Submission of iXBRL Financial Statements as part of Corporation Tax Returns

Part 41A-03-01

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This Tax and Duty Manual (TDM) provides details of the obligations of certain Corporation Tax (CT) filers to submit electronic Financial Statements with the CT Return. The option to file electronic Financial Statements is also available to other Taxpayers on a voluntary basis. This TDM is of particular relevance to CT customer service staff, staff in audit and case profiling areas, ROS Helpdesk staff and ROS Liaison Officers. Customer Service staff in Income Tax areas should also be aware of this TDM.

Part 7 of this TDM provides a description of the queries to be handled by-

- Revenue Operational Branches
- iXBRL Helpdesk
- ROS Helpdesk.



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.

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1. Introduction

1.1. Corporation Tax - change in legislation:

Section 884 of the Taxes Consolidation Act 1997 (TCA) extends the definition of a CT Return to encompass Financial Statements. This, coupled with the <u>existing e-filing legislation</u>, establishes a statutory basis for the mandatory submission of electronic Financial Statements¹ as part of the tax return.

All companies that are required to prepare accounts under the Companies Act 2014 must submit their Financial Statements in iXBRL format to Revenue. However, Revenue has progressively mandated the submission of Financial Statements in iXBRL format on a phased basis for CT filers. Sections 1.3 and 3 below explain in further detail who is affected by the requirements.

Further detail on the relevant legislative provisions is available in <u>Appendix I</u> of this document.

1.2. Why iXBRL?

Financial Statements contain key data needed for the purposes of assessing possible tax risks. The ability to accept Financial Statements in machine-readable format via ROS greatly enriches the data set available to Revenue for the purposes of risk analysis. The electronic data received allows Revenue to:

- a) Compare key accounting ratios across companies;
- b) Automatically prepare company profiles;
- c) Automatically generate statistical information for management purposes;
- d) Perform basic audit checks / reconciliations (e.g. reconciling loss relief/claims within a group); and
- e) Develop predictive analytical models to identify tax risk.

In addition, electronic Financial Statements will be available to help caseworkers prepare for audits and other Revenue compliance interventions.

1.3. Who is affected?

The obligation to file electronic Financial Statements was introduced on a phased basis. All CT Payers meeting the Phase I or Phase II criteria (outlined in Part 2.1 below) are affected by the changes. These include:

- Irish Tax Resident Companies
- Parents and Subsidiaries
- Branches/Agencies of Non-Resident Companies
- Companies not bound by the Companies Acts

¹ Mandatory filing of Financial Statements is being phased in. Further details are set out in Part 2.1

Inactive companies and companies in liquidation may not be required to file electronic Financial Statements with their Form CT1. However, in exceptional circumstances, Revenue retains the right to request electronic Financial Statements from such companies. The practical means of applying for these waivers are described in Parts 1.3.1, 1.3.2, 1.3.3 and 3 below.

1.3.1. Companies in liquidation

In general, it will be for Revenue Operational Branches to decide whether iXBRL Financial Statements in liquidation cases are required in addition to the Form CT1. The decision-making process in this regard should be the same as is currently applied in waiving the obligation to file a Form CT1 electronically. Revenue will apply the following where a Form CT1 is filed:

Companies in liquidation (not a voluntary liquidation)

For companies in liquidation, where there are no net assets for distribution, Revenue will accept that an iXBRL return need not be filed and the "Extracts from Accounts" on the Form CT1 should be fully completed instead.

However, Revenue retains the right to request that an iXBRL return is filed in specific cases. Specific requests for filing the iXBRL return are more likely to be made where the company is not compliant in respect of Form CT1 obligations up to the date of liquidation.

Companies in liquidation with no net assets for distribution should select Option 5 on the Form CT1; see Part 3 for further information.

Voluntary liquidations

For companies in voluntary liquidation, where the net assets for distribution do not exceed €25,000, and provided that all obligations under company law and all tax related requirements have been fulfilled up to the date of liquidation, applications to waive the iXBRL filing obligation may be made on a case-by-case basis to the relevant Branch Manager. Where the application is accepted, the waiver of the obligation to file the iXBRL return will be noted on Revenue's systems. Applications for a waiver should be made via MyEnquiries please select the "Corporation Tax" and "iXBRL" drop-down categories.

It should be noted that this applies to both the pre-liquidation and liquidation periods.

1.3.2. Inactive companies

At present all companies that are registered in Ireland have an obligation under the Companies Act 2014 (previously Companies Act 1963) to prepare and make out accounts. Revenue is willing to waive the obligation to file Financial Statements in iXBRL format where a company is inactive.

Revenue will classify a company "inactive" where there is no activity in the accounting period. It is considered that there is no activity in the accounting period and hence a company is not required to submit accounts in iXBRL format where the following conditions are met:

1. No income or expenses on the Statement of Profit or Loss (annual CRO and audit fees can be ignored); and

2. A Statement of Financial Position / Balance Sheet movement of less than €500, except in the first year after the company becomes inactive where it is paying off its trade creditors and has not been previously obliged to file Financial Statements in iXBRL format.

Inactive companies may select an option on the iXBRL page on the Form CT1 as follows:

'The company is inactive and there is no income or expenses on the Profit and Loss account and there is a balance sheet movement of less than €500.'

Where this option is selected on the Form CT1, it will not be necessary to contact the local Revenue Office. It should be noted that companies who are in Revenue's Large Cases Division (LCD) may also avail of this waiver.

1.3.3. Companies that have applied for voluntary strike-off

If a company has ceased to trade, or has never traded, and has no outstanding creditors, it can request that the Registrar strike off the company. Companies in this situation whose tax affairs are dealt with in LCD are obliged to submit a Detailed Profit or Loss (DPL) account and Statement of Financial Position/Balance Sheet in iXBRL format. They should do this by selecting "Option 2" on the Form CT1:

Option 2 - My tax affairs are dealt with in Revenue's Large Corporates Division or I am not excluded from filing	
financial statements in iXBRL format under options 3, 4 or 5 below	30-0

Figure 1 - Option 2 on the Form CT1

Next, they should tick the following box on the "Company Category" panel and provide a DPL account and Statement of Financial Position/Balance Sheet in iXBRL format:

Form CT1 Filer-	Auditors	Directors	DPL*	Balance	Disclosure
Company Category	Report	Report		Sheet	Notes
Tax resident in Ireland - not required to prepare and publish financial statements under legislation in country of incorporation or in Ireland.	3/2	V .	Yes	Yes	

All other companies that have applied for voluntary strike-off may avail of a waiver from iXBRL filing by selecting Option 3 on the Form CT1:

Option 3 - My tax affairs are not dealt with in Revenue's Large Corporates Division and I am not mandated under Phase II to file financial statements in iXBRL format because each of the following three criteria apply to me and I am claiming an exclusion

- the Statement of Financial Position / Balance Sheet total (aggregate of assets without deduction of liabilities) of the company does not exceed €4.4 million
- the amount of the turnover of the company does not exceed €8.8 million and
- The average number of persons employed by the company, calculated in accordance with Sec. 317 of the Companies Act 2014, does not exceed 50

Figure 2 - Option 3 on the Form CT1

1.4. The format of electronic Financial Statements

Revenue has adopted the internationally recognised iXBRL standard for accepting electronic Financial Statements. XBRL stands for eXtensible Business Reporting Language. This is a language that allows the presentation of financial information in a computer-readable format. This is achieved by tagging each piece of financial information with a label that identifies it in terms of standard accounting or tax concepts. The XBRL "language" is interpreted through "taxonomies", which are essentially dictionaries that identify the meaning of each tag.

Standard XBRL is presented as a series of tags and numbers. iXBRL, or inline XBRL, is a more recent version of the language, which allows financial information to be presented in a format that is both human-readable and machine-readable. This is achieved by presenting the data (e.g. Financial Statements) in a normal document format but with XBRL "tags" embedded in the soft copy document.

It should be noted that iXBRL does not change accounting standards. It is simply a language for transmitting information that accurately reflects data reported under GAAP and IFRS.

