6.3. The convergence project 35

1.6.4. What is the IASB? 36

1.6.6. IFRS Foundation 38
## Table of Contents

1.6.7. IFRS Foundation trustees 38  
1.6.8. IFRS Foundation monitoring board 39  
1.6.9. IFRS advisory council 40  
1.6.10. IFRS Interpretations Committee 40  
1.6.11. Accounting Standards Advisory Forum 41  
1.6.12. Financial reporting standards 41  
1.6.12.1. Introduction 41  
1.6.12.2. The due process of IFRS 42  
1.6.12.3. The due process of IFRIC interpretations 44  
1.6.13. Conclusion 45  

### Chapter 2: Definition of Income Taxes

*Prof. Dr. Eva Eberhartinger and Alexandra Patloch* 47  

2.1. Scope of IAS 12 47  
2.2. Income taxes in the statements and analysis 50  
2.3. Income taxes 51  
2.4. Specific forms of taxation 52  
2.4.1. Income tax 52  
2.4.2. Withholding tax 54  
2.4.3. Business tax 55  
2.4.4. Tonnage tax 57  
2.4.5. Mining tax 58  
2.4.6. Interest payments and penalties 59  
2.4.7. Alternative minimum taxes 60  
2.4.8. Tax on value added 61  
2.4.9. Tax beyond the scope of IAS 12 61  
2.5. Differences between IFRS and US GAAP 61  

### Chapter 3: Book-to-Tax Differences: Permanent and Temporary

*David Chopping* 63  

3.1. Introduction 63  
3.2. Tax returns and financial statements 70  
3.3. Adjustment of profit for tax purposes and the performance statements 72  
3.4. Reconciliation of IFRS, national GAAP and group accounts 73  
3.5. Manner of recovery of assets 74
Table of Contents

Chapter 4: Current Tax and Prior Year Adjustments  
*Terry Tam and Timothy Hale*  
77

4.1. Introduction 77
4.2. The process 78
4.3. Calculate current tax for the year 79  
4.3.1. Calculate taxable income for the year 79  
4.3.2. Tax rates 82
4.3.3. Tax incentives 84
4.3.4. Uncertain tax positions 86
4.3.5. Tax loss carry-back claims 87
4.4. Calculate any prior year adjustments 90  
4.4.1. Prior year adjustments 90  
4.4.2. Change in accounting estimate vs. error 93
4.5. Reconcile tax accounts 96  
4.5.1. Introduction 96  
4.5.2. Balance sheet classification 98
4.5.3. Discounting 99
4.6. Conclusion 100

Chapter 5: Deferred Taxes  
*Ronel Buys*  
101

5.1. Introduction 101
5.2. Overview of deferred tax assets and liabilities 103  
5.2.1. Recognition 103  
5.2.2. Measurement 105
5.2.3. Presentation 106
5.3. Practical approach to calculating deferred tax 107
5.4. Basic principles of carrying amount 108
5.5. Tax base as the basis for calculating deferred tax 109  
5.5.1. Tax base of an asset 109  
5.5.2. Tax base of a liability 112
5.5.3. Tax base of revenue received in advance 114
5.5.4. Uncertainty in determining the tax base 115
5.6. Tax base without a carrying amount 115
5.7. Calculate the temporary differences 116  
5.7.1. Temporary difference 117  
5.7.2. Taxable temporary differences 117  
5.7.2.1. Assets 117
5.7.2.2. Liabilities 118
<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.7.2.3.</td>
<td>Other examples of taxable temporary differences</td>
<td>119</td>
</tr>
<tr>
<td>5.7.3.</td>
<td>Deductible temporary differences</td>
<td>119</td>
</tr>
<tr>
<td>5.7.3.1.</td>
<td>Assets</td>
<td>120</td>
</tr>
<tr>
<td>5.7.3.2.</td>
<td>Liabilities</td>
<td>120</td>
</tr>
<tr>
<td>5.7.3.3.</td>
<td>Other examples of deductible temporary differences</td>
<td>121</td>
</tr>
<tr>
<td>5.7.4.</td>
<td>Other examples of temporary differences</td>
<td>122</td>
</tr>
<tr>
<td>5.8.</td>
<td>Recognition criteria and initial recognition exemptions</td>
<td>123</td>
</tr>
<tr>
<td>5.8.1.</td>
<td>Initial recognition exemption</td>
<td>123</td>
</tr>
<tr>
<td>5.8.2.</td>
<td>Initial recognition of goodwill exempted from deferred tax</td>
<td>127</td>
</tr>
<tr>
<td>5.8.3.</td>
<td>Exemption from recognizing outside basis deferred tax</td>
<td>127</td>
</tr>
<tr>
<td>5.8.4.</td>
<td>Exemption from recognition of deferred tax assets</td>
<td>128</td>
</tr>
<tr>
<td>5.9.</td>
<td>Manner of expected recovery</td>
<td>128</td>
</tr>
<tr>
<td>5.9.1.</td>
<td>Substantively enacted tax rates</td>
<td>128</td>
</tr>
<tr>
<td>5.9.2.</td>
<td>Tax rates based on manner of recovery</td>
<td>129</td>
</tr>
<tr>
<td>5.9.3.</td>
<td>Recovery of investment property</td>
<td>131</td>
</tr>
<tr>
<td>5.9.4.</td>
<td>Different tax rates for levels of taxable profit</td>
<td>133</td>
</tr>
<tr>
<td>5.10.</td>
<td>Reconcile movements in deferred tax balances</td>
<td>134</td>
</tr>
<tr>
<td>5.10.1.</td>
<td>Disclosure of deferred tax movements</td>
<td>134</td>
</tr>
<tr>
<td>5.10.2.</td>
<td>Accounting for a deferred tax movement</td>
<td>135</td>
</tr>
<tr>
<td>5.10.2.1.</td>
<td>Deferred tax movements in the income statement</td>
<td>135</td>
</tr>
<tr>
<td>5.10.2.2.</td>
<td>Deferred tax movements in other comprehensive income</td>
<td>136</td>
</tr>
<tr>
<td>5.10.2.3.</td>
<td>Deferred tax movements in equity</td>
<td>136</td>
</tr>
<tr>
<td>5.10.3.</td>
<td>Disallowance of discounting</td>
<td>136</td>
</tr>
<tr>
<td>5.10.4.</td>
<td>Deferred tax on capital losses</td>
<td>137</td>
</tr>
<tr>
<td>5.11.</td>
<td>Practical issues</td>
<td>137</td>
</tr>
<tr>
<td>5.11.1.</td>
<td>Investment tax credits</td>
<td>137</td>
</tr>
<tr>
<td>5.11.2.</td>
<td>Deferred tax on compound financial instruments</td>
<td>140</td>
</tr>
<tr>
<td>5.11.3.</td>
<td>Divestments: Rollover relief</td>
<td>140</td>
</tr>
<tr>
<td>5.11.4.</td>
<td>Intra-group transactions</td>
<td>141</td>
</tr>
</tbody>
</table>

