



**CERTIFIED PUBLIC ACCOUNTANT  
FOUNDATION LEVEL 2 EXAMINATIONS  
F2.4 TAXATION  
DATE: MAY 2024  
MARKING GUIDE AND MODEL ANSWERS**

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## QUESTION ONE

### Marking guide

Question one (a)	Marks
<b>Computation of the taxable income</b>	
Each point 1 mark on every transaction except:	10
On Revenues, award 2 marks	2
On withholding tax, award 2 marks	2
On computation of Percentage of completion award 1marks	1
<b>Question one (b)</b>	
<b>Different tax certificates issued by Rwanda Revenue Authority</b>	
Award 0.5 mark for each tax certificate and 0.5 mark for explanations. (Maximum: 5 marks)	5
<b>Total Marks</b>	<b>20</b>

### Model answer

#### A. Computation of the taxable income

Particulars	Workings	Amount FRW	Amount FRW
Revenues	58%* 2,000,000,000		1,160,000,000
<u>Less allowable expenses</u>			
Salaries		82,400,000	
Hire of machineries		123,000,000	
Communications		6,700,000	
Purchase of materials		218,000,000	
Repair and maintenance		39,200,000	
Utilities		12,500,000	
Capital allowance		46,525,000	
Fuel		64,000,000	
Stationaries		12,300,000	
		604,625,000	604,625,000
Taxable income			555,375,000
CIT	30% *555,375,000		166,612,500
Less withholding tax	3%*2,000,000,000*58%		34,800,000
<b>Tax payable</b>			<b>131,812,500</b>

**Workings:**

Percentage of completion = Cost incurred / Estimated cost	$(874,625,000/1,500,000,000)*\%=58\%$
Revenues accruing to the period = Percentage of completion * contract price	

**B. Different tax certificates issued by RRA are explained below:**

1. Value added tax (VAT) certificate  
VAT certificate certifies that the taxpayer is registered for VAT. All VAT registered taxpayers are required to clearly display the VAT registration in plain view of their main place of business.
2. Tax clearance certificate (TCC)  
Are available upon request, to prove that taxpayers have no unpaid tax arrears with RRA. taxpayers may need TCC, when they need to bid for public tenders, to apply for bank loans, or other reasons.
3. Quitus Fiscal Certificate  
Is a privileged status given to a taxpayer who have a good compliance record with RRA upon request. Taxpayers with Quitus fiscal are not required to pay WHT 5% on imports, or be withheld WHT 3%.
4. Withholding Certificate  
This Certificate is available for the persons who want to prove that they have withheld and paid taxes in Rwanda.
5. Trading License Tax Certificate  
The Trading License Tax Certificate is obtained after declaring and paying Trading License Tax. It is printed out from the LGT system. The Trading License Tax Certificate must be clearly displayed by all businesses, and branches. It is illegal to conduct profit-oriented activities of any kind without a trading license certificate.

## QUESTION TWO

### Marking guide

<b>Question three (a)</b>	<b>Marks</b>
<b>Computation of the taxable profit or loss for the year</b>	
Add backs: award 1 mark for each transaction as follows: (Maximum: 14 marks)	
Office cleaners' salary	1
Bad debts	1
Depreciation	1
Tax paid	1
WHT tax	1
Repair and maintenance/ Land purchase	1
Donation	1
Communication	1
<u>Less</u>	
Income from agricultural activities (12 m are exempted)	2
Allowable wear and tear	1
Loss brought forward from previous period	1
Adjusted total taxable income	1
Working1: Computation Wear and tear	
Award 1 mark for well computed depreciation of each category of assets. (Maximum: 4 marks)	4
<b>Question three (b)</b>	
<b>Computation of the tax liability for the year</b>	
Award marks for well computed tax liability as follows: (Maximum: 2 marks)	
Tax for the year	1
Withholding tax on imports	1
Quarterly prepayment	1
<b>Total Marks</b>	<b>20</b>