Financial Statements in iXBRL format may be submitted in the Irish language through Revenue's On-Line Service (ROS), which may be accessed and operated through Irish or English. However, it should be noted that the iXBRL taxonomies which Revenue will accept have been developed in English.

Financial Statements must be submitted in iXBRL format; other formats, such as PDF or Word documents, are not acceptable.

At present, tax computations cannot be submitted in iXBRL format.

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]

1.5. Tagging

Tagging involves the application of computer-readable 'tags' to business data. This enables the data to be processed and analysed automatically by software. For example, 'tags' allow items of data such as Gross Profit, Stock, Creditors, etc. to be identified for the production of management reports or Financial Statements.

Data which is listed in a Financial Statement but is not reported, such as data represented by a dash, zero or a blank in a table, need not be tagged. However, if, for example, a mandatory iXBRL item is represented in the Financial Statements / DPL as a dash or zero, it must be tagged, as otherwise the file will not pass basic validation. See Part 3.1.3 below for further information on mandatory items in iXBRL submissions.

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]

1.6. Taxonomies

iXBRL tags are interpreted by reference to "taxonomies", which are open source documents published on the internet. A taxonomy is, in essence, a dictionary linking each tag with the accounting concept it identifies. Like the Financial Statements, taxonomies reflect the standards known as Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IFRS). For example, in the Irish FRS 102 extension taxonomy, the tag ProfitLossOnOrdinaryActivitiesBeforeTax denotes a company's profit or loss before the charge to tax.

In ROS it is only possible to submit iXBRL files that have been tagged by reference to specific taxonomies that are accepted by Revenue, and a list of these is shown below.

Taxonomy	Taxonomy Version	Schema Reference	Applies to Financial Statements
FRS 101 Irish	Final	https://xbrl.frc.org.uk/ireland/FRS-101/2022-01- 01/ie-FRS-101-2022-01-01.xsd	Commencing on or after 1
Extension 2022			January 2018

FRS 102 Irish Extension 2022	Final	https://xbrl.frc.org.uk/ireland/FRS-102/2022-01-01/ie-FRS-102-2022-01-01.xsd	Commencing on or after 1 January 2019
EU IFRS Irish Extension 2022	Final	https://xbrl.frc.org.uk/ireland/IFRS/2022-01-01/ie-IFRS-2022-01-01.xsd	Commencing on or after 1 January 2018
FRS 101 Irish Extension 2019	Final	https://xbrl.frc.org.uk/ireland/FRS-101/2019-01- 01/ie-FRS-101-2019-01-01.xsd	Commencing on or after 1 January 2018
FRS 102 Irish Extension 2019	Final	https://xbrl.frc.org.uk/ireland/FRS-102/2019-01-01/ie-FRS-102-2019-01-01.xsd	Commencing on or after 1 January 2019
EU IFRS Irish Extension 2019	Final	https://xbrl.frc.org.uk/ireland/IFRS/2019-01-01/ie-IFRS-2019-01-01.xsd	Commencing on or after 1 January 2018
FRS 101 + DPL	Final	https://raw.githubusercontent.com/revenue- ie/dpl/master/schemas/ct/combined/2017-09- 01/IE-FRS-101-IE-DPL-2017-09-01.xsd	Commencing on or after 1 January 2015
FRS 102 + DPL	Final	https://raw.githubusercontent.com/revenue-ie/dpl/master/schemas/ct/combined/2017-09-01/IE-FRS-102-IE-DPL-2017-09-01.xsd	For periods commencing on or after 1 January 2015
EU IFRS + DPL	Final	https://raw.githubusercontent.com/revenue- ie/dpl/master/schemas/ct/combined/2017-09- 01/IE-EU-IFRS-IE-DPL-2017-09-01.xsd	Commencing on or after 1 January 2015
IE IFRS	Rec	http://www.xbrl-ie.net/public/ci/2012-12-01/ifrs/core/2012-12-01/ie-ifrs-full-2012-12-01.xsd	Ended on or before 31 December 2014
IE GAAP	Rec	http://www.xbrl-ie.net/public/ci/2012-12- 01/gaap/core/2012-12-01/ie-gaap-full-2012-12- 01.xsd	Ended on or before 31 December 2014

The taxonomy list and versions accepted by Revenue may change over time, in line with changes to the accounting frameworks in operation in Ireland. Revenue believes it is desirable for all stakeholders to make use of new taxonomies at the earliest opportunity to ensure that Financial Statements are tagged using the taxonomy aligned to the accounting framework under which the Financial Statements are produced. Accordingly, as new taxonomies become available, Revenue will determine a schedule for the adoption of each new taxonomy and the restriction of superseded taxonomies on a case-by-case basis, affording reasonable time to stakeholders to update their software and practices. Restrictions of superseded taxonomies will be notified by way of eBrief.

No private taxonomy extensions will be accepted by Revenue. For further information on the taxonomies currently accepted please see the PDF "Electronic Filing of Financial">PDF "Electronic Filing of Financial Statements - Technical Note' document.

1.6.1. How do I know which taxonomy I should use?

The table in section 1.6 lists the available taxonomies and the accounting periods for which they are relevant. Where available, filers should use the taxonomy aligned to the accounting framework under which the Financial Statements have been produced.

For example, where a company's Financial Statements for the year ended 31 December 2018 have been prepared in accordance with FRS 102, then the FRS 102 + DPL taxonomy should be used. The same company's 2019 Financial Statements should be tagged using the FRS 102 Irish Extension, which takes account of changes to the FRS 102 accounting standard resulting from the Financial Reporting Council's triennial review of FRS 102, effective for years commencing on or after 1 January 2019 (it should be noted that early adoption of these amendments is permitted).

Revenue may restrict the use of older taxonomies to ensure they are not used to tag Financial Statements that have been prepared under a newer accounting framework. For example, with effect from 1 August 2018, use of the IE GAAP and IE IFRS taxonomies is restricted to accounting periods ended on or before 31 December 2014. Filers cannot use the IE GAAP or IE IFRS taxonomies for any iXBRL submissions where the accounting period ends on or after 1 January 2015.

For further details on how this restriction affects Section 110 companies, please see <u>Part</u> 3.1.5.

1.7. iXBRL software packages and tagging services

Generally, CT filers will require software to produce the Financial Statements in iXBRL format. It is not planned to develop a ROS solution for compiling the iXBRL files through input screens. However, a ROS development has been implemented to accept iXBRL files that have been created using externally sourced software.

If filers currently use a UK iXBRL software package and would like to use it to create iXBRL Financial Statements for submission to Revenue, they should check with their software vendor as to whether this is possible. However, filers should be aware that the UK iXBRL software package must be capable to use the accepted taxonomies set out in Part 1.6 above for this to be possible.

It should be noted that Revenue will not provide a list of tagging products or services, nor are there any plans to provide a tagging facility for small entities.

1.8. Keep up to date

The iXBRL hub on the Revenue Website

For further information on non-routine iXBRL matters, please email

ixbrl@revenue.ie

1.9. Technical information

See the <u>Electronic Filing of Financial Statements (iXBRL) - Error Messages Guide</u> for further information on error notifications received and suggested remedies.

See the <u>Electronic Filing of Financial Statements (iXBRL) - Technical Note</u> for general technical information including:

- what taxonomies and entity identifier schemes Revenue accepts;
- what validation rules apply.

The <u>Electronic Filing of Financial Statements (iXBRL) - Style Guide</u> outlines the rules. It also provides guidance to software developers and those using iXBRL conversion tools.

Details on the ROS Public Interface Test (PIT) can be found in <u>Electronic Filing of Financial</u> <u>Statements (iXBRL) - Public Interface Test (PIT)</u>.

2. Electronic filing

One of Revenue's key priorities in our Statement of Strategy is to establish the use of electronic channels as the primary way of conducting business with Revenue.

2.1. iXBRL – Mandatory Electronic filing of the Financial Statements

Since 2013, Revenue has implemented a phased introduction of the requirement to file electronic Financial Statements as part of the Form CT1. There will be a gradual transition until eventually all CT Payers will submit their Financial Statements in iXBRL format.

The table below sets out who is required to file iXBRL Financial Statements and when:

Commencement Date	iXBRL Filing		
23 November 2012	Voluntary for all CT Payers		
1 January 2013	Voluntary for all Income Tax-Payers		
1 October 2013 1 May 2014	Phase I Mandatory for customers of LCD filing CT returns (except Section 110 Securitisation Special Purpose Vehicles) (i) on or after 1 October 2013 (ii) with respect to accounting periods ending on or after 31 December 2012 Mandatory for customers of LCD - Section 110 Securitisation Special Purpose Vehicles filing CT returns (i) on or after 1 May 2014 (ii) with respect to accounting periods ending on or		
1 October 2014	after 31 July 2013 Phase II Except those meeting iXBRL deferral criteria*, mandatory for all Revenue customers filing CT returns (i) on or after 1 October 2014 (ii) with respect to accounting periods ending on or after 31 December 2013		
Later phases to be confirmed	Mandatory for all CT Payers not covered by Phases I & II. The mandate may be extended in the future to some Income Tax filers.		

^{*}iXBRL deferral criteria

To be excluded from the Phase II filing obligation, a company must meet all three of the following criteria:

1. The Statement of Financial Position/Balance Sheet total² of the company does not exceed €4.4 million; and

- 2. The amount of the turnover of the company does not exceed €8.8 million; and
- 3. The average number of persons employed by the company, <u>calculated in</u> accordance with s.317 of the Companies Act 2014, does not exceed 50.

Companies that meet the iXBRL deferral criteria for Phase II should select Option 3 on the Form CT1; see Part 3 for further information.

It should be noted that it is not appropriate to 'pro-rate' the iXBRL deferral criteria where a business has a long accounting period as turnover / revenue may not accrue evenly over the course of the accounting period, the balance sheet total at a particular CT period end could not be known and the calculation of the average number of employees would be calculated over the whole of the long accounting period. Companies not yet subject to mandatory iXBRL filing, as well as Income Tax filers, may still file electronically on a voluntary basis.

2.1.1. Revenue's current administrative practice regarding iXBRL filing deadlines

Revenue's current administrative practice regarding iXBRL filing deadlines allows for the filing of Financial Statements in iXBRL format either:

- before the filing of the Form CT1;
- at the same time as the filing of the Form CT1; OR
- within 3 months after the due date for filing the Form CT1³.

Should a company choose to file its iXBRL Financial Statements within 3 months after the due date for filing the Form CT1, it is important to note that the Form CT1/CT Return is deemed to be incomplete where the iXBRL Financial Statements have not been filed during this 3-month period. This can affect refunds/repayments and can lead to refusal of applications for tax clearance. Therefore, companies should ensure to file their iXBRL Financial Statements on or before the due date of the Form CT1 if they wish to ensure that they are not affected by these issues.

This 3-month administrative practice was introduced from 18 July 2016 and applies for accounting periods ending on or after 1 December 2015. It will continue to apply to subsequent accounting periods until such time as Revenue changes the practice. The practice is subject to review on an ongoing basis and may be withdrawn at Revenue's discretion. Should Revenue decide to change this practice, an eBrief will issue in advance of the change, affording reasonable time to stakeholders to update their practices.

² A query arose in relation to the meaning of **Statement of Financial Position/Balance Sheet Total** relevant to the criteria related to the introduction of Phase II in 2015. In summary, the definition of Statement of Financial Position/Balance Sheet Total is "the aggregate of assets without deduction of liabilities" in respect of all iXBRL submissions made since 1 November 2015. Prior to that, filers had been able to measure the balance sheet total based on "total net assets".

³ Section 959A defines "specified return date for the chargeable period" as no later than the 21st day of the 9th month or 23rd day of the 9th month, where return is filed electronically (ROS) following the end of the accounting period.

2.1.2. Effect of Revenue's current administrative practice regarding iXBRL filing deadlines on the CT acknowledgement letter

The de-coupling of the submission of the Financial Statements from the Form CT1/Form 11 will not delay the issue of the CT acknowledgement letter and the CT1/Form 11 must still be submitted within the prescribed timelines. Please note that where a customer has indicated that they intend to submit Financial Statements in iXBRL format but has not yet done so, the receipt of a CT acknowledgement letter does not constitute confirmation that filing obligations have been satisfied.

Since the CT filing obligation has not been satisfied, no refunds/tax clearance will issue until the iXBRL Financial Statements are filed, even during the 3-month period following the due date of the Form CT1.

3. What Financial Statements must be filed?

The Form CT1 for accounting periods ending in 2013 or earlier contains a single tick box to indicate if an iXBRL file is being submitted by the filer.

When a Taxpayer is completing a Form CT1 for accounts periods ending in 2014 or later they will be faced with several questions to determine whether they must complete the "Extracts from Accounts" section in the Form CT1 or whether they must file iXBRL Financial Statements.

- Option 1) I am not mandated to file Financial Statements in iXBRL format, but I elect to do so.
- Option 2) My tax affairs are dealt with by Revenue's Large Cases Division or I am not excluded from filing Financial Statements in iXBRL format under options 3, 4 or 5 below.
- Option 3) My tax affairs are not dealt with in Revenue's Large Cases Division and I am not mandated under phase 2 to file Financial Statements in iXBRL format because each of the following three criteria apply to me and I am claiming an exclusion:
 - 1. The balance sheet total (aggregate of assets without deduction of liabilities) of the company does not exceed €4.4 million; and
 - The amount of the turnover of the company does not exceed €8.8million;
 - 3. The average number of persons employed by the company does not exceed 50.
- Option 4) The company is inactive and there is no income or expenses on the Profit and Loss account and there is a balance sheet movement of less than €500.
- Option 5) The company is in liquidation (not a voluntary liquidation where there are net assets for liquidation).

Taxpayers who fall into option 1 or option 2 must file iXBRL accounts. Taxpayers that neither opt, nor are obliged, to file Financial Statements in iXBRL format must complete the "Extracts from Accounts" on the Form CT1 in full.

It is important to note that abridged Financial Statements, which companies may prepare under company law, will not constitute a valid submission for Revenue purposes.

It is **not** acceptable to have the Financial Statements partially reported in iXBRL and partly entered on the Form CT1. The iXBRL return must, at minimum, include the full Financial Statements including the DPL account. Therefore, where a Taxpayer has indicated that they are submitting iXBRL Financial Statements, then the "Extracts from Accounts" section of the Form CT1 is not available to that Taxpayer to complete.

3.1. What items should be included in the iXBRL file to be submitted to Revenue?

On 30th September 2014, Revenue clarified that the DPL account (refer to **paragraph 3.1.2** for more details) must be included in the iXBRL file submitted. Around the same time an email was sent to all potential Phase II iXBRL Filers providing the same notification on an individual basis. The 2014 and later versions of the Form CT1 also set out the content required in the iXBRL returns to include the DPL account. This means that every CT filer has been notified of Revenue's requirements. Revenue does not require re-submission of returns submitted prior to the introduction of the DPL requirement.

Revenue has mandated the full tagging of Financial Statements. This includes the Directors' Report, Auditor's Report, Statement of Profit or Loss and Other Comprehensive Income, Statement of Financial Position (Balance Sheet), Statement of Cash Flows, Statement of Changes in Equity, Notes to the Accounts and a DPL account (please note this list is not exhaustive). Detailed Pension Notes and Detailed Financial Instrument Notes do not have to be tagged.

With the exception of the aforementioned Pension and Financial Instrument Notes, all data items presented must be tagged, including comparators (previous accounting period figures). If a data item appears more than once then it must be tagged each time. In circumstances where a financial report data item or concept does not have a relevant taxonomy tag, the data concerned should simply be left as plain text.

Completion of the "Extracts from Accounts" section of the Form CT1 is not mandatory where the Financial Statements are submitted and fully tagged in iXBRL. There should be no loss of detail in the iXBRL Financial Statements in respect of items which previously would have been declared in the Form CT1.

Generally, vendors of accounting software are now including iXBRL tagging functionality in their products allowing the iXBRL version of a set of Financial Statements to be generated automatically. What this means in practice is that the move to iXBRL is relatively seamless for Taxpayers and agents using standard accounting packages.

The following guide will assist in determining the minimum content and tagging in iXBRL returns required by Revenue:

Form CT1 Filer- Company Category	Auditor's Report	Directors' Report	Detailed Profit or Loss	Balance Sheet	Disclosure Notes
Preparation and publication of financial statements required under (ROI) Companies Act (CA) – subject to CA statutory audit	Yes	Yes	Yes	Yes	Yes
Preparation and publication of financial statements required under (ROI) Companies Act (CA) – not subject to CA statutory audit		Yes	Yes	Yes	Yes
Preparation and publication of financial statements required under (ROI) legislation other than the Companies Act (e.g. Industrial and Provident Societies Acts 1893-2014)	Yes – if applicable	Yes – if applicable	Yes	Yes	Yes – if applicable
Tax Resident in ROI – not required to prepare and publish Financial Statements under legislation in country of incorporation or in ROI.		Ż×,	Yes	Yes	
Tax Resident in ROI – Preparation and publication of Financial Statements required under legislation in another jurisdiction (e.g. UK incorporated entity bound by the UK Companies Act)	Yes – if applicable	Yes – if applicable	Yes	Yes	Yes – if applicable
Not Tax Resident in ROI – Operating a Branch or Agency in ROI		8	Yes	Yes – if applicable	
Group Holding Company (Consolidated Financial Statements prepared and published)			Yes	Yes	

3.1.1. Statement of Cash Flows

It is understood that, under Company Law, the following entities are exempt from preparing a Statement of Cash Flows:

- Companies incorporated under the Companies Act and entitled to the
 exemptions available in the legislation for small companies when filing
 Financial Statements with the Companies Registration Office (CRO). Note that
 small companies in this context means a company that meets two of the
 following three criteria:
 - The amount of turnover of the company does not exceed €12 million;
 - 2. The balance sheet total of the company does not exceed €6 million;
 - 3. The average number of employees, <u>calculated in accordance with s.317 of</u> the Companies Act 2014, does not exceed 50.
- Mutual life assurance companies;
- Retirement benefit plans;
- Investment funds that meet all the following conditions:
 - (i) substantially all the entity's investments are highly liquid;
 - (ii) substantially all the entity's investments are carried at market value; and
 - (iii) the entity provides a statement of changes in net assets

Such entities will not be required to include a Statement of Cash Flows in their iXBRL Financial Statements.

3.1.2. Detailed Profit or Loss account

Prior to the introduction of the "Extracts from Accounts" in the Form CT1, CT Payers generally provided Revenue with a paper DPL. It should be noted that where the Financial Statements of a company are submitted in iXBRL format, the "Extracts from Accounts" section of the Form CT1 return is not available for completion. Instead, a DPL account is required. This is on the basis that the format of the Statement of Profit or Loss, as required by the Companies Act, does not provide the level of detail required in the prescribed Form CT1. Therefore, the DPL is required in the iXBRL file.

Generally, the DPL will contain greater detail than the limited "Extracts from Accounts" section of the Form CT1. It is expected that businesses will have this greater level of detail in order to compute the net profit/loss figure in the Financial Statements. Even if the business is not required to produce Financial Statements, it is expected that this level of detail will be available to complete the CT return. In keeping with Revenue's requirement for full tagging of the Financial Statements, all the line items in the DPL should be tagged, including the prior year comparators.

All iXBRL filers are required to submit a fully tagged DPL (including prior year comparators) in all iXBRL submissions from 1 December 2015.

Revenue requires that a business fully breaks down its DPL income and expenditure items and uses all relevant DPL tags in the accepted taxonomies. By way of illustration, in the context of the formats of the Statement of Profit or Loss required under the Companies Act, the DPL should, at minimum, provide the following additional detail:

- Income should, where applicable, be broken down into Sales/Receipts/Turnover; Receipts from Government Agencies – GMS etc.; Other Income.
- Expenditure should, where applicable, provide Cost of Sales details and line item details for Administrative, Distribution and any other relevant costs.

3.1.3. Mandatory items in iXBRL submissions

For iXBRL submissions using the IE GAAP or IE IFRS taxonomies, only Profit or Loss Before Tax is mandatory.

However, on the basis that there should be no loss of data between those CT filers who complete the Form CT1 "Extracts from Accounts" and those who file iXBRL Financial Statements, all other taxonomies contain mandatory items equivalent to the mandatory items on the CT1 "Extracts from Accounts":

CT1 Mandatory Item	iXBRL Mandatory Item	Taxonomy
Sales / Receipts / Turnover	DPLTurnoverRevenue	DPL
Receipts from Government Agencies - GMS,		
etc.	DPLGovernmentGrantIncome	DPL
Other Income	DPLOtherOperatingIncome	DPL
Gross Trading Profits	DPLGrossProfitLoss	DPL
Salaries / Wages, Staff Costs	DPLStaffCostsEmployeeBenefitsExpense	DPL
Sub-contractors	DPLSubcontractorCosts	DPL
Profit (loss) on ordinary activities before		
taxation	DPLProfitLossBeforeTax	DPL
Shareholder's Funds	Equity	FRS/IFRS

Figure 3: Extracts from Accounts

If a company has no values for any of these items, then a zero value must be reported.

Please note that the mandatory iXBRL items which are required in the DPL are in no way intended to constitute a 'pro-forma' DPL or minimum tagging list. Please see Part 3.1.2 above for further information on the DPL format or layout required by Revenue.

The iXBRL mandatory items mirror the 'required fields' on the CT1 'Extracts from Accounts', and as with the 'Extracts from Accounts', they should reflect what is in the Financial Statements. The iXBRL mandatory items are intended for transcription, not recalculation or

reclassification. Please see the table below for some general and specific guidance on how to use the iXBRL mandatory items.

iXBRL mandatory item	Guidance
DPLTurnoverRevenue	Companies should record the amount that they would normally term to be their "turnover" in their financial statements. Insurance/Reinsurance/Life assurance companies: turnover is "earned premiums net of reinsurance" plus "net investment income". Ignore claims, administration expenses and acquisition expenses. Special Purpose Vehicles (SPVs) and leasing companies: turnover is gross income. Follow the accounts not the tax computation.
DPLGovernmentGrantIncome	This includes income from government departments, such as GMS payments, Free Legal Aid, Department of Agriculture payments etc. This is to facilitate filers who identify such income separately or whose income is solely derived from a government source.
DPLOtherOperatingIncome	Do not enter income taxable under a separate heading such as investment income, rent, forex gains or losses, dividends or interest. The term Other Operating Income is used to facilitate filers who may not be happy to describe their main income as "Sales, receipts or turnover" or as GMS income.
DPLGrossProfitLoss	Companies should record the amount that they would normally term to be their "gross profit". Insurance/Reinsurance/Life assurance companies: gross profit is "earned premiums net of reinsurance" minus "claims incurred net of reinsurance" plus "net investment income".
DPLStaffCostsEmployeeBenefitsExpense	This is the deduction for staff remuneration in the accounts, excluding remuneration paid to directors.
DPLSubcontractorCosts	This is the amount paid out to subcontractors during the accounting period.
DPLProfitLossBeforeTax	This is the profit or loss per the financial statements before the charge to tax.
Equity	This is the residual interest in the assets of the entity after deducting all its liabilities and is equivalent to Shareholder's Funds under Irish GAAP before the introduction of FRS 101/102.

3.1.4. Submission of draft Financial Statements in iXBRL format

In certain limited circumstances Revenue recognises that it may be necessary to file draft/provisional Financial Statements. Revenue is prepared to accept that if the filer is satisfied that the **only** issue pending is that the Financial Statements have not been signed-off by the director(s), then it is in order to file the draft/provisional Financial Statements without prior permission from Revenue. In these circumstances, there is no need to resubmit the iXBRL Financial Statements, when they are signed-off later [unless the draft statements are different to the final ones submitted].

However, where there are any other issues giving rise to the draft/provisional Financial Statements, filers are required to contact the Revenue Branch which handles their affairs [using Revenue's secure MyEnquiries facility; select the "Corporation Tax" and "iXBRL" dropdown categories], outlining the reason(s) for the draft Financial Statements and requesting permission to submit draft Financial Statements in that situation. If this is agreed with the Revenue Branch, then the final signed-off set of Financial Statements must also be submitted in iXBRL format.

If the Revenue Branch does not agree to allow the submission of the draft Financial Statements, then the obligation to file iXBRL Financial Statements remains and the company is required to file either the signed Financial Statements or draft Financial Statements, where they are satisfied that the only issue pending is that the Financial Statements have not been signed off by the director(s). Failure to do so before the due date for filing the iXBRL Financial Statements results in the Form CT1/CT Return being deemed late, which may give rise to a surcharge and/or restriction of loss relief.

3.1.5. Section 110 companies and iXBRL

Section 110 companies are obliged to file iXBRL Financial Statements in respect of CT returns made on or after 1 May 2014 and with respect to accounting periods ending on or after 31 July 2013.

Where a Section 110 company has elected to file its CT returns on the basis of single entity IFRS Financial Statements or modified Irish GAAP, it is required to file these Financial Statements in an iXBRL format.

Where a Section 110 company has not elected to file its CT returns on the basis of single entity IFRS Financial Statements or modified Irish GAAP, and instead decides to file its CT return on the basis of single entity accounts prepared under Irish GAAP as applied at December 2004 (i.e. Old Irish GAAP), that Section 110 company should file an iXBRL version of the single entity Old Irish GAAP management accounts upon which it bases its return. These single entity Old Irish GAAP management accounts should, at a minimum, include a DPL account and Statement of Financial Position / Balance Sheet. In addition, the Auditor's Report and the Directors' Report that are included in the signed Financial Statements should be submitted (this information would not be prepared as part of the Irish GAAP as at 31 December 2004 management accounts).

Restriction of the IE GAAP and IE IFRS taxonomies and Section 110 companies

Revenue is aware that Section 110 companies who prepare their CT returns on the basis of single entity accounts prepared under 'Old Irish GAAP' have usually used the IE GAAP taxonomy to tag their accounts.

On the basis that, from 1 August 2018, the use of the IE GAAP and IE IFRS taxonomies has been restricted to accounting periods ended on or before 31 December 2014, Section 110 companies are obliged to use the later FRS/IFRS taxonomies for their iXBRL submissions in respect of accounting periods ending on or after 1 January 2015.

It should be noted that the use of later FRS or IFRS taxonomies by a Section 110 company in no way constitutes an election to file its CT returns on the basis of single entity IFRS Financial Statements or modified Irish GAAP. Revenue considers that the taxonomy used to tag the accounts is not relevant to such an election.

3.1.6. Groups of companies and iXBRL

Consolidated Financial Statements are prepared for an accounting period to represent the activity of a group of companies. Such consolidated Financial Statements will include the Directors' Report, Auditor's Report and Opinion, Statement of Profit or Loss and Other Comprehensive Income, Statement of Financial Position (Balance Sheet) and Notes to the accounts. However, companies within such a group, including the group holding company, are usually individually registered for CT and are required file a tax return to Revenue based on financial information prepared and made out in respect of that company's individual activity.

Many companies avail of the exemption under the Companies Act 2014 whereby separate holding company individual Financial Statements need not be submitted to the CRO. In such circumstances, the holding company Financial Statements are stated as a consolidation of the group accounts. A holding company individual Statement of Financial Position / Balance Sheet and the related holding company individual Statement of Financial Position / Balance Sheet disclosure notes are included in such consolidated Financial Statements. There is generally no separate Statement of Profit or Loss account for the holding company or disclosure notes. Only consolidated Statement of Profit or Loss and consolidated Statement of Profit or Loss disclosure notes need be included.

Revenue requires individual sets of Financial Statements to be submitted in iXBRL format in respect of each company within a group. However, holding companies may submit consolidated Financial Statements to Revenue, provided the following are included:

- A holding company individual Statement of Financial Position / Balance Sheet and the related holding company individual Statement of Financial Position / Balance Sheet disclosure notes; and
- Separate DPL account for the holding company containing, at a minimum, such level of information as would allow the chargeable profits of the entity to be assessed.

This individual holding company DPL account should be tagged and appended to the consolidated Financial Statements such that one document in iXBRL format can be submitted. In addition, Revenue expects the holding company individual Statement of Financial Position / Balance Sheet to be tagged. Notes to Accounts, Directors' and Auditor's Reports should include such tagged disclosures which are relevant to the holding company.

3.1.7. Branches, Agencies and iXBRL

Section 884 of the TCA extends the definition of a return in respect of a company trading through a Branch or Agency to produce financial information containing sufficient information to enable the chargeable profits of that Branch or Agency to be determined. Section 76A TCA 1997 requires such financial information to conform to generally accepted accounting practice. In practice Revenue will require an iXBRL DPL account and a Statement of Financial Position / Balance Sheet (to the extent that one is prepared) in respect of the Branch or Agency. In determining if the Branch meets the iXBRL deferral criteria from Phase II of mandatory iXBRL filing, it is sufficient to look at the information referable to the Branch itself rather than the company.

4. The iXBRL submission process

ROS includes screens allowing Taxpayers or agents to submit their Financial Statements in iXBRL. This will be accessible at any time via the "My Services" or "Agent Services" screens in ROS and will also be available during the CT1 filing process.

Financial Statements may be uploaded before, after, or alongside a CT1.

4.1. ROS: The iXBRL submission process

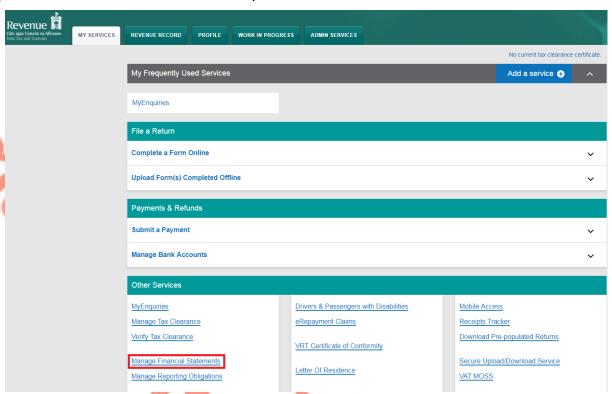


Figure 4 - My Services screen 1

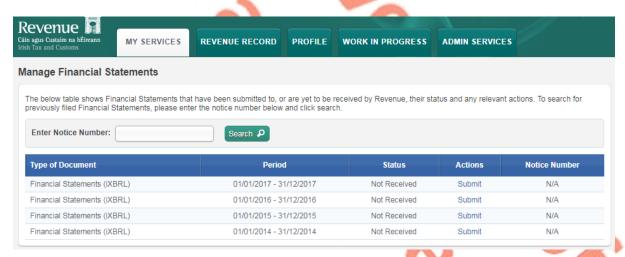


Figure 5 - My Services screen 2

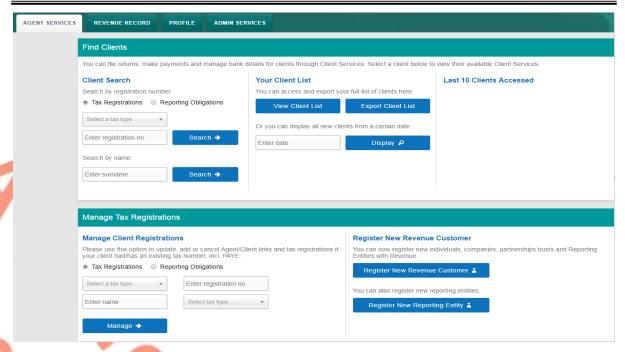


Figure 6 - Agent Services screen 1

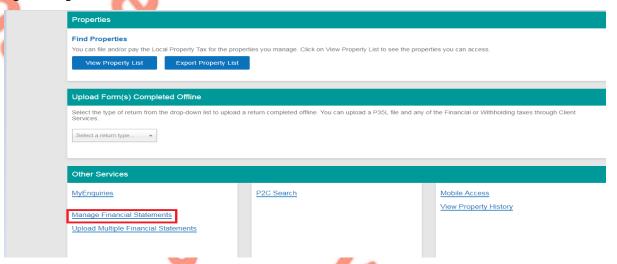


Figure 7 - Agent Services screen 2

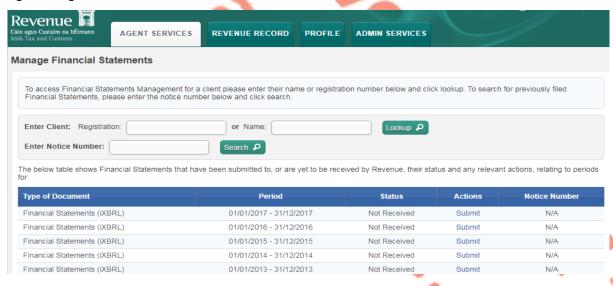


Figure 8 - Agent Services screen 3

4.1.1. Testing iXBRL files

Revenue's File Format Test Facility is available to allow customers to ensure that their iXBRL files are working satisfactorily in advance of submission. This can be accessed at:

https://softwaretest.ros.ie/rcw/xbrl/fftest/startUpload

Features of the File Format Test Facility:

- File size limit of 1MB
- Due to licensing restrictions on 3rd party products, the Revenue Business Rules, which are executed using XBRL Formula language, will not take place for test documents submitted via Revenue's File Format Test Facility (see Part 2.5 of the iXBRL Error Messages document for further information).

If a company wishes to test a file exceeding 1MB in size, or test it against the Revenue Business Rules, it is recommended that they upload the file using their ROS digital certificate or ask their agent to upload it using their ROS digital certificate.

If the file contains any errors, a report will be generated, and the upload will not be recorded as the submission of a return as the file will not be accepted by ROS. If the file does not contain any errors, then the upload will be recorded as a submission of a return and there will be no requirement for testing.

If filers are concerned that the iXBRL Financial Statements that they wish to test are incomplete or not yet ready for submission through ROS, they should ensure that the document contains an error so that it is not accepted by ROS as the submission of a return. For example, the Companies Registration Office (CRO) number or CT registration number in the document could be changed so that it does not match that of the company (e.g. to 0). If this is done, the document will not pass validation and filers will receive a message stating that the CRO number or tax number does not match Revenue records, in addition to messages concerning any other errors that may be in the document.

Developers who wish to conduct testing of iXBRL files may apply for a PIT Digital Certificate. Further information on how to do this is set out in Part 5.1 of the <u>iXBRL Public Interface Test</u> (PIT) document.

4.1.2. How will filers know that an iXBRL filing has been accepted by Revenue?

A message confirming a successful filing will be returned. If a filing is unsuccessful, an error message will be displayed to indicate the nature of the problem. The <u>iXBRL Error Messages</u> document contains a list of possible errors and the course of action to be taken when iXBRL filers receive error notifications.

As set out in <u>Part 7.4</u> of this document, Revenue <u>staff</u> are not expected to deal with specific tagging issues of iXBRL files, and filers should contact their software vendor in the first instance if they are unable to fix the errors in the document. Software vendors who have problems with validating iXBRL files that they are unable to resolve elsewhere can contact iXBRL@revenue.ie.

4.1.3. Amending iXBRL Financial Statements

Where amendments to iXBRL Financial Statements are required (e.g. a tagging error exists), it is possible to submit an amended or corrected version.

Where the adjustments to the Financial Statements do not also impact the information submitted in the CT1/Form 11, there is no requirement to re-submit the CT1 or Form 11.

4.2. Integrity checks

Revenue carries out the following 'real-time' integrity checks on all original or amended Forms CT1 submitted for account periods ending in 2014 or later:

- Turnover: A check is carried out at the time of filing the Form CT1 to determine whether the turnover declared in CT1 "Extracts from Accounts" of the company exceeds €8.8 million. If the turnover exceeds this turnover limit it will not be possible to proceed without selecting the iXBRL option on the Form CT1.
- 2. Statement of Financial Position / Balance Sheet total (aggregate of assets without deduction of liabilities): A check is carried out, at the time of filing the Form CT1, on shareholder funds in the CT1 "Extracts from Accounts". If this total exceeds €4.4 million it will not be possible to proceed without selecting the iXBRL option on the Form CT1. Not all cases where the Statement of Financial Position / Balance Sheet total exceeds €4.4 million will be picked up by this check. Ultimately, it is the company's responsibility to determine whether they are obliged to file iXBRL Financial Statements.

Revenue also carries out integrity checks following the submission of the Form CT1 as follows:

3. **Check if LCD Case**: When the Form CT1 is accepted by Revenue a subsequent check is carried out to determine if the case is dealt with in LCD. Where this check indicates that the case is an LCD case, the obligation to file iXBRL Financial Statements remains and this may affect any tax refunds, tax clearance, liability to surcharges etc.

It should be noted that LCD companies who have selected Options 4 or 5 on the Form CT1 stating that they are inactive or in liquidation (not a voluntary liquidation where there are net assets for distribution) will not be subject to this check. For iXBRL purposes, inactive companies are those companies with no income or expenses in the Statement of Profit or Loss and a Statement of Financial Position / Balance Sheet movement of less than €500.

4.2.1. Integrity checks that no longer operate

Selecting Number of Employees: When the Form CT1 was accepted by ROS, Revenue formerly carried out a subsequent check on the number of employees included in the most recently filed Form P35L. Where this check indicated that the number of employees was greater than 50, the obligation to file iXBRL Financial Statements remained.

This check was turned off from 1 August 2018 as Revenue now accepts the method of calculating the average number of employees as set out in Section 317 of the Companies Act 2014; that is, the number of persons employed by a company in each month of the financial year, aggregated and then divided by the number of months in the financial year of the company.

It should be noted that any companies still being affected by this check should use MyEnquiries (select the "Corporation Tax" and "iXBRL" drop-down categories) to request that the iXBRL Financial Statements are marked as not required where the average number of employees in the statutory Financial Statements does not exceed 50.

Companies should note that their Revenue office may require a copy of the statutory Financial Statements in a non-iXBRL format such as Word or pdf as evidence that the average number of employees declared in the statutory Financial Statements does not exceed 50.

Should the average number of employees in the statutory Financial Statements exceed 50, the obligation to file iXBRL Financial Statements will remain.

The only circumstance under which it will be necessary to contact Revenue in respect of the average number of employees is when the turnover does not exceed €8.8 million and the Statement of Financial Position / Balance Sheet total does not exceed €4.4 million.

4.3. Validation checks

Uploaded iXBRL Financial Statements are subject to validation checks. The status of iXBRL files uploaded in ROS are viewable in an 'iXBRL Results Screen'. The results of the checks will automatically be displayed when available. If any submissions fail this process, a notification will be sent to the customer's ROS inbox informing them of the errors.

Taxpayers will then have the option to amend and re-submit their accounts.

Further details on the types of validation checks carried out can be found in the iXBRL Technical Document "Error Messages".

4.4. Uploading multiple Financial Statements

Changes have been made to ROS to enable Agents to upload multiple Financial Statements in iXBRL format simultaneously. The "Manage Financial Statements" section on the Agent Services page has two options; "Manage Financial Statements" and "Upload Multiple Files". The "Manage Financial Statements" option facilitates uploading of a single iXBRL file. The "Upload Multiple Files" option enables the Agent to upload multiple iXBRL files.

It should be noted that multiple iXBRL files can be uploaded and multiple Forms CT1 can be uploaded, but it is not possible to upload both iXBRL and Form CT1 files within the same upload session.

4.5. iXBRL Financial Statements stuck in "Processing"

If filers have attempted to upload iXBRL Financial Statements and the file displays as "Processing" for a number of hours or more, they should contact the ROS Helpdesk (ROSOnLineHelp@revenue.ie) to request that the file is released from "Processing" before re-submitting it.

If the due date for filing the iXBRL Financial Statements should pass while filers are awaiting the release of the file, they should also use <u>MyEnquiries</u> (select the "Corporation Tax" and "iXBRL" drop-down categories) to contact the Revenue Branch which handles their affairs if they intend to:

(A) Request that any surcharge that arises as a result of this issue is waived; OR

(B) Proceed with a claim for Group Relief

Filers should state whether they are requesting the waiver of a surcharge and/or that they intend to proceed with a claim for Group Relief in their message, and it should be accompanied by:

- A screen-grab showing that the iXBRL Financial Statements are stuck at "Processing";
 and
- A copy of the email sent to the ROS Helpdesk requesting that the iXBRL file be released; and
- A copy of the iXBRL file that was being uploaded.

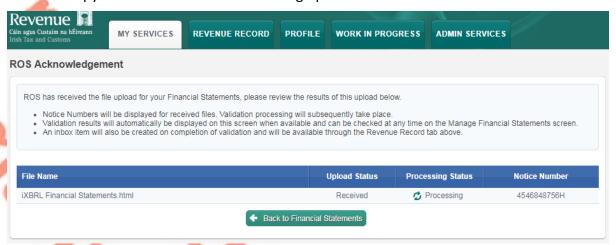


Figure 9 - The image above illustrates how the screen-grab should appear

On condition that filers re-submit the iXBRL Financial Statements in a timely manner following their release by the ROS Helpdesk, the Branch will waive any surcharge arising as a result of this issue, nor will a Group Relief claim be restricted.

5. iXBRL and sole traders

It is recognised that, in addition to maintaining books and records, a sole trader may prepare a Statement of Profit or Loss in order to complete a tax return.

While there is no general statutory obligation for sole traders to prepare Financial Statements on the basis of a recognised accounting standard, Revenue recognises that sole traders may wish to file Financial Statements in iXBRL format. To facilitate this body of Taxpayers and their agents, those filing Income Tax returns have been able to submit their Financial Statements in iXBRL format via ROS since 1 January 2013.

Taxpayers choosing this option may omit the accounts menu data currently required as part of their return, where all the information required at present in the "Extracts from Accounts" menu is included and fully tagged in the iXBRL Financial Statements filed.

In the event that the Form 11 box is ticked in error and there is no iXBRL filing of Financial Statements, then the customer is required to fill in the "Extracts from Accounts" section on the Form 11.

6. Compliance issues

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]

6.1. Changes to accounting periods

As set out in Part 1.1, iXBRL Financial Statements are encompassed within the definition of a CT return. Accordingly, ROS periods for the filing of iXBRL Financial Statements are aligned to the corresponding CT periods.

For example, if a company has a 12-month accounting period ending on 31 December, it will have a CT (ROS CT1) period of 1 January to 31 December, with dual requirements to file both the Form CT1 and the iXBRL Financial Statements for the period. If the periods in the iXBRL Financial Statements do not match up when the file is uploaded in ROS (subject to small tolerances to allow for weekends etc.), the file will be rejected and an error message will be generated. Please see errors 2 & 3 in Table 2.5 of the Error Messages document for specimen error messages.

It is possible to change the Form CT1 period while completing the Form CT1 (please see Part 3.1 of Tax and Duty Manual Part 38-02-01 for further information). Alternatively, requests for changes to accounting periods may be made by contacting the Revenue Branch which deals with the Taxpayer's affairs (preferably through Revenue's MyEnquiries facility, using the "Corporation Tax" and "iXBRL" drop-down categories).

If you have changed the ROS period for the Form CT1, the corresponding iXBRL period will also change to the new period, although it may take a couple of days for the changes to be visible in ROS.

6.1.2 iXBRL filing where a company has a long or short accounting period

Where a company has a long accounting period, Revenue will accept that the iXBRL Financial Statements for that long accounting period will be filed together with the latest Form CT1 due for the long accounting period.

For example, if a company has an 18-month accounting period running from 1 January 2017 to 30 June 2018, it will have two ROS CT1 periods for 1 January 2017 to 31 December 2017 and 1 January 2018 to 30 June 2018. The iXBRL Financial Statements for the whole of the long accounting period are required to be filed against the second ROS CT1 period of 1 January 2018 to 30 June 2018.

In these circumstances, the obligation to file iXBRL Financial Statements for the earlier ROS CT1 period remains, which may affect a company's application for refunds, repayments and tax clearance. Therefore, filers will need to notify the Revenue Branch which handles their affairs (preferably through Revenue's MyEnquiries facility, using the "Corporation Tax" and "iXBRL" drop-down categories) where there are multiple Forms CT1 being filed in respect of

a long accounting period so that the requirement to file iXBRL Financial Statements can be switched off for the earlier ROS CT1 period(s).

Where a company has a short accounting period of less than 1 year in duration, it will be obliged to file iXBRL Financial Statements that cover the short accounting period.

Note: Where a ROS accounting period is adjusted after filing iXBRL Financial Statements, the iXBRL filing(s) previously submitted in respect of such period(s) will no longer be valid and consequently iXBRL Financial Statements must be re-submitted for the adjusted period(s).

6.2. Surcharge - s.1084 TCA

Section 1084(1)(b)(i)(I) provides that if a person has carelessly or deliberately filed an incorrect return, and they do not remedy it without unreasonable delay, then they will be deemed not to have filed a tax return by the due date.

Section 1084(1)(b)(ia) provides that if a return which should have been delivered electronically is delivered in another format (e.g. paper), then it is an incorrect return.

Section 1084(2) then imposes a late filing surcharge on such returns.

Therefore, if a Taxpayer has carelessly or deliberately failed to file their Financial Statements electronically, then a late filing surcharge is applicable.

This link bring you to the Tax and Duty Manual "Surcharge for late submission of Returns".

6.3. Corporation Tax – late returns - s.1085 TCA

Failure to submit the iXBRL accounts as part of the return also results in an incorrect return for the purposes of **section 1085**. This impacts upon the availability of certain reliefs such as loss relief or group relief.

6.4. Repayments of tax - s.865 TCA

A right to a repayment of tax only arises where a valid claim has been made. In the context of CT repayments, officers should not generally consider that a valid claim has been made until any iXBRL Financial Statements have been filed. Accordingly, in the absence of iXBRL Financial Statements no repayments of CT will generally be made.

The restrictions set out in 6.1, 6.2 and 6.3 above will apply in the same way as currently applies to the Form CT1. Branches will continue to have the right to remove loss restrictions or surcharges as currently applies with the Form CT1.

Information on loss restrictions can be found in the <u>Notes for Guidance</u> on Part 12 of the TCA.

Information on surcharges can be found in Tax and Duty Manual Part 47-06-01.

Branches will need to manually apply loss restrictions and/or late filing surcharges for accounts periods ending in 2013 or earlier. In these situations, Branches should consider if there are genuine iXBRL filing difficulties that may warrant concessional treatment.

6.5. Penalty for failing to e-file - s. 917EA TCA

Where mandatory filing of the Financial Statements in iXBRL format applies and the 3 months have elapsed without the filing of Financial Statements in iXBRL format, the issue of a €1,520 penalty under **section 917 EA (7)** may apply.

6.6. iXBRL and the Companies Registration Office (CRO)

It is not necessary for companies who are iXBRL filers to make a separate submission of Financial Statements in iXBRL format to the CRO; the obligations and process for filing Financial Statements with the CRO remain unchanged.

7. The role of...

7.1. Revenue Operational Branches

Revenue Operational Branches will deal with iXBRL queries that are customer specific such as:

- Helping customers to decide whether they fall into Phase I, Phase II or Phase III.
- Waiving of obligation to file iXBRL returns in specific circumstances. This
 concerns dropping the obligation to file iXBRL return for a particular period.
 Examples of these are companies in liquidation and inactive companies.
- Difficulties in meeting iXBRL filing deadlines.
- Being familiar with this TDM and the iXBRL webpage; directing customers to the technical documents on the Revenue iXBRL page where, for example, the taxonomies accepted by Revenue are listed.

7.2. iXBRL Helpdesk

The iXBRL Helpdesk (<u>ixbrl@revenue.ie</u>) now deals only with non-routine iXBRL issues. The service is also available to software vendors who have problems with validating iXBRL files that they cannot resolve elsewhere.

7.3. ROS Helpdesk

The ROS Helpdesk will assist customers with routine uploading of iXBRL files and accessibility of ROS services. Any issues relating to use of the ROS iXBRL services should be referred to this Helpdesk ROSOnLineHelp@revenue.ie.

7.4. iXBRL issues which Revenue staff are not expected to handle

Revenue staff are not expected to deal with specific tagging issues of iXBRL files. These are generally accounting and/or software issues which should be handled by Taxpayers, their agents, or software providers. Taxpayers encountering such difficulties should be referred to these agents or software providers instead of the iXBRL Helpdesk.

8. Viewing and working with iXBRL files

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]

Appendix I - Legislative analysis of obligation to provide accounts

Persons who are registered for tax must maintain books and records. This obligation is dealt with in Tax and Duty Manual <u>Part 38-03-17</u>.

Obligation to provide accounts information

A CT Payer must provide the accounts information required by notice or specified in the prescribed form (the Form CT1). The information required is limited to such accounts, documents annexed to accounts, further information, reports or further particulars as required which enable the chargeable profits of a company to be determined. This obligation is provided by **section 884(2) and (2A)**, (Return of profits).

Section 959 I(4), (Obligation to make a return), provides that, under self assessment, notwithstanding that a notice to file a return was not received, a return under section 884 must be delivered by a chargeable person. Section 959K (Requirements for returns for CT purposes) provides that for the purposes of Part 41A (Assessing rules including rules for self assessment) the return required for CT purposes should include any of the information that would be contained in a return delivered pursuant to a notice delivered under section 884. This includes such "information, accounts, statements, reports and further particulars" as are required by the Form CT1.

Appendix II – List of former iXBRL FAQs and where they have been incorporated into this TDM

FAQ No.	Narrative	Incorporated into TDM Part
1	What is iXBRL?	1.4, Para 1
2	What is the difference between iXBRL and XBRL?	1.4, Para 2
3	Does iXBRL cause a change in accounting standards?	1.4, Para 3
4	Do Revenue provide a test facility for iXBRL filers?	4.1.1
5	Why must I submit Financial Statements in iXBRL format?	1.1, Para 1
6	Am I obliged to submit Tax Computations in iXBRL format?	1.4, Para 6
7	Will the de-coupling of the submission of the Financial Statements from the CT1/Form 11 delay the issue of the Notice of Assessment?	2.1.2, Para 1
8	Do I have to make a separate submission of Financial Statements in iXBRL format to the Companies Registration Office (CRO)?	6.6
9	Can I submit Financial Statements in iXBRL format in the Irish language?	1.4, Para 4
10	If I file Financial Statements in iXBRL format during the optional phase, will I be subject to any additional Revenue scrutiny?	Deprecated
11	Does Revenue carry out any iXBRL integrity checking of Forms CT1?	4.2
12	What items should be included in the iXBRL file to be submitted to Revenue?	3.1, Paras 2 <u>& 4</u>
13	Will I meet my obligations if I provide details from the Financial Statements partly through the iXBRL return and partly through the "Extracts from Accounts" section of the Form CT1?	3, Para 5
14	From what date should the tagged iXBRL Detailed Profit & Loss Account (DPL) be filed?	3.1.2, Para 3
15	Why does Revenue require a DPL in the iXBRL file?	3.1.2, Paras 1 & 2
16	The CT1 "Extracts from Accounts" menu requires mandatory fields for Turnover, Gross Profit and Profit (Loss) Before Tax etc. Are there any mandatory fields for iXBRL submissions?	3.1.3
17	How should I use the iXBRL mandatory items?	3.1.3, Para 6
18	What format or layout does Revenue require for the iXBRL DPL?	3.1.2, Paras

		<u>4-6</u>
19	If I file my Financial Statements in iXBRL format, do I still have to complete the CT1 "Extracts from Accounts" menu?	Deprecated
20	Can sole traders submit Financial Statements in iXBRL format?	<u>5, Para 2</u>
21	What is the process for submitting Financial Statements via iXBRL?	4, Paras 1-2
22	How will I know that my iXBRL filing has been accepted by Revenue?	4.1.1
23	If I submit my Financial Statements in iXBRL format, do I still have to file a Corporation Tax return (CT1) or Income Tax return (Form 11)?	Deprecated
24	Is it sufficient to submit my Financial Statements in PDF format?	1.4, Para 5
25	Will there be a penalty for not filing correct iXBRL accounts?	<u>6.2</u>
26	Can I submit revised Financial Statements if an error is identified (perhaps due to a tagging mistake)?	4.1.3, Para 1
27	Is it permissible to submit abridged Financial Statements in iXBRL format?	3, Para 4
28	Where I submit amended Financial Statements, do I also need to re-submit my CT1 or Form 11?	4.1.3, Para 2
29	What should I do if I need to adjust my ROS accounting period and /or my Financial Statements cover more than a single ROS accounting period?	6.1
30	What are tags?	<u>1.5, Para 1</u>
31	What is a taxonomy?	1.6, Para 1
32	What taxonomies will Revenue accept?	1.6, Paras 1, 6 & 7
33	How do I know which taxonomy I should use?	<u>1.6.1</u>
34	What items within the Financial Statements need to be tagged?	3.1, Paras 2 <u>& 3</u>
35	Do I need to tag data which is listed in a Financial Statement but is not reported, such as data represented by a dash or a blank in a table?	1.5, Para 2
36	In my Financial Statements, the narrative of the Directors' Report and the Auditor's Report is unstructured; how should I tag these?	Deprecated
37	If I currently use a UK iXBRL software package, can I use it to make iXBRL filings to Revenue?	1.7, Para 2
38	In the UK, HMRC provide a list of software products and services for tagging purposes. Will Revenue be providing similar lists?	<u>1.7, Para 3</u>

		1
39	In the UK, HMRC provide a tagging facility for small entities, will Revenue provide a similar facility?	1.7, Para 3
40	Do draft/provisional Financial Statements have to be iXBRL tagged?	3.1.4
41	Should S110 companies that elect to re-cast their accounts to a differing accounting standard for a given accounting period submit the revised accounts with their filing?	3.1.5, Paras 2-3
42	I note that Revenue is restricting the use of the IE GAAP and IE IFRS taxonomies to accounting periods ended on or before 31 December 2014. How will this affect Section 110 companies who file their Corporation Tax returns on the basis of single entity accounts prepared under Irish GAAP as applied at December 2004 (i.e. Old Irish GAAP)?	3.1.5, Paras 4-6
43	Under the '94 – Countries and Regions' domain, I cannot find or select 'Jersey' as a dimension for the tag "Country of incorporation" in the IE GAAP or IE IFRS taxonomies; what should I do?	Deprecated
44	Who is required to submit Financial Statements in iXBRL format and when?	2.1
45	What does Revenue mean by "Balance Sheet Total"?	2.1, Footnote
46	Must I file Financial Statements at the same time as my Form CT1 [or Form 11]?	2.1.1
47	If a business has a long accounting period covering more than one CT1 period, is it appropriate to 'pro-rate' the iXBRL deferral criteria when deciding whether the business has an obligation to submit Financial Statements in iXBRL format?	2.2, Para 4
48	When are S.110 Companies obliged to file their accounts in iXBRL format?	3.1.5, Para 1
49	Are all entities obliged to submit Financial Statements in iXBRL format?	<u>1.1</u> and <u>5</u>
50	Do audit-exempt companies have to file Financial Statements in iXBRL format?	1.1, Para 2
51	Where consolidated accounts are prepared for a group of companies, can these Financial Statements be submitted in iXBRL format to Revenue?	3.1.6
52	Are companies that are not resident but are trading through a Branch or Agency required to submit Financial Statements in iXBRL format?	3.1.7
53	Are Companies in liquidation required to prepare and file Financial Statements in iXBRL format?	<u>1.3.1</u>

54	Do inactive companies have to file statements in iXBRL format?	<u>1.3.2</u>
55	What criteria will Revenue use to deem a company inactive and therefore waive their filing obligation?	1.3.2

Appendix III – List of changes to this TDM

Part	Changes that have taken place
1.6	Table of accepted taxonomies updated to include the 2022 taxonomies for
	FRS 101, FRS 102 and EU IFRS.

