Example taxation impact of use of a corporate partner by disposing of goodwill

No Planning

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(28)

300

Planning with corporate partner

Current Director's Current account account Loan Account Reserves £'000 £'000 £'000 £'000 Brought forward 0 0 0 0 Sale of goodwill to corporate partner 0 0 200 0 Profit 100 10 0 90 Goodwill write-off 0 0 0 (50)Tax (40)0 0 (18)Drawings (50)0 (50)0 10 150 22 10 Profit 100 10 0 90 Goodwill write-off 0 0 (50) 0 0 Tax (40)0 (18)Drawings (50)0 (50)0 20 20 100 44 Profit 100 10 0 90 Goodwill write-off 0 0 (50)0 (40)0 0 (18)Tax Drawings (50)0 (50) 0 30 30 50 66 Profit 100 10 0 90 Goodwill write-off 0 0 0 (50)0 0 (18)Tax (40)(50) 0 (50) Drawings 0 88 40 40 0 Total paid out by the firm 400 Total paid out by the firm (200+40+88+72)400 Total received by partner (200 + 40)Total received by partner (200+40+88) 328 240

The above highlights general themes of the use of a corporate partner structure in order to understand the concept. Tax rates have been approximated. The corporate partner structure can be used in many different ways and our input should be sought in order to implement the most appropriate and efficient use of the structure for your specific circumstances. No responsibility can be accepted by Armstrong Watson for any loss occasioned by any person acting or refraining from action on the basis of this paper.

Less: CGT

Net total received by partner

Example taxation impact of use of a corporate partner by general ongoing tax savings

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	<u>No Planning</u>	Planning with corporate partner			
	Current account	Current account	Director's Loan Account	Reserves	
Brought forward Profit Drawings Tax	£'000 0 100 (50) (40) 10	£'000 0 10 0 0 10	£'000 0 0 0 0	£'000 0 90 (50) (14) 26	
Profit Drawings Tax	100 (50) (40) 20	10 0 20	0 0 0	90 (50) (14) 52	
Profit Drawings Tax	100 (50) (40) 30	10 0 <u>0</u> 30	0 0 0 0	90 (50) (14) 78	
Profit Drawings Tax	100 (50) (40) 40	10 0 <u>0</u> 40	0 0 0	90 (50) (14) 104	
Total paid out by the firm	400	Total paid out by the firm (200+40+104+32)			376
Total received by partner (200 + 40)	200	Total received by partner (200+40+104-24) Less: CGT Net total received by partner			320 (10) 310

The above highlights general themes of the use of a corporate partner structure in order to understand the concept. Tax rates have been approximated. The corporate partner structure can be used in many different ways and our input should be sought in order to implement the most appropriate and efficient use of the structure for your specific circumstances. No responsibility can be accepted by Armstrong Watson for any loss occasioned by any person acting or refraining from action on the basis of this paper.