**Chapter 6: Deferred Tax Asset Recognition**

_Ingeborg Lewis_ 143

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1.</td>
<td>Introduction</td>
<td>143</td>
</tr>
<tr>
<td>6.2.</td>
<td>Deferred tax assets</td>
<td>143</td>
</tr>
<tr>
<td>6.2.1.</td>
<td>Relevant deferred tax assets and GAAPs</td>
<td>143</td>
</tr>
<tr>
<td>6.2.2.</td>
<td>Recognizing a deferred tax asset</td>
<td>145</td>
</tr>
<tr>
<td>Section</td>
<td>Page</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>------</td>
<td></td>
</tr>
<tr>
<td>6.3. Deferred tax assets on unused tax losses and credits</td>
<td>147</td>
<td></td>
</tr>
<tr>
<td>6.3.1. Background</td>
<td>147</td>
<td></td>
</tr>
<tr>
<td>6.3.2. The threshold: “Probable”</td>
<td>148</td>
<td></td>
</tr>
<tr>
<td>6.3.3. History of recent losses</td>
<td>154</td>
<td></td>
</tr>
<tr>
<td>6.3.4. Convincing other evidence</td>
<td>155</td>
<td></td>
</tr>
<tr>
<td>6.3.5. Specific tax regimes</td>
<td>158</td>
<td></td>
</tr>
<tr>
<td>6.4. Tax rate to be used</td>
<td>160</td>
<td></td>
</tr>
<tr>
<td>6.5. Discounting</td>
<td>162</td>
<td></td>
</tr>
<tr>
<td>6.6. Netting</td>
<td>163</td>
<td></td>
</tr>
</tbody>
</table>