**Model answer**

i. **Umukunzi Rebecca**

**Statement of adjusted taxable profit or loss for the year ended 31/12/2021.**

Items	Workings	Amount "000" Frw	Amount "000" Frw
Profit before tax			21,063
Add non-allowable deductions			
Office cleaners' salary	Allowed	-	
Interests expenses	Allowed	-	
Bad debts		11,000	
Depreciation		14,000	
Tax paid		8,800	
WHT tax		5,600	
Repair and maintenance/ Land purchase		16,800	
Donation	5,000 - (1% * 152,000)	3,480	
Communication	(20%*16,000)	3,200	62,880
			83,943
<u>Less non-taxable income:</u>			
Income from agricultural activities			-12,000
Total income			71,943
<u>Less allowable deductions</u>			
Allowable wear and tear	W1	-15,500	
Loss brought forward from previous period		-27,000	-42,500
Adjusted total taxable income			29,443
<u>Computation of tax to be paid</u>			
0 - 360,000		-	0
360,001 - 1,200,000	(1,200,000-360,000)*20%	168	
	(29,443-1,200)* 30%	8,473	
Tax for the year			8,641
<u>Less</u>			
Withholding tax on imports		5,600	0
Income Quarterly prepayment		8,800	-14,400
Tax to be refundable			-5,759

**W1: Computation of wear and tear**

Assets	Land	Building	Computer	Accounting Software	Motor vehicle	Total Wear and Tear
Cost	45,000	56,000	12,000	32,000	14,000	
Addition	27,000	-	-	-	-	
Dep Value	72,000	56,000	12,000	32,000	14,000	
W&T rate	0%	5%	50%	10%	25%	
Depreciation charge	0	2,800	6,000	3,200	3,500	<b>15,500</b>

**QUESTION THREE****MARKING GUIDE**

QUESTION THREE	DETAILS	MARKS	TOTAL MARKS
<b>a.i)</b>	Award 1 Mark on example according to nature and 2 Marks according who bears the burden of the tax. Max 03 Marks	3	
<b>a.ii)</b>	Award 1 Mark for Value Added Tax (VAT) and 1 Mark for CIT. Max. Marks	2	
<b>Total</b>			<b>5</b>
<b>b</b>	Credit sales to XYL Ltd	0.5	
	Cash sales to Local customers	0.5	
	Cash sales to Ndoli Supermarket	0.5	
	Cash Sales to LY Ltd	0.5	
	Cash sales to Amahoro ltd	0.5	
	Exported Goods to USA	0.5	
	Supplying wheel chairs	1	
	Office stationeries	1	
	Airtime and internet to the staff	1	
	Purchases from BRALIRWA	1	
	Returns Out	1	
	Input VAT apportionment	1	
	VAT Payable/ Claimable for Ximena Limited Companyx	1	
<b>b ii</b>	Award 0.5 mark for each valid point	2	
	Award 1 mark for each valid point	3	
<b>Total</b>			<b>15</b>
<b>Total Marks</b>			<b>20</b>

## MODEL ANSWER

### a) i.

#### According to nature:

1. Personal, poll or capitation tax: Tax of fixed amount on individuals residing within a specified territory, without regard to their property, occupation or business
2. Property: Imposed on property
3. Excise: Imposed on enjoyment of a privilege

#### According to who bears the burden of the tax:

1. Direct tax: Tax imposed or levied on the person/individual's income and cannot be shifted to another payer. Eg: CIT
2. Indirect tax: Tax that is levied upon goods and services before they reach the customer who ultimately pays the indirect taxes a part of market price of goods and services purchased. Eg: VAT

### a) ii.

Value Added Tax (VAT) is not burden to Manufacturers of tiles in Rwanda due to the fact that it can be shifted to customers as under VAT, it is solely paid by the last consumer. However, Corporate Income Tax (CIT) is burden to the Manufacturers of tiles in Rwanda due to the fact that it is levied on the income and cannot be shifted to the customers.

## b) Computation of VAT Payable/ Claimable for Ximena Limited Company for the month of November 2021

### Output VAT, value in FRW

Date	Description	Standard	Zero	Exempt	Total	VAT@18%&0%
5/11/21	Credit sales to XYL Ltd	130,000	-	-	130,000	23,400
20/11/21	Cash sales to Local customers	6,360,000	-	-	6,360,000	1,144,800
8/11/21	Cash Sales to Ndoli Supermarket	2,000,000	-	-	2,000,000	360,000
8/11/21	Cash Sales to LY Ltd	405,000	-	-	405,000	72,900
11/11/21	Cash Sales to Amahoro Ltd	7,500,000	-	-	7,500,000	1,350,000
25/11/21	Exported sales to USA	-	3,000,000	-	3,000,000	0
21/11/21	Supplying wheel chairs	-	-	2,400,000	2,400,000	N/A
<b>Total</b>		<b>16,395,000</b>	<b>3,000,000</b>	<b>2,400,000</b>	<b>21,795,000</b>	<b>2,951,100</b>

### Input VAT IN FRW

Date	Description	Standard	Zero	Exempt	Total	VAT @18%
2/11/21	Office stationeries	2,350,000	0	0	2,350,000	423,000
2/11/21	Airtime and internet to the staff	5,400,000	0	0	5,400,000	972,000
2/11/21	Drinks from BRALIRWA	12,000,000	0	0	12,000,000	2,160,000
2/11/21	Returns Out	-2,400,000	0	0	-2,400,000	-432,000

<b>Total</b>	<b>17,150,000</b>	<b>0</b>	<b>0</b>	<b>17,150,000</b>	<b>3,123,000</b>
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<p><b>Allowable Input VAT=General input VAT*<math>\frac{\text{Taxable Sales}}{\text{Total Sales}}</math></b></p> <p><math>= (423,000+972,000) = 1,395,000 * \frac{19,265,000}{21,665,000} = \text{FRW } 1,240,465</math></p> <p>Total allowable input=1,240,465+1,728,000= <b>Frw 2,968,465</b></p> <p>VAT Payable/ Claimable for Ximena Limited Company for the month of November 2021=<b>FRW2,951,100-FRW 2,968,465= FRW (17,365)</b></p>
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<b>Descriptions</b>	<b>Amount</b>
Total sales	21,665,000
Taxable sales	19,265,000
Exempted sales	2,400,000

**ii. The article 10 of the VAT law states that VAT taxation period is the one that comes earliest among the following:**

- a) Date of issuance of invoice
- b) Date of payment of goods or services except the advance received by the constructors who reimburse it on the invoice issued to the client
- c) Date on which goods are being removed from the premises of the supplier
- d) Date of service delivery.

### **iii. Denial of input VAT**

**Input VAT is not allowed on the following:**

- a) Passenger vehicles and its accessories unless the normal business of the taxpayer involves the resell or rent of the same vehicles.
- b) Goods acquired for accommodation purpose unless the business of the taxpayer involves the provision of accommodation in the normal course of the business.
- c) Goods acquired for entertainment purpose unless the business of the taxpayer involves the provision of entertainment in the normal course of the business.



## QUESTION FOUR

### Marking guide

Criteria	Marks
<b>(a)</b>	
Award 1 mark for a well definition of pre- clearance and 1 mark for each example provided (Maximum 5 marks)	<b>5</b>
<b>(b)</b>	
1 mark for meaning of quick release with deposit and 1 mark for each example (Total 4 marks) and 1 mark for meaning of quick release without deposit and 1 mark for each example (Total 4 marks) (Maximum 6 marks)	<b>8</b>
<b>(c)</b>	
Award 1 mark for each tax computed (Total 6 marks) and 1 mark for showing how the cost will be recognized in the financial statement (Maximum 7 marks)	<b>7</b>
<b>Do Not Award (DNA) the marks on total</b>	
<b>Total marks for question 4</b>	<b>20</b>

### Model answers

**(a)**

**The pre-clearance facility** is a quick release procedure that allows the clearing agent to begin the declaration process for certain goods before they arrive at a border post.

**4 examples of goods that can be granted the pre-clearance facility includes:**

- ✓ Imported goods produced within the EAC, also referred to as Intra-Regional Trade
- ✓ Perishable goods, such as:
  - Food
  - Medicine
  - Live animals
- ✓ Fragile or difficult to unload goods.
- ✓ Government institution or project materials.
- ✓ Dangerous goods such as acids and explosives
- ✓ Diplomatic goods
- ✓ Agricultural inputs

For Intra-Regional Trade, this facility is granted automatically and no application is required. The clearing agent can immediately begin the declaration process.

For other consignments, of goods produced outside the EAC, the clearing agent can apply for pre-clearance in the Rwanda electronic Single Window (ReSW) system. If the request for pre-clearance is approved, the clearing agent can begin the declaration process and pay any due taxes and fees as normal before reaching the border post or dry port.

**(b)**

Actually, a **quick release** allows the customs procedures for certain goods to be carried out at a taxpayer's premises rather than at border posts or dry port, subject to approval.

**Quick release with deposit:** This is where goods can be granted quick release after payment of the deposit.

**Example of those goods include:**

- ✓ Perishable goods
- ✓ Factory machinery spare parts or other factory material that may stop the functioning of the factory in case of shortage
- ✓ Fragile goods that can be damaged when offloaded e.g. glasses
- ✓ Goods that are not offloaded in Kigali due to Contracts between the importer and the transporter e.g. Malt for BRALIRWA offloaded at GISENYI
- ✓ Goods with doubtful origin in case investigations are being conducted on the certificate of origin.

**Quick release without deposit:** This is where the goods are granted Q.R special regime without payment of the deposit.

**Example of those goods includes:**

- ✓ Goods exempted from payment of duties and taxes.
- ✓ Goods that belong to the Government of Rwanda
- ✓ Bank coins and notes

**(c) Computation of the total costs of vehicles**

Description	FRW
Cost	32,000,000
Insurance	800,000
Freight	1,800,000
<b>CIF</b>	<b>34,600,000</b>
Import duty (25% of CIF)	8,650,000
Excise duty (10% of (CIF+Import duty))	4,325,000
<b>Total cost before VAT</b>	<b>47,575,000</b>
VAT (18%)	8,563,500
Infrastructure development levy 1.5% of CIF	519,000
Withholding tax @ 5% of CIF	1,730,000
Africa Union Levy 0.2% of CIF	69,200
Quality inspection fees 0.2% of FOB	64,000
Computer processing fees	3,000
<b>Total cost of the vehicle</b>	<b>58,523,700</b>

**Recognition of the vehicle cost in the financial statement of ABC Ltd**

Because this vehicle was bought to be used by the Executive Director of the ABC Ltd, then the VAT paid will be capitalized on the cost of vehicle as it will not be reclaimed back from RRA while the Withholding tax will be claimed back from the Tax administration.

**Double entry:**

	FRW	FRW
Dr vehicle cost	56,793,700	
Cr Bank		56,793,700

**QUESTION FIVE****Marking guide**

Criteria	Marks
<b>(a)(i)</b>	
Award 1 mark for each interest income stated not subject to withholding tax (Maximum 3 marks)	<b>3</b>
<b>(a)(ii)</b>	
0.5 mark for each point stated on Capital gain max 4 points	<b>2</b>
<b>(b)(i)</b>	
Award 4 marks for the good different between Tax on gaming activities and Withholding tax on winnings on gaming activities and 0.5 marks for Tax on gaming activities rate and 0.5 marks for withholding tax rate (Maximum 5 Marks)	<b>5</b>
<b>(b)(ii)</b>	
2 marks for computing Tax on gaming activities and 2 marks for computing Withholding tax on winning on gaming activities (Maximum 4 Marks)	<b>4</b>
<b>(c)(i)</b>	
Award 1 mark for reasons for issuance of a notice of assessment (Maximum 3 Marks)	<b>3</b>
<b>(c)(ii)</b>	
Award 1.5 marks for each circumstance when the Tax Administration is entitled to the right of starting audit without notice (Maximum 3 marks)	<b>3</b>
<b>Do Not Award (DNA) the marks on total</b>	
<b>Total marks for question 7</b>	<b>20</b>

**Model answers****(a)(i)****The interest income that are not subject to withholding tax in Rwanda are:**

1. Interests on deposits in financial institutions for at least a period of one year.
2. Interests on loans granted by a foreign development financial institution exempted from income tax under applicable law in the country of origin.
3. Interests paid by banks operating in Rwanda to banks or other foreign financial institutions.

**(a)(ii)**

**The taxation of the capital gain**

- a) Capital gain is a difference between the proceeds from the sale of share and the acquisition cost of the same shares.
- b) Capital gain is taxed at 5% Withholding tax which withheld by the company in which transactions are taking place.
- c) Capital gain is exempted from tax if it has been traded by the company which is listed on the capital market.
- d) Capital gain is payable on 15<sup>th</sup> day of the following month after the month in which transaction has taken place.

**(b)(i)**

These tax types are both types of withholding taxes. In both cases, they are withheld and paid by the betting company, referred to as the taxpayer. However, tax on gaming activities is paid by the taxpayer on their income from gaming activities, this tax is calculated based on the difference between the total amount placed for betting and the winnings awarded. whilst withholding tax on winnings on gaming activities is withheld on behalf of the player on the player's gambling proceeds and it is calculated based on the difference between winnings of the player and amount invested by the player. In each case, the taxpayer or player who is withheld from is then able to claim the tax paid back in income declarations.

The tax rate for gaming activities is 13% while for withholding tax rate on winnings on gaming activities is 15%

**(b)(ii)**

Amount placed for betting: FRW 200,000,000

Awarded amount to winners: FRW 80,000,000

Winners' Investment: FRW 25,000,000

✓ Tax on gaming activity (Tax Liability) will be FRW  $(200,000,000 - 80,000,000) \times 13\% =$  FRW 15,600,000

✓ Withholding tax on winning on gaming activities is computed based on the difference between winnings of the player and amount invested by the player, which is 15% of  $(FRW 80,000,000 - FRW 25,000,000) \times 15\% =$  FRW 8,245,500

**(c)(i)**

A notice of assessment is issued when:

1. The tax declared on time has not been paid.
2. The audit by the Tax Administration indicates an additional tax to be paid.
3. There are serious indications that the taxpayer has the intention to evade tax.

**(c)(ii)**

The Tax Administration is entitled to the right of starting assessment procedure without notice when:

1. Acts of tax evasion;
2. The taxpayer does not cooperate with tax audit officers or fails to provide the explanations requested the taxpayer was unwilling to cooperate with a tax audit officers or did not provide the information requested.

## QUESTION SIX

### Marking Guide

Question 2	Details	Total Marks
	Award 0.5 mark on each well computed accelerated depreciation on each category of asset in 2020	3.5
	Award 0.5 mark on each well computed wear and tear allowance on each category of asset of 2020	3.5
	Award 0.5 mark on each well computed accelerated depreciation on in 2021	0.5
	Award 0.5 Mark of asset disposed	0.5
	Award 0.5 mark on each well computed depreciable base on each category of asset of 2021 except land	3.5
	Award 0.5 mark on each well computed wear and tear allowance on each category of asset of 2021.	3.5
	Award 1 Mark for a well explanation on depreciation	1
	Award 1 mark for definition on finance and 1 mark for operating lease	2
	Award 1 mark for each condition provided	2
	<b>Total Marks</b>	<b>20</b>

## Model Answer

### i. Computation of the capital allowances of Moses Engineering Business Group for the years ended 2020 and 2021

Assets	Land	Office building	Heavy Excavators	Three tractors	Motor vehicle	Furniture	Computers	Software	Total
	"000"	"000"	"000"	"000"	"000"	"000"	"000"	"000"	"000"
Total cost	389,000	840,000	2,100,000	650,000	340,000	74,000	96,800	295,000	
Acc. Dep rate		50%	50%	50%	50%	50%	50%	50%	
Acc. Dep 2020		420,000	1,050,000	325,000	170,000	37,000	48,400	147,500	2,197,900
W & T basis 2020		840,000	2,100,000	325,000	170,000	37,000	48,400	295,000	
W & T rate		5%	5%	25%	25%	25%	50%	10%	
W & T 2020		42,000	105,000	81,250	42,500	9,250	24,200	29,500	333,700
Total allowance 2020		462,000	1,155,000	406,250	212,500	46,250	72,600	177,000	<b>2,531,600</b>
WDV 31/12/2020		378,000	945,000	243,750	127,500	27,750	24,200	118,000	
Opening balance 2021		378,000	945,000	243,750	127,500	27,750	24,200	118,000	
<b>Addition</b>		<b>0</b>		<b>415,400</b>	<b>0</b>		<b>0</b>	<b>0</b>	
Disposal		0	0		0		-1,700	0	
Acc. Dep rate 2021		0%		50%	0%	0%	0%	0%	
Acc. Dep 2021		0		207,700	0	0	0	0	207,700
W & T basis 2021	389,000	840,000	2,100,000	451,450	127,500	27,750	22,500	295,000	3,864,200
W & T rate 2021		5%	5%	25%	25%	25%	50%	10%	
W & T 2021		42,000	105,000	112,863	31,875	6,938	11,250	29,500	339,425
Total allowance 2021		42,000	105,000	320,563	31,875	6,938	11,250	29,500	<b>547,125</b>

### ii.

For the asset under pooling category, if the depreciation base is equal or less than FRW 500,000 , the total amount will be allowed as expense.

### iii.

For the assets under lease agreement, the depreciation will be claimed by lessee in case of finance lease while under operating lease, the depreciation is claimed by the lessor.

### iv.

**Asset to be entitled accelerated depreciation should fulfil the following conditions:**

- a) Asset should have a value of USD 50,000 each
- b) The company should be categorized under the following sectors
  1. MNUFACTURING
  2. HEALTH
  3. EDUCATION
  4. AGROPROCESSING
  5. EXPORTATION etc....
- c) Asset should be kept at least 3 years in the company.

## QUESTION SEVEN

### Marking Guide

Question	Details	Total Marks
7		
<b>i</b>	Award 1 Mark as follows:	
	Basic salary	0.5
	Communication allowance	0.5
	Cash allowance	1
	Housing allowance	1
	Children school fees	1
	Pension contribution (Public)	1
	Private pension contribution	1
	<u>Benefits in kind</u>	
	Company car	1.5
	Loan benefit	1.5
	<b>Total taxable employment income</b>	0.5
	<u>Computation of tax to be paid</u>	
	0 - 60,000	0.5
	60,001 - 100,000	0.5
	100,001 – and above	0.5
	Tax liability	
	<u>Total marks</u>	
<b>ii</b>	Award 1 Mark on each explained exemption of employment income	<b>3</b>
<b>iii</b>	Award 1 Mark for each exempted income provided	<b>3</b>
<b>iv</b>	Award 1 Mark for each benefit provided	<b>3</b>
	<b>Total Marks</b>	<b>20</b>

## Model Answer

### A. Computation of taxable employment income and tax payable for Karenzi Benjamin in the month of December 2022.

Particulars	Workings	Amount	FRW
Basic salary			7,200,000
Communication allowance			250,000
Cash allowance			300,000
Housing allowance			<b>800,000</b>
Children school fees			1,000,000
Public pension contribution	W 1	Allowed	0
<b>Total cash emoluments</b>			<b>9,550,000</b>
<u>Benefits in kind</u>			
Company car	10% *9,550,000		955,000
Loan benefit	(10% -5.5%) * 50,000,000) /12		187,500
Private p contribution	W 2		1,069,250
<b>Total taxable employment income</b>			<b>11,761,750</b>
<u>Computation of tax to be paid</u>			
0 - 30,000	-		-
30,001 - 100,000	0	(100,000- 30,000) *20%	14,000
100,001 and above	0	(11,761,750- 100,000)*30 %	3,498,525
<b>PAYE payable</b>			<b>3,512,525</b>

WORKINGS		
<b>Working (W1) pension contribution</b>		
Allowed Statutory pension Requirement (5% x 10,692,250)	534,613	allowed
<b>W2 private pension Contribution</b>		
Amount contributed (10%*10,692,250)		1,069,225



**B. Persons exempted from employment income tax are as follows:**

- 1° A foreigner who represents his/her country in Rwanda.
- 2° Any other individual employed in any Embassy, Legation, Consulate or Mission of a foreign state performing State affairs, who is a national of that State and who owns a diplomatic passport.
- 3° Anon-citizen individual employed by an international organization.

**C. Income that are exempted from employment income tax are as follows:**

- a) Reimbursement of expenses incurred by an employee or his associate wholly used for the business of his/ her employer.
- b) Contributions made by the employer to his/her employee to the public social security fund
- c) Pension payment from the public social security fund or from qualified fund.

**D. Benefit in Kind as per the Income tax law are as follows.**

- a) **The provision of the company car to the employee:** if an employer provides an employee with a company car, this will be valued at 10% of the total employment income excluding benefits in kind.
- b) **The provision of the company house to the employee:** if an employer provides an employee with a company house, this benefit will be valued at 20% of the total employment income excluding benefits in kind.
- c) **The provision of the Loan or salary advance to the employee:** if a company provides an employee with a company loan or salary advance exceeding 3 months' salary, the benefits will be the difference between the interest actually paid and the interest that should have been paid by using the National bank of Rwanda (BNR) rate offered to the commercial banks.

**END OF MARKING GUIDE AND MODEL ANSWERS**