

# MANDATORY DISCLOSURE OF CERTAIN TRANSACTIONS (MARKETER)

## Form MD6



In accordance with Chapter 3 of Part 33 of the Taxes Consolidation Act 1997

This form should be completed by a **marketer** who is marketing a transaction that it would be reasonable to consider is a disclosable transaction and who has not been provided with a transaction number in relation to that disclosable transaction (as required by section 817L(4) of the Taxes Consolidation Act 1997), (Note 1).

and returned to:-

**Office of the Revenue Commissioners**  
**Mandatory Disclosure Unit**  
**Large Cases - High Wealth Individuals Division**  
**Castle View**  
**52/57 South Great George's Street**  
**Dublin 2, D02 HF50**

### Internal use only

Transaction no:

Date Received:

The completed form must be received within 30 working days after making the first marketing contact in relation to the transaction (as required by section 817L(4) of the Taxes Consolidation Act 1997).

Receipt of completed form will be acknowledged promptly.

Any Taxpayer submitting a mandatory disclosure can do so via MyEnquiries by including [mandatorydisclosures@revenue.ie](mailto:mandatorydisclosures@revenue.ie) in the FAO section.

Guidance on the mandatory disclosure regime is available at [www.revenue.ie](http://www.revenue.ie)

### 1. Promoter Details (please complete in BLOCK CAPITALS)

Full Name:

Business Address:  
(Incl. Eircode)

E-mail Address, if any:

Telephone Number:

Tax Advisor Identification Number (TAIN) if applicable:

Tax Reference Number (See Note 2):

**Revenue**

Cáin agus Custaim na hÉireann  
Irish Tax and Customs



Transaction no: 

## 2. Specified Descriptions

From the following list, please indicate the specified description which applies to this transaction. Where more than one description applies, please indicate all such descriptions:

Confidentiality (s.817DA(2))	<input type="checkbox"/>	Employment Schemes (s.817DA(7))	<input type="checkbox"/>
Fees (s.817DA(3))	<input type="checkbox"/>	Income into Capital Schemes (s.817DA(8))	<input type="checkbox"/>
Standardised Tax Products (s.817DA(4))	<input type="checkbox"/>	Income into Gift Schemes (s.817DA(9))	<input type="checkbox"/>
Loss Schemes - Individuals (s.817DA(5))	<input type="checkbox"/>	Discretionary trusts (s.817DA(10))	<input type="checkbox"/>
Loss Schemes - Companies (s.817DA(6))	<input type="checkbox"/>		

## 3. Transaction Details

3.1. Name (if any) by which transaction is known:

3.2. Date on which marketing contact was made:

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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3.3. Summary of transaction:

Transaction no:

**3.4. Detailed Description**

Full details of each element of the transaction. The information provided should be sufficient to enable the Revenue Commissioners to understand precisely how the scheme operates or is intended to operate.

(If more space is required, please continue on Form MD3 (continuation sheet))

**4. Relevant Provisions of the Acts (See Note 2)**

Full reference to the provisions of the Acts which are considered to be relevant to the treatment of the transaction for tax purposes:

(If more space is required, please continue on Form MD3 (continuation sheet))

Transaction no:

### 5. How the Relevant Provisions of the Acts apply to the Transaction

Full details of how in the opinion of the promoter, each of the relevant provisions of the Acts referred to above apply, or do not apply, to the transaction.

(If more space is required, please continue on Form MD3 (continuation sheet))

### 6. Other information

Any other information which the marketer used to make a marketing contact in relation to the transaction. Please indicate if any documents are attached to this form.

### 7. Declaration

The information I have given on this form and any continuation sheets is correct and complete to the best of my knowledge and belief.

Signature:

Name of Signatory:

Capacity in which signed:

Date:

Number of Forms MD3 (continuation sheet) used:

# NOTES

## Note 1.

A marketer may not have all of the information required by this form. A marketer is therefore required to complete this form as far as is possible, based on the information available to the marketer in relation to the transaction which it would be reasonable to consider is a disclosable transaction.

## Note 2.

Tax Reference Number is defined in section 817D of the Taxes Consolidation Act 1997 as follows:

- in the case of an individual, the individual's PPSN, and
- in any other case -
  - the reference number stated in any return of income form or notice of assessment issued to the person by the Revenue Commissioners, or
  - the registration number of the person for the purposes of value-added tax.

## Note 3.

The Acts are defined in section 817D of the Taxes Consolidation Act 1997 as follows:

- the Tax Acts,
- the Capital Gains Tax Acts,
- Part 18D of the Taxes Consolidation Act 1997,
- the Value-Added Tax Consolidation Act 2010 and the enactments amending or extending that Act,
- the Capital Acquisitions Tax Consolidation Act 2003 and the enactments amending or extending that Act,
- the Stamp Duty Consolidation Act 1999 and the enactments amending or extending that Act,
- the statutes relating to the duties of excise and the management of those duties,

and any instruments made thereunder and any instruments made under any other enactment relating to tax.

The Revenue Commissioners collect taxes and duties and implement customs controls. Revenue requires customers to provide certain personal data for these purposes and certain other statutory functions as assigned by the Oireachtas. Your personal data may be exchanged with other Government Departments and agencies in certain circumstances where this is provided for by law. Full details of Revenue's data protection policy setting out how we will use your personal data as well as information regarding your rights as a data subject are available on our **Privacy** page on [www.revenue.ie](http://www.revenue.ie). Details of this policy are also available in hard copy upon request.

The information in this document is provided as a guide only and is not professional advice, including legal advice. It should not be assumed that the guidance is comprehensive or that it provides a definitive answer in every case.