### Chapter 7: Tax Exposures

*Koen De Grave and Scott Miller*

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.1. Introduction</td>
<td>165</td>
</tr>
<tr>
<td>7.2. Basic theory and technical guidance</td>
<td>169</td>
</tr>
<tr>
<td>7.2.1. Identification of uncertain tax positions</td>
<td>169</td>
</tr>
<tr>
<td>7.2.2. Assessing probability (recognition)</td>
<td>173</td>
</tr>
<tr>
<td>7.2.2.1. Evidence to support recognition</td>
<td>175</td>
</tr>
<tr>
<td>7.2.2.1.1. Detection risk</td>
<td>177</td>
</tr>
<tr>
<td>7.2.2.1.2. Tax opinions and external evidence</td>
<td>177</td>
</tr>
<tr>
<td>7.2.2.1.3. Recognizing uncertainties related to valuation</td>
<td>179</td>
</tr>
<tr>
<td>7.2.3. Measuring risk</td>
<td>179</td>
</tr>
<tr>
<td>7.2.3.1. Measurement under US GAAP</td>
<td>179</td>
</tr>
<tr>
<td>7.2.3.2. Measurement under IFRS</td>
<td>181</td>
</tr>
<tr>
<td>7.2.3.3. Examples of US GAAP and IFRS recognition and measurement</td>
<td>183</td>
</tr>
<tr>
<td>7.2.3.3.1. Example of transfer pricing uncertain tax position</td>
<td>183</td>
</tr>
<tr>
<td>7.2.3.3.2. Binary tax position</td>
<td>185</td>
</tr>
<tr>
<td>7.2.4. Subsequent events</td>
<td>186</td>
</tr>
<tr>
<td>7.2.5. Effective settlement</td>
<td>187</td>
</tr>
<tr>
<td>7.2.6. Interest and penalties</td>
<td>190</td>
</tr>
<tr>
<td>7.2.6.1. Accounting policy election under US GAAP</td>
<td>190</td>
</tr>
<tr>
<td>7.2.6.2. Accounting policy election under IFRS</td>
<td>192</td>
</tr>
<tr>
<td>7.2.7. Financial statement disclosures</td>
<td>192</td>
</tr>
<tr>
<td>7.2.7.1. Reporting under US GAAP</td>
<td>192</td>
</tr>
<tr>
<td>7.2.7.1.1. Balance sheet classification</td>
<td>192</td>
</tr>
<tr>
<td>7.2.7.1.2. Disclosures reported at gross vs. net</td>
<td>193</td>
</tr>
</tbody>
</table>
7.2.7.1.3. Annual disclosures under US GAAP 195
  7.2.7.1.3.1. Accounting policy on classification of interest and penalties 195
  7.2.7.1.3.2. Total amount of interest and penalties recognized in the income statement and balance sheet 195
  7.2.7.1.3.3. Reasonably possible significant changes expected within 12 months 196
  7.2.7.1.3.4. Tax years still subject to examination by a major tax jurisdiction 197
  7.2.7.1.3.5. Amount that would affect the effective tax rate 197
  7.2.7.1.3.6. The gross tabular reconciliation of unrecognized tax benefits 198

7.2.7.2. Reporting under IFRS 199

7.3. Conclusion 202

Chapter 8: Disclosure Notes
Patrick van Gerven and Frank Imming 205

8.1. Introduction 205
8.2. Presentation versus disclosure 207
8.3. Presentation and disclosure requirements IAS 12 210
  8.3.1. Introduction 210
  8.3.2. Presentation 211
    8.3.2.1. Offsetting current taxes 211
    8.3.2.2. Offsetting deferred taxes 213
    8.3.2.3. Tax expense 214
8.3.2.4. Exchange differences on deferred foreign tax liabilities or assets 215

8.3.3. Disclosure 216
8.3.3.1. Total tax expense (income) 217
8.3.3.2. Effective tax rate reconciliation 219
8.3.3.3. Tax rates 222
8.3.3.4. Tax via equity and other comprehensive income 224
8.3.3.5. Overview of tax losses/non-recognized deferred tax assets 225
8.3.3.6. Investments in subsidiaries, branches and associates and interests in joint arrangements 227
8.3.3.7. Deferred taxes 229
8.3.3.8. Discontinued operations 232
8.3.3.9. Income tax consequences of dividends 235
8.3.3.10. Business combinations 239
8.3.3.11. Future taxable income 240
8.3.3.12. Tax contingencies and events after the reporting period 242

8.4. Non-IAS 12 presentation and disclosure requirements 245
8.4.1. Introduction 245
8.4.2. IAS 1: Presentation of financial statements 245
8.4.3. IAS 7: Statement of cash flows 255
8.4.4. IAS 10: Events after the reporting period 257
8.4.5. IFRS 3: Business Combinations 258
8.4.6. IFRS 8: Operating Segments 258

