



# Corporation Tax Act 2009

## 2009 CHAPTER 4

### PART 5

#### LOAN RELATIONSHIPS

#### CHAPTER 18

##### GENERAL AND SUPPLEMENTARY PROVISIONS

##### *Connections between persons*

#### **470 Section 469: supplementary provisions**

- (1) For the purposes of conditions D and E in section 469 assets are taken to be of the same kind if they—
  - (a) are treated as being of the same kind by the practice of any recognised stock exchange, or
  - (b) would be so treated if dealt with on such an exchange.
- (2) For the purposes of condition E in section 469 an asset is beneficially owned by a connected company if there is a connection between—
  - (a) the company which beneficially owns it, and
  - (b) a company which stands in the position of a debtor as respects the money debt by reference to which any loan relationship represented by that asset exists.
- (3) Whether there is a connection for the purposes of subsection (2) at any time in an accounting period (“the relevant time”) is determined in accordance with section 466(2), (3), (5) and (6)—
  - (a) applying the conditions in section 466(2) only at the relevant time, and
  - (b) ignoring section 468.

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*Changes to legislation:* There are outstanding changes not yet made by the legislation.gov.uk editorial team to Corporation Tax Act 2009. Any changes that have already been made by the team appear in the content and are referenced with annotations. (See end of Document for details) [View outstanding changes](#)

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**Modifications etc. (not altering text)**

- C1** Pt. 5 modified (with effect in accordance with s. 148 of the amending Act) by [Finance Act 2012 \(c. 14\)](#), [s. 88\(1\)\(2\)\(7\)](#) (with [s. 147](#), [Sch. 17](#))
- C2** Ss. 466-471 applied by 2010 c. 4, s. 937K(8) (as inserted (with effect in accordance with Sch. 16 para. 5 of the amending Act) by [Finance Act 2010 \(c. 13\)](#), [Sch. 16 para. 3](#))
- C3** Ss. 466-471 applied by 2010 c. 4, s. 938E(11) (as inserted (19.7.2011) by [Finance Act 2011 \(c. 11\)](#), [Sch. 5 para. 2](#))
- C4** Ss. 466-471 applied by 2010 c. 4, s. 357GD(11) (as inserted (with effect in accordance with Sch. 2 para. 7 8 of the amending Act) by [Finance Act 2012 \(c. 14\)](#), [Sch. 2 para. 1\(1\)](#))

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**Changes and effects yet to be applied to the whole Act associated Parts and Chapters:**

- Blanket amendment words substituted by [S.I. 2011/1043 art. 34](#)

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- s. 322(2A)(zb) inserted by