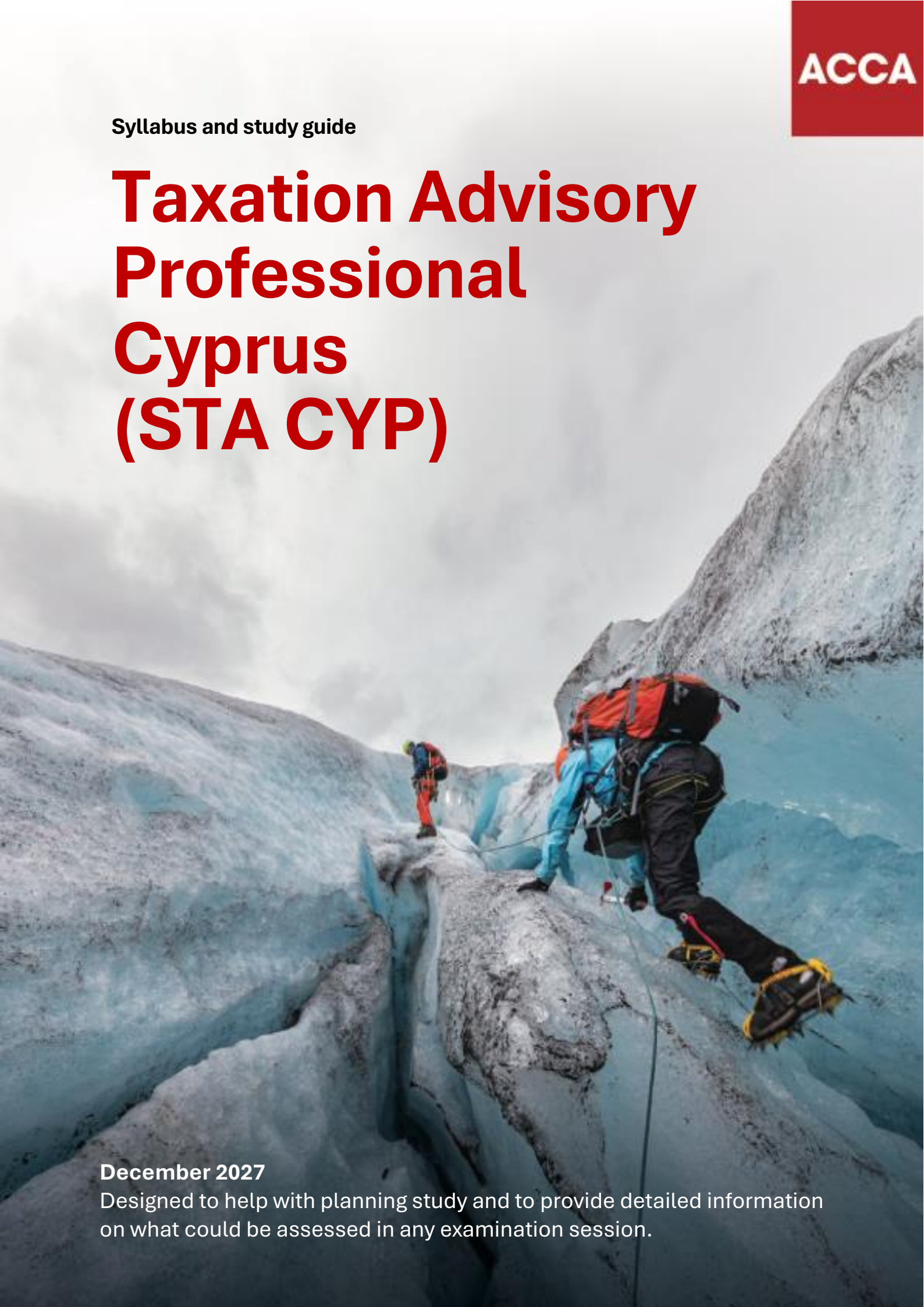
Syllabus and study guide

Taxation Advisory Professional Cyprus (STA CYP)



December 2027

Designed to help with planning study and to provide detailed information on what could be assessed in any examination session.

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1. Overall aim of the syllabus

The overall aim of the syllabus is to enable the application of relevant technical skills, advisory capabilities and professional judgement in respect of all Cyprus taxes studied previously (income tax, corporation tax, capital gains tax, special defence contribution, value added tax (VAT), social insurance contributions), to provide tailored tax advice in respect of a variety of complex personal and business contexts, including cross-border and group scenarios.

2. Introduction to the syllabus

The syllabus for Taxation Advisory Professional (STA CYP), starts by introducing candidates to how to advise individuals about personal tax issues. This covers both personal and family tax planning in addition to advising on the taxation of employment income and capital taxes.

The syllabus then focuses on taxation for businesses and corporate entities. Taxation for both owner managed businesses, single companies, and groups of companies are covered, including all stages of the life cycle of a business.

Next the syllabus moves on to consider overseas tax issues for both individuals and companies.

Finally, the syllabus covers tax compliance and ethical obligations. This ensures that candidates can advise on how and when tax returns should be filed and payments made, and the consequences of a failure to do so. In addition, it ensures candidates are aware of the vital importance of ethical obligations when carrying out taxation work.

The professional skills section of the syllabus focuses on the range of professional skills candidates should be expected to demonstrate in the examination.

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3. Main capabilities

On successful completion of this course of study, candidates should be able to:

- Evaluate the impact of relevant Cyprus taxes on a variety of situations and potential courses of action
- Advise on the interaction of relevant taxes in respect of a given situation or potential course of action
- Recommend appropriate tax planning strategies and structuring options to minimise and/or defer tax liabilities, taking into account statutory limitations, commercial substance and a taxpayer's overall objectives
- Advise on overseas and cross-border tax issues affecting individuals and companies, including the availability and optimisation of double tax relief
- Recommend a course of action following an assessment of the advantages, disadvantages and risks of possible options available to the taxpayer
- Evaluate the tax compliance obligations of a taxpayer and the consequences of non-compliance
- Advise on the ethical issues and obligations which arise in relation to the provision of tax advice

4. Intellectual levels

The ACCA Qualification syllabus is designed to progressively broaden and deepen the technical knowledge, skills and professional values demonstrated by the candidate on their journey through the qualification.

The specific learning outcomes within the detailed syllabuses and study guides are assessed at one of three intellectual or cognitive levels:

Level 1: Knowledge and comprehension
Level 2: Application and analysis
Level 3: Synthesis and evaluation

Very broadly these intellectual levels relate to the three levels of the ACCA Qualification: Knowledge, Expertise and Strategic Professional.

Each learning outcome included in the detailed study guide is given a 1, 2 or 3 superscript, denoting its intellectual level. This gives an indication of the intellectual depth at which a learning outcome could be assessed within the examination. However, while Level 1 broadly equates with the Knowledge level, Level 2 to the Expertise level and Level 3 to the Strategic Professional level of the ACCA Qualification, some lower-level skills can continue to be assessed as the candidate progresses through each level. This reflects that at each stage of study there will be the requirement to broaden, as well as deepen, capabilities.

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5. The syllabus

A Taxation of individuals

1. Personal and family tax planning
2. Employment income
3. Capital taxes

B Taxation of businesses and corporate entities

1. Owner managed business
2. Single companies
3. Groups of companies
4. Expansion, restructuring and winding up

C Overseas tax issues

1. Individuals
2. Companies

D Tax compliance and ethical obligations

1. Tax compliance
2. Ethical obligations

E Professional skills

1. Communication
2. Analysis and evaluation
3. Scepticism
4. Commercial acumen

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6. Detailed study guide

A Taxation of individuals

1. Personal and family tax planning

a) Evaluate the post-tax income generated by different sources of income.[3]

b) Advise on the tax implications of property income.[3]

c) Advise on the tax treatment of investment income and interaction with special defence contribution (SDC) and General Healthcare System contributions (GHS).[3]

d) Evaluate the tax implications of contributions made to provident funds.[3]

e) Evaluate the consequences of drawing from a provident fund.[3]

f) Advise on the social insurance and related contribution implications for individuals.[3]

g) Evaluate the types of investment and expenditure that may reduce or defer tax liabilities for individuals.[3]

h) Assess the use of available exemptions, deductions and reliefs to optimise tax outcomes within statutory limits.[3]

i) Advise on income and capital tax planning opportunities for spouses/civil partners including eligibility for and allocation of personal deductions (children, housing and green expenditure).[3]

j) Advise on the interaction between income tax, SDC where applicable, and GHS contributions in multi-source income scenarios.[3]

k) Evaluate the appropriateness of proposed tax planning measures given a taxpayer's circumstances, risk profile and objectives.[3]

2. Employment income

a) Evaluate employment packages including the calculation of post-tax income.[3]

b) Advise on the tax treatment of termination payments and lump sum receipts including the special mode of taxation of ex gratia payments.[3]

c) Advise on the tax implications of share options, share incentive schemes and equity-based remuneration including approved employer share incentive schemes.[3]

d) Recommend tax-efficient remuneration structuring options, considering total income tax, SDC and GHS interaction.[3]

e) Advise on the interaction between social insurance, GHS and income tax in structuring remuneration.[3]

f) Advise on the taxation of benefits in kind, including company cars, use of assets, and loans to employees and shareholders.[3]

3. Capital taxes

a) Assess the tax consequences of additions, alterations and improvements to immovable property.[3]

b) Advise on the capital gains tax implications of disposals involving overseas aspects and closely related persons.[3]

c) Advise on the computation of chargeable gains and allowable losses in complex scenarios.[3]

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d) Assess the impact of timing of disposal, conditional contracts and dates of transfer on tax liability.[3]

e) Evaluate valuation methods and their implications relevant to the Cyprus CGT computation.[3]

f) Advise on the interaction between capital allowances and capital gains tax in determining taxable capital gains.[3]

g) Evaluate the tax implications of disposals and part disposals of immovable property.[3]

h) Advise on the tax treatment of disposals of shares in companies holding immovable property including the indirect holding threshold.[3]

i) Advise on the optimal use of available exemptions and reliefs.[3]

j) Recommend structuring options for transactions involving immovable property to optimise tax outcomes within statutory limits.[3]

k) Advise on the tax implications of transfers between connected persons, including market value adjustments.[3]

l) Recommend the most tax-efficient course of action in capital transactions, considering compliance, anti-avoidance and commercial implications.[3]

m) Assess the liability to land transfer fees arising on transfers of immovable property.[3]

n) Advise on the capital gains tax and land transfer fee implications of gifts and transfers for no consideration.[3]

o) Advise on the availability and application of exemptions and reductions in land transfer fees.[3]

p) Recommend the tax-efficient structuring of group transactions and corporate reorganisations involving immovable property.[3]

q) Advise on compliance requirements, including time limits for payment of capital taxes.[3]

r) Advise on the administrative procedures relating to assessment, payment and refund of capital taxes.[3]

s) Advise on the application of the special contribution payable under the Central Agency for Equal Distribution of Burdens legislation.[3]

B Taxation of businesses and corporate entities

1. Owner managed businesses

a) Evaluate whether a worker would be classified as employed vs self-employed and the tax consequences thereon.[3]

b) Advise on the tax treatment of self-employment income in complex situations.[3]

c) Advise on the tax implications of incorporation, cessation and succession of a business.[3]

d) Advise on the application of capital allowances, research and development incentives and, intellectual property regimes including enhanced allowances for green and agricultural expenditure.[3]

e) Advise on the treatment of trading inventory and other adjustments on cessation.[3]

f) Assess the interaction between social insurance, GHS and income tax in structuring business income.[3]

g) Assess the VAT implications of partnerships, agents and the appointment of VAT representatives.[3]

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h) Advise on the VAT implications of domestic and cross-border supplies, including place of supply and reverse charge provisions.[3]

i) Advise on the VAT treatment of land and buildings, including leases, reduced rates and business use.[3]

j) Advise on partial exemption and input VAT recovery in complex scenarios.[3]

k) Recommend VAT-efficient structuring of transactions, considering compliance, cash flow and commercial impact.[3]

l) Advise on the types of investment and expenditure that may reduce or defer tax liabilities for businesses.[3]

m) Advise on legitimate tax planning measures available in a given scenario.[3]

2. Single companies

a) Evaluate the tax relief available on planned corporate expenditure.[3]

b) Assess how profits chargeable to corporation tax are determined in complex scenarios.[3]

c) Assess the application of the arm's length principle and related party provisions.[3]

d) Evaluate the impact of transfer pricing and thin capitalisation principles including documentation requirements.[3]

e) Advise on the carry forward of losses, including the statutory time limit and the restriction on a change in ownership.[3]

f) Advise on the application of the notional interest deduction and other corporate tax incentives.[3]

g) Advise on the taxation of specialised activities, including shipping, insurance, investment and innovative businesses.[3]

h) Recommend the use of available exemptions, deductions and reliefs to optimise tax outcomes within statutory limits.[3]

i) Evaluate the tax relief available for losses and recommend the optimal use given a company's objectives.[3]

j) Advise on VAT registration obligations, including divisional registration.[3]

k) Advise on circumstances requiring or permitting deregistration.[3]

l) Advise on the VAT implications of domestic and cross-border supplies, including place of supply and reverse charge provisions.[3]

m) Assess the VAT treatment of land and buildings, including leases, reduced rates and business use.[3]

n) Advise on partial exemption and input VAT recovery in complex scenarios.[3]

o) Advise on the VAT implications of transfers of a business as a going concern.[3]

3. Groups of companies

a) Advise on the tax implications of group structures, including group relief and loss utilisation.[3]

b) Advise on the tax implications of intra-group property and financing transactions, including related party provisions.[3]

c) Advise on the group VAT registration requirements and the merits of forming a VAT group.[3]

d) Advise on the impact of the transfer pricing and thin capitalisation rules on companies.[3]

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e) Assess the legal and administrative considerations arising from corporate tax planning.[3]

f) Recommend commercially viable and compliant corporate tax strategies.[3]

g) Recommend tax-efficient structuring options, taking into account interaction of taxes and commercial objectives.[3]

h) Advise on the tax implications of a transfer of a trade and assets where there is common control.[3]

4. Expansion, restructuring and winding up

a) Assess tax-efficient structuring of corporate reorganisations involving immovable property.[3]

b) Evaluate the tax implications of the sale of shares in a subsidiary company vs the sale of its trade and assets.[3]

c) Advise on the tax implications of a transfer of a trade and assets where there is common control.[3]

d) Evaluate the tax consequences of mergers, divisions, reconstructions and transfers of assets or activities.[3]

e) Recommend tax-efficient structuring of group reorganisations, considering commercial substance and anti-avoidance provisions.[3]

f) Advise on the tax implications of a company ceasing to trade.[3]

g) Advise on the tax implications of a company winding up.[3]

h) Advise on the tax treatment of distributions, winding up and shareholder extraction strategies including the SDC treatment of dividends out of pre- and post-2026 profits and the transitional deemed distribution rules.[3]

i) Advise on the tax implications of controlled foreign companies.[3]

j) Advise on the tax implications of corporate structures involving overseas expansion.[3]

C Overseas tax issues

1. Individuals

a) Evaluate the relevance of residence and domicile status in determining income tax and SDC liabilities including the 60-day rule and the elective lump sum for long-term non-domiciled individuals.[3]

b) Advise on the tax implications of individuals coming to or leaving Cyprus, including timing and planning considerations.[3]

c) Advise on the taxation of overseas income and the interaction with domestic tax rules.[3]

d) Advise on the availability and optimisation of double taxation relief.[3]

e) Evaluate the implications of double tax treaties in complex scenarios.[3]

2. Companies

a) Advise on corporate residence and its implications for corporation tax and SDC including the incorporation test.[3]

b) Assess the tax consequences of setting up an overseas subsidiary.[3]

c) Assess the tax consequences of a Cyprus resident company receiving overseas income.[3]

d) Advise on the tax position of overseas companies trading in Cyprus.[3]

e) Evaluate the impact of an overseas company within a group on group tax planning.[3]

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f) Evaluate whether a company is a controlled foreign company (CFC) and advise on the tax implications of CFCs.[3]

g) Advise on the availability and optimisation of double taxation relief for companies.[3]

h) Evaluate the impact of double tax treaties on corporate taxation.[3]

i) Advise on the VAT implications of imports and exports.[3]

j) Advise on withholding taxes on payments to non-residents and on exit taxation.[3]

D Tax compliance and ethical obligations

1. Tax compliance

a) Advise on compliance obligations in Cyprus, including registration, filing, payment deadlines and consequences of late or incorrect submission.[3]

b) Evaluate how taxpayer actions and timing decisions affect tax liabilities, cash flow, penalties and exposure to additional assessments.[3]

c) Advise on procedural requirements and statutory time limits for claims, elections, objections and amendments.[3]

d) Advise on record-keeping and documentation requirements to support tax positions and ensure compliance.[3]

e) Evaluate the implications of tax enquiries, audits and assessments and advise on appropriate responses including time limits for assessments.[3]

2. Ethical obligations

a) Recommend safeguards to address threats to the ACCA fundamental principles arising in tax engagements.[3]

b) Evaluate conflicts of interest in tax practice and advise on appropriate actions, including safeguards or withdrawal.[3]

c) Advise on professional and regulatory procedures when accepting or continuing a client relationship.[3]

d) Evaluate appropriate actions where errors, non-compliance or irregularities are identified in a tax return or tax position.[3]

e) Advise on the distinction between tax planning, avoidance and evasion and the implications under anti-abuse provisions.[3]

f) Evaluate the balance between tax efficiency, compliance risk and commercial substance.[3]

E Professional skills

1. Communication

a) Inform concisely, objectively and unambiguously, adopting a suitable style and format, and using appropriate technology.[3]

b) Advise using compelling and logical arguments, demonstrating the ability to counter argue where appropriate.[3]

c) Clarify and simplify complex issues to convey relevant information in a way which adopts an appropriate tone and is easily understood by and reflects the requirements of the intended audience.[3]

2. Analysis and evaluation

a) Investigate relevant information from a range of sources, using appropriate analytical techniques, to establish reasons and causes of issues, to assist in decision making and to identify opportunities or solutions.[3]

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b) Consider information, evidence and findings in a careful and structured way, reflecting on their implications and how they can be used to best support the interests of the individual, entity or wider business organisation.[3]

c) Assess and apply appropriate judgement when considering ethical, professional or other technical issues, when making conclusions and recommendations, taking into account the implications of such decisions on the entity or individual affected.[3]

d) Appraise information objectively and logically in order to prioritise issues, identify missing information and explore suitable alternatives when making decisions, devising courses of action or providing conclusions or recommendations.[3]

3. Scepticism

a) Explore the underlying reasons for issues, applying the attitude of a questioning mind where appropriate, beyond what is immediately apparent.[3]

b) Question opinions, assertions and assumptions by seeking justifications and obtaining sufficient evidence for either their support and acceptance, or rejection, as well as challenging any limitations or inadequacies in the information available, outlining additional information required to provide a full analysis.[3]

c) Challenge and critically assess the information presented or decisions made in a professional and courteous manner, where this is clearly justified to be in the wider professional, ethical, organisational or public interest.[3]

4. Commercial acumen

a) Demonstrate awareness of organisational, external and other non-tax factors which will affect decisions taken with regard to tax by an individual or an entity.[3]

b) Recognise key issues in a given scenario and use judgement in proposing and recommending commercially viable solutions.[3]

c) Show insight and perception in understanding key tax drivers of an individual or entity, demonstrating acumen in arriving at appropriate recommendations.[3]

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7. Reading list

ADVANCED CYPRUS TAXATION – STUDY TEXT & REVISION TEXT – By Polina Jacovidou Michael

Tax Department tax news and circulars available on the Tax Department website.

Tax Department tax guides available on the Tax Department website.

8. Approach to examining the syllabus

The Taxation Advisory Professional (STA CYP) examination builds upon the technical knowledge and skills examined in the E1 Taxation (E1 CYP) examination. At the Strategic Professional level, candidates will be expected to demonstrate an integrated approach to the subject combined with professional skills to apply more than one tax to a given scenario and offer appropriate advice. The study guide outlines the range of scenarios with each relevant tax inherent within the scenario, which specifies the wide range of contextual application which is required to achieve a satisfactory standard at this level.

The syllabus is assessed by a three-hour 15-minute computer-based examination.

The examination will consist of two sections:

Section A will contain one 50-mark question

Section B will contain two 25-mark questions

Section A

Section A of the examination will be a 50-mark scenario-based question examining multiple taxes. The 50 marks will comprise 40 technical marks and 10 professional skills marks. All four professional skills marks will be examined in Section A.

Section B

Candidates will be required to answer a further two 25-mark questions in Section B of the examination. Both questions will be scenario based and most likely examine multiple taxes. Each 25-mark question will comprise 20 technical marks and five professional skills marks. Each Section B question will examine a minimum of two professional skills from analysis and evaluation, scepticism and commercial acumen as appropriate to the question.

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9. Guide to ACCA examination structure and delivery mode

The structure of examinations varies, depending on the level of the qualification.

The Strategic Professional level is comprised of Essentials and Options examinations. The Strategic Professional examinations contain 100% compulsory questions to encourage candidates to study across the breadth of each syllabus.

The Essential examinations are S1 Business and Sustainability Reporting and S2 Strategic Business Leader.

The S1 Business and Sustainability Reporting examination contains two sections and is comprised of 80 technical marks and 20 professional ethics and professional skills marks.

S2 Strategic Business Leader is ACCA's case study examination and includes pre-seen information which is released to candidates two weeks prior to the examination sitting. The pre-seen information contains background and contextual details in order for candidates to familiarise themselves with the fictitious organisation which they will be examined on and the industry in which it operates. This examination contains 80 technical marks and 20 professional skills marks.

All Options examinations have two sections and contain a total of 80 technical marks and 20 professional skills marks.

All Strategic Professional examinations are assessed by three-hour 15-minute computer-based examinations. ACCA will provide permitted reference materials for candidates to use during the examinations.

The pass mark for all Strategic Professional examinations is 50%.

10. Guide to ACCA examination assessment

ACCA reserves the right to examine anything contained within the study guide at any examination session. This includes knowledge, techniques, principles, theories, and concepts as specified.

For specified financial accounting, audit and tax examinations, except if indicated otherwise, ACCA will publish examinable documents once a year to indicate exactly what regulations and legislation could potentially be assessed within identified examination sessions. For most examinations (not tax), regulation issued, or legislation passed on or before 31 August annually, will be assessed from 1 September of the following year to 31 August of the year after. Please refer to the examinable documents for the examination (where relevant) for further information.

Regulations issued or legislation passed in accordance with the above dates may be examinable if the effective date is in the future, unless explicitly stated otherwise in the syllabus and study guide or examinable documents. The terms 'issued' or 'passed' relate to when regulation or legislation has been formally approved.

The term 'effective' relates to when regulation or legislation must be applied to entity transactions and business practices.

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The study guide offers more detailed guidance on the depth and level at which the examinable documents will be examined. The study guide should therefore be read in conjunction with the examinable documents list, where applicable.

For STA CYP, generally examinations in June and December will be based on regulation or legislation published in the Official Gazette of the Republic of Cyprus ("the Gazette") by 30 September of the previous year. Note: Exceptionally, the examination in June 2027 will be based on legislation passed by 30 September 2025 and only the examination in December 2027 will be based on legislation passed by 30 September 2026.

11. Learning hours and education recognition

The ACCA Qualification does not prescribe or recommend any particular number of learning hours for examinations because study and learning patterns and styles vary greatly between people and organisations. This also recognises the wide diversity of personal, professional and educational circumstances in which ACCA candidates find themselves.

As a member of the International Federation of Accountants, ACCA seeks to enhance the education recognition of its qualification on both national and international education frameworks, and with educational authorities and partners globally. In doing so, ACCA aims to ensure that its qualifications are recognised and valued by governments and regulatory authorities and employers across all sectors. To this end, ACCA qualifications are currently recognised on the educational frameworks in several countries. Please refer to your national education framework regulator for further information about recognition.

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