8.5. Conclusion 261

Chapter 9: Special Items

Mark Koek and Tjeerd van den Berg 263

9.1. Introduction 263
9.2. Initial recognition 263
9.2.1. General rule of initial recognition 263
9.2.2. Mergers 267
9.2.3. Assets carried at fair value 269
9.2.4. Change in tax status of the entity 270
9.2.5. Migration of an entity 271
9.2.6. Subsequent changes in value: Impact on the initial recognition exemption 273
9.3. Outside basis differences 274
<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.3.1.</td>
<td>What is an outside basis difference?</td>
<td>274</td>
</tr>
<tr>
<td>9.3.2.</td>
<td>Calculating deferred taxes on outside basis differences</td>
<td>277</td>
</tr>
<tr>
<td>9.3.2.2.</td>
<td>Impact of local tax treatment of the shareholder</td>
<td>278</td>
</tr>
<tr>
<td>9.3.2.3.</td>
<td>Impact of tax treaties</td>
<td>280</td>
</tr>
<tr>
<td>9.3.3.</td>
<td>Deferred tax assets in relation to unremitted retained earnings</td>
<td>281</td>
</tr>
<tr>
<td>9.3.3.1.</td>
<td>Withholding taxes and deferred tax assets on unremitted retained earnings</td>
<td>281</td>
</tr>
<tr>
<td>9.3.3.2.</td>
<td>Impairment of investments and deferred tax assets on unremitted retained earnings</td>
<td>283</td>
</tr>
<tr>
<td>9.4.</td>
<td>Business combinations</td>
<td>284</td>
</tr>
<tr>
<td>9.4.1.</td>
<td>Basic principles</td>
<td>284</td>
</tr>
<tr>
<td>9.4.2.</td>
<td>Acquisition method</td>
<td>286</td>
</tr>
<tr>
<td>9.4.2.1.</td>
<td>Identify the acquirer</td>
<td>286</td>
</tr>
<tr>
<td>9.4.2.2.</td>
<td>Determine the acquisition date</td>
<td>286</td>
</tr>
<tr>
<td>9.4.2.3.</td>
<td>Recognize and measure assets and liabilities</td>
<td>287</td>
</tr>
<tr>
<td>9.4.2.4.</td>
<td>Recognizing and measuring goodwill or bargain purchase</td>
<td>288</td>
</tr>
<tr>
<td>9.4.3.</td>
<td>Examples of business combination</td>
<td>289</td>
</tr>
<tr>
<td>9.4.3.1.</td>
<td>Examples of purchase price allocation</td>
<td>289</td>
</tr>
<tr>
<td>9.4.3.2.</td>
<td>Example of deferred tax in a share deal</td>
<td>290</td>
</tr>
<tr>
<td>9.4.3.3.</td>
<td>Example of deferred tax in an asset deal</td>
<td>293</td>
</tr>
<tr>
<td>9.4.3.4.</td>
<td>Example: Asset deal and share deal in one transaction</td>
<td>296</td>
</tr>
<tr>
<td>9.4.3.5.</td>
<td>Example: Identifiable assets – Fair value, no tax basis</td>
<td>298</td>
</tr>
<tr>
<td>9.4.3.6.</td>
<td>Example: net operating losses or tax credits in a business combination</td>
<td>300</td>
</tr>
<tr>
<td>9.4.4.</td>
<td>Specific disclosures for business combinations</td>
<td>302</td>
</tr>
<tr>
<td>9.5.</td>
<td>Share-based payments</td>
<td>303</td>
</tr>
<tr>
<td>9.5.1.</td>
<td>Different share-based payment transactions</td>
<td>303</td>
</tr>
<tr>
<td>9.5.2.</td>
<td>Objective and examples of share-based payment accounting (IFRS 2)</td>
<td>306</td>
</tr>
<tr>
<td>9.5.2.1.</td>
<td>Significant dates</td>
<td>306</td>
</tr>
<tr>
<td>9.5.2.2.</td>
<td>Equity-settled share-based payment transactions</td>
<td>307</td>
</tr>
<tr>
<td>9.5.2.3.</td>
<td>Cash-settled share-based payment transactions</td>
<td>309</td>
</tr>
<tr>
<td>Section</td>
<td>Page</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>------</td>
<td></td>
</tr>
<tr>
<td>9.5.3. Tax accounting consequences of share-based payment transactions</td>
<td>311</td>
<td></td>
</tr>
<tr>
<td>9.5.3.1. Tax accounting paragraphs</td>
<td>312</td>
<td></td>
</tr>
<tr>
<td>9.5.3.2. Tax accounting: Share-based payment transactions – examples</td>
<td>313</td>
<td></td>
</tr>
<tr>
<td>9.5.3.3. Cash-settled share-based payments: example</td>
<td>318</td>
<td></td>
</tr>
<tr>
<td>9.6. Other comprehensive income and discontinued operations</td>
<td>319</td>
<td></td>
</tr>
<tr>
<td>9.6.1. Other comprehensive income</td>
<td>319</td>
<td></td>
</tr>
<tr>
<td>9.6.1.1. Components of other comprehensive income</td>
<td>320</td>
<td></td>
</tr>
<tr>
<td>9.6.1.2. Changes in revaluation surplus</td>
<td>320</td>
<td></td>
</tr>
<tr>
<td>9.6.2. Discontinued operations</td>
<td>323</td>
<td></td>
</tr>
<tr>
<td>9.6.2.1. Definition and rationale</td>
<td>323</td>
<td></td>
</tr>
<tr>
<td>9.6.2.2. Scope</td>
<td>323</td>
<td></td>
</tr>
<tr>
<td>9.6.2.3. Measurement</td>
<td>324</td>
<td></td>
</tr>
<tr>
<td>9.6.2.4. Presentation and disclosures</td>
<td>326</td>
<td></td>
</tr>
<tr>
<td>9.7. Interim reporting</td>
<td>329</td>
<td></td>
</tr>
<tr>
<td>9.7.1. Interim reporting and accounting for income taxes</td>
<td>329</td>
<td></td>
</tr>
<tr>
<td>9.7.2. Determination of estimated weighted average tax rate</td>
<td>332</td>
<td></td>
</tr>
<tr>
<td>9.7.3. One-time events or discrete items</td>
<td>335</td>
<td></td>
</tr>
<tr>
<td>9.8. Convergence of US GAAP and IFRS; existing differences in</td>
<td>339</td>
<td></td>
</tr>
<tr>
<td>accounting for income taxes</td>
<td>339</td>
<td></td>
</tr>
<tr>
<td>9.8.1. Background of convergence</td>
<td>341</td>
<td></td>
</tr>
<tr>
<td>9.8.2. Differences in basic model</td>
<td>341</td>
<td></td>
</tr>
<tr>
<td>9.8.3. Differences in recognition and measurement</td>
<td>342</td>
<td></td>
</tr>
<tr>
<td>9.8.4. Differences with regard to specific items</td>
<td>343</td>
<td></td>
</tr>
<tr>
<td>9.8.4.1. Intra-group transactions</td>
<td>343</td>
<td></td>
</tr>
<tr>
<td>9.8.4.2. Revaluations of property, plant and equipment</td>
<td>345</td>
<td></td>
</tr>
<tr>
<td>9.8.4.3. Backward tracing</td>
<td>345</td>
<td></td>
</tr>
<tr>
<td>9.8.4.4. Foreign exchange differences on remeasurement</td>
<td>346</td>
<td></td>
</tr>
<tr>
<td>9.8.4.5. Unremitted retained earnings</td>
<td>346</td>
<td></td>
</tr>
<tr>
<td>9.8.4.6. Share-based payments</td>
<td>347</td>
<td></td>
</tr>
<tr>
<td>9.8.4.7. Uncertain tax positions</td>
<td>347</td>
<td></td>
</tr>
<tr>
<td>9.8.5. Differences in presentation</td>
<td>348</td>
<td></td>
</tr>
</tbody>
</table>
Chapter 10: Banks and Other Financial Institutions

Stephen Bruce and James Clark

10.1. Introduction 351
10.2. Specific tax accounting issues faced by banks 353
  10.2.1. Branch structures 353
  10.2.2. Financial instruments 354
    10.2.2.1. Background 354
    10.2.2.2. Asset accounting 356
    10.2.2.3. Liability accounting 358
    10.2.2.4. Example 359
  10.2.3. Share-based compensation 361
10.3. Specific tax accounting impact of regulatory regimes for banks 363
  10.3.1. Historical reference 363
  10.3.2. Role of the regulators 366
  10.3.3. Overview of capital requirements under the Basel Accords 367
  10.3.4. The application of the Basel III Framework 368
  10.3.5. Treatment of deferred tax assets under the Basel Accords 370
  10.3.6. US adoption of Basel III 375
  10.3.7. European adoption of Basel III 375
  10.3.8. Summary 377
10.4. Specific tax accounting impact of regulatory regimes for insurance companies 378
  10.4.1. Introduction 378
  10.4.2. Role of the regulators 378
  10.4.3. Treatment of deferred taxes under Solvency II 380
  10.4.4. Conclusion 384

Chapter 11: Case Study

Heather Jurek

Background 385
Additional information 385
ABC Foreign Subsidiary (FS) 388
ABC Global, Inc. consolidated financials 413
Chapter 1
Introduction to Tax Accounting

Tjeerd van den Berg* and Alycia Spitzmueller**

This chapter is based on information available up to 1 August 2014.

1.1. Introduction

For those seeking to embark on a journey to unravel the mystery of income taxes, the necessary guide has arrived. As this is the first publication on accounting for income taxes under the International Financial Reporting Standards (IFRS), it will serve such travellers well on this journey. This book integrates an explanation of the essence of tax accounting, touching on primary tax accounting terminology, regulators, as well as other factors such as the influence of media on income tax reporting, calls for transparency and the International Accounting Standards Board, which publishes the International Financial Reporting Standard. A 10-step methodology is presented to correctly compute, determine and disclose the consequences in the financial statement of a company.

Following this 10-step methodology, both newcomers and trained specialists will appreciate a framework presented for the calculation of the correct income tax expense and preparation of the required disclosures. In addition, all readers will be served well by the discussion of the theoretical background underlying significant income tax related questions and discussion points.

To ensure that the theory discussed in the 10-step methodology directly connects with actual practice, examples are offered that come directly from the practical experience of the various authors. The first and foremost objective is to explain clearly to the reader a methodology regarding how to structure the accounting for income\(^1\) taxes and to acquaint the reader with the theory and background of the various dogmas in the income tax standard.

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1. This irrespective of whether one is a preparer or auditor of (the income tax paragraph in) financial statements.
Chapter 1 - Introduction to Tax Accounting

In addition, the place that accounting for income taxes and the respective standard has in the current environment is depicted and explained. The world has changed rapidly, and financial accounting – especially tax accounting – attracts the attention of a variety of stakeholders compared to the late 1990s. At the end of 2014, it is fair to say that the call for transparency is louder than ever.

Finally, a publication that focuses on accounting for income taxes under the International Financial Reporting Standards would not be complete without an explanation of the position that these standards have in the world of financial accounting. Furthermore, the topics considered here require an explanation of the organizational structure and procedures applied by the standard setter – the International Accounting Standard Board (IASB) – to arrive at a new reporting standard or interpretation thereof.

This chapter explains the importance of accounting for income taxes. Key definitions will be presented, followed by an explanation of the 10-step plan and thus the core structure of the publication. Next, various initiatives are outlined that promote increased transparency and fairness in the payment of income taxes. Finally, the discussion shifts to the IASB as an organization, as well as the place that the International Financial Reporting Standards have in the world of financial accounting and how the Standards came to be in this position.

1.2. Importance of accounting for income taxes

Many people will ask what is the relevance or importance of accounting for income taxes. The quick answer is that income taxes generally are one of the largest line items on a company’s income statement. The more elaborate answer is that there are differences between the rules that govern financial accounting and the rules that govern tax. Thus, the question concerns whether those differences are permanent or temporary in nature and reflected correctly in the financial statements. This is generally seen as a complex exercise that needs to be performed by tax accounting professionals.

The complexity increases and, thus, the importance, if one looks at accounting for income taxes in the context of multinational companies. The main reason is that tax law is applicable on a jurisdictional basis and differs from

2. For instance, the IFRS.
one jurisdiction to the next around the world, while the rules that govern financial accounting provide for a single set of reporting standards that are globally applicable. This, combined with the fact that income and other taxes impact multiple areas of business and are embedded through many line items in financial statements, makes taxes and – therefore the accounting for income taxes – a key risk area for many companies.

Tax accountants know and understand tax complexities such as transfer pricing, cross-border issues, hybrid loans and transparent entities. Furthermore, they know and understand the respective differences – either permanent or temporary in nature – that can arise between the principles used for financial reporting and those established by tax law. As can be seen in financial statements – even in single-entity financial statements – the reported tax expense seldom reflects the profit before tax multiplied by the statutory tax rate. Tax accountants focus on those differences. Basically, tax accounting is the fine art of connecting and reflecting the two worlds of financial accounting and tax in the financial statements.

1.3. Primary tax accounting terminology

Before embarking on the tax provision process, it is helpful to understand the objective of the accounting for income taxes standard. The International Financial Reporting Standards³ explicitly state that their purpose is to prescribe the accounting treatment for income taxes. Specifically, the question concerns how to account for the current and future tax consequences of:

– the future recovery (settlement) of the carrying amount of assets (liabilities) that are recognized in an entity’s statement of financial position; and
– transactions and other events of the current period that are recognized in an entity’s financial statements.

It is inherent in the recognition of an asset or liability that the reporting entity expects to recover or settle the carrying amount⁴ of that asset or liability.

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³ The standard that governs income taxes is IAS 12.
⁴ Also, the book value reported in the financial statements.
A firm grasp of the most relevant (tax) accounting terms is also essential to understanding the tax provision process. These terms are considered below, following the structure of the financial statements. According to IAS 1, a complete set of financial statements consists of the following six elements:

**A statement of financial position as at the end of the period.** When looking at the statement of financial position (balance sheet) from a tax accounting perspective, the emphasis is on current and deferred tax assets and liabilities. Current tax assets and liabilities represent amounts payable to, or receivable from, taxing authorities at the reporting date. These amounts are based on the taxable profit (or loss) for the past and current period.

Deferred tax assets and deferred tax liabilities reflect the future tax consequences of temporary differences between the carrying values (or book basis) of assets and liabilities recognized on the balance sheet and their respective tax basis. A deferred tax asset represents the amount of taxes expected to be received or recovered in the future as a result of (i) deductible temporary differences and (ii) the carry-forward of unused tax losses and/or tax credits. A deferred tax liability reflects the amount of income tax expected to be paid/incurred in the future as a result of the reversal of taxable temporary differences. All deferred tax balances are classified as non-current.

**A statement of comprehensive income for the period.** When looking at the statement of comprehensive income (income statement) from a tax accounting perspective, the emphasis is on current and deferred tax expense. Tax expense/(income) is the aggregate amount included in the determination of profit and loss for the period in respect of current and deferred tax. Current tax expense/(income) is the amount an entity expects to pay/(receive) based on taxable profits/(losses) arising in the reporting period. Deferred tax expense represents the amount expected to be received and/or paid in the future as a result of temporary differences originating and reversing in the reporting period.

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5. IFRS do not contain a single list of definitions. Rather, all individual standards contain their own relevant definitions. Those listed here are predominantly found in IAS 1 and IAS 12.
6. IAS 1, para. 10.
7. IAS 12, para. 5.
8. The tax basis of an asset or liability is the amount attributed to that asset or liability for tax purposes.
9. IAS 12, para. 5.
A statement of changes in equity for the period. When looking at the statement of changes in equity for the period, the emphasis is on the current or deferred tax expense or receivable that is recorded directly in equity or in other comprehensive income (OCI), and thus not in the statement of comprehensive income. This is because, under IFRS, current and deferred tax is to be recognized outside profit or loss if the tax relates to items that are recognized, in the same or different period, outside profit or loss.\textsuperscript{10}

A statement of cash flows for the period. The statement of cash flows provides information about the changes in cash and cash equivalents during the reporting period, and requires that cash flows during the period be classified as pertaining to (i) operating, (ii) investing or (iii) financing activities. Income taxes are generally classified as pertaining to operating activities. Additionally, cash outflows for income tax payments made to tax authorities during the reporting period must be separately disclosed in the statement of cash flows or in the notes to the financial statements. In principle, cash flows arising from taxes on income are to be classified as cash flows from operating activities.\textsuperscript{11}

Notes, consisting of a summary of significant accounting policies and other explanatory information. From a tax accounting perspective, a key aspect is the required disclosure notes on income taxes.\textsuperscript{12} For a complete overview and discussion of the respective disclosures, see chapter 8.

A statement of financial position as at the beginning of the earliest comparative period when an entity applies an accounting policy retrospectively or makes a retrospective restatement of items in its financial statements, or when it reclassifies items in its financial statements. This element does not have specific\textsuperscript{13} tax accounting relevance.

1.4. How are income taxes accounted for?

Because there is no checklist provided in IAS 12, this book will introduce a 10-step methodology to correctly compute, determine and disclose income tax consequences in the financial statements of a company. Throughout the book, detailed explanations and clear examples are provided on all the

\textsuperscript{10} IAS 12, para. 61A.
\textsuperscript{11} IAS 7, paras. 35-36.
\textsuperscript{12} IAS 12, para. 79 et seq.
\textsuperscript{13} In addition to what is stated under Statement of financial position as at the end of the period, above.
individual steps that are to be taken to come to correct financial statements. The 10-step methodology is generally applicable to all (international) financial reporting standards, and although this book is based upon the IFRS and the respective standard on income taxes (i.e. IAS 12), this book is useful for both IFRS, US Generally Accepted Accounting Principles (GAAP) and local GAAP filers. Also, it does not matter whether one applies the 10-step methodology as part of the preparation of financial statements or the auditing thereof. Lastly, once the financial statements of a company are prepared in accordance with IFRS, the 10-step methodology is generically applicable. Essentially, the methodology is blind as regards the number of entities and/or jurisdiction in which a company is active. Indeed, the methodology is as applicable to a single entity as it is to 500.

The 10 steps are presented in chronological order in the chapters of this book. Some chapters contain more than one step, but most deal with a single step. The following steps can be distinguished:

- identify book-to-tax differences;
- calculate the current tax expense for the period;
- calculate any adjustments to prior years’ tax expense;
- calculate the deferred tax asset or liability as at the close of the reporting period;
- assess any deferred tax assets for recognition;
- identify, recognize and measure any uncertain tax positions;
- reconcile the income tax accounts;
- calculate the total tax expense/(income) and allocate to (i) the statement of profit or loss, (ii) other comprehensive income or (iii) equity as appropriate;
- prepare the effective tax rate reconciliation; and
- prepare the relevant disclosures.

These steps are explained below.

**Step 1: Identify the book-to-tax differences (chapter 3)**

The starting point for all tax (accounting) calculations is the “commercial” profit before tax. Therefore, the first step is to identify whether tax law demands or creates a difference in tax treatment as compared to how a certain transaction was treated and recorded under the applied accounting standard. Such differences are either permanent or temporary in nature.

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14. Or US GAAP.
Regarding the difference between permanent and temporary differences:\textsuperscript{15}
\begin{itemize}
\item permanent differences will not reverse;
\item temporary differences will reverse, in a future period;
\item permanent differences are generally found on the income statement; and
\item temporary differences are generally found on the balance sheet.\textsuperscript{16}
\end{itemize}

There are multiple ways to identify permanent and temporary differences, for example:
\begin{itemize}
\item understand the connection between the financial reporting carrying value of items in the statement of financial position and the corresponding tax basis;
\item discuss transactions that occurred during the year (e.g. acquisitions, divestitures); and
\item review prior years’ tax returns and provisions for continuing differences (in Dutch tax returns, one can check for differences between the tax balance sheet and the book balance sheet).
\end{itemize}

**Step 2: Calculate the current tax expense (chapter 4)**

The second step consists of computing an estimation of the tax expense, beginning with profit before tax as reported under the applicable reporting standard\textsuperscript{17} and identifying both permanent and temporary differences. If the corporate income tax return is not based on IFRS/US GAAP,\textsuperscript{18} but on another local GAAP, it may be easiest to break this step into two parts: identifying the permanent and temporary differences to estimate profit before tax under the applicable local GAAP,\textsuperscript{19} and then identifying permanent and temporary differences between local GAAP and taxable profits for the period.

\textsuperscript{15} For a detailed outline and discussion of this first step, see chapter 3.
\textsuperscript{16} This means that a proper understanding of how and where items are reported for GAAP and IFRS purposes will aid in the effective application of IFRS and/or US GAAP.
\textsuperscript{17} Generally, IFRS or US GAAP.
\textsuperscript{18} Which is hardly the case.
\textsuperscript{19} Differences between local GAAP and IFRS/US GAAP are generally “temporary” in nature.
Chapter 1 - Introduction to Tax Accounting

The calculation can be broken down as follows:

\[
\text{Profit before tax (IFRS/US GAAP)} \\
\pm \text{ Permanent differences} \\
\pm \text{ Temporary differences} \\
= \text{ Profit before tax (local GAAP)} \\
\pm \text{ Permanent differences} \\
\pm \text{ Temporary differences} \\
= \text{ Taxable Income} \\
\times \text{ Substantively enacted tax rate}^{20} \\
= \text{ Current tax expense}^{21}
\]

Calculating the current tax expense is thus equivalent to preparing the current year tax return. There is no guidance provided by IAS 12 for this process. It basically comes down to applying (local) tax law to the current year results. Examples of other items that impact the overall tax expense include credits; offsetting losses; and different jurisdictions and their different rates.

**Step 3: Calculation of adjustments to prior years’ tax expense:**
**Return-to-accrual adjustments and true-ups (chapter 4)**

There may be a need to correct the calculated current tax expense as determined in previous periods. These adjustments could occur due to improved and/or additional knowledge gained in relation to the tax position taken in the published financial statements. Although not often seen in practice, the authors would like to introduce a different use of the terms “return-to-accrual adjustments” and “true-ups”.

*Return-to-accrual adjustments.* A return-to-accrual adjustment is an adjustment to a prior year’s tax expense before and/or upon filing the tax return. There are estimates inherent in the tax provision process which may subsequently change due to subsequent rulings,^{22} a change in tax law or a court ruling or – as is most often the case – because a more accurate calculation is possible compared to the preliminary estimate that was used to calculate the income tax expense at year-end. Ultimately, when the income tax return is filed, the current and deferred tax balances recognized in the financial

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20. Under US GAAP, the enacted tax rate is to be used.
21. IAS 12, para. 5.
22. Meaning a specific agreement with the tax authorities, mostly as regards an item that is subject to multiple interpretations.
How are income taxes accounted for?

Statements must be updated to reflect the filing position. This may result in adjustments to both current and deferred taxes payable/(receivable). Adjustments made up to the ultimate moment of filing the corporate income tax return are referred to here as return-to-accrual adjustments.

True-up adjustment. The authors introduce an unofficial distinction between an adjustment before and/or upon filing the return and an adjustment after filing the corporate income tax return. This can arise, for instance, due to a deviating income tax assessment, a tax audit or a closed compromise with the tax authorities. All adjustments after filing the corporate income tax return are referred to here as true-up adjustments.23

Step 4: Calculate the deferred taxes at the reporting date (Chapter 5)

The recognition of deferred tax is based on the principle that the tax effects of transactions recognized in the financial statements should be recognized in the same period as the transactions themselves, even if recognition in the income tax return is in a subsequent period. In this situation, when transactions are recognized for financial reporting purposes in different periods than the tax return, temporary differences are generally created.

It is inherent in the recognition of an asset or liability that the entity expects to recover or settle the carrying amount of that asset or liability. If the recovery or settlement of that carrying amount will make future tax payments larger (or smaller), deferred taxes must be recognized.

An entity analyses each of its assets and liabilities by comparing the carrying value with its tax basis. The carrying amount is the amount for which an asset or liability is recognized on the balance sheet.24 The tax basis is the amount attributed to an asset or liability for tax purposes. Generally, this is the value attributed to an asset or liability in the tax return in determining whether cash flows resulting from the recovery/(settlement) of the entity’s assets and liabilities will be taxable/(deductible).

23. US GAAP uses true-up adjustments for all adjustments up to filing the corporate income tax return, and uses prior-year adjustments for adjustments after the moment of filing the corporate income tax return.
24. There is a difference between IFRS and GAAP, in that the IFRS carrying amount is equal to the amount recognized on the IFRS balance sheet, while the local GAAP carrying amount is equal to the amount recognized on the local GAAP balance sheet.
In this fourth step, the temporary differences that were analysed in Step 1 are multiplied by the appropriate tax rate to calculate deferred assets and liabilities. The tax effects of unused tax losses and unused tax credits are also identified and considered.\textsuperscript{25} Generally speaking, the change in an entity’s deferred tax position on the opening and closing balance sheet dates (generally resulting from the origination and reversal of temporary differences in the current period) is the deferred tax expense/(income) for the period. For exceptions to this rule, see chapter 5.

**Step 5: Measurement of the deferred tax asset (chapter 6)**

Deferred tax liabilities are recognized for all taxable temporary differences, subject to limited exceptions discussed in chapter 9.\textsuperscript{26} Deferred tax assets, however, are recognized in the financial statements to the extent that it is probable that sufficient taxable profits will be available against which the deductible temporary difference (or tax loss or credit) can be utilized.\textsuperscript{27} For this reason, an entity with deferred tax assets must evaluate its sources of future taxable profit as part of its income tax provision process in order to determine whether they must be recognized.

IAS 12 provides several criteria in assessing the probability that taxable profit will be available in the future,\textsuperscript{28} namely:
- taxable temporary differences;
- taxable profits;
- losses that are identifiable and unlikely to recur; and
- tax planning opportunities.

\textsuperscript{25} IAS 12, para. 13 (the benefit relating to a tax loss that can be carried back to recover current tax of a previous period shall be recognized as an asset). IAS 12, para. 34 (a deferred tax asset shall be recognized for the carry forward of unused tax losses and unused tax credits to the extent that it is probable that future taxable profit will be available against which the unused tax losses and unused tax credits can be utilized).
\textsuperscript{26} Chapter 9, para. 1, the initial recognition exemption.
\textsuperscript{27} IAS 12, paras. 34-36.
\textsuperscript{28} IAS 12, para. 36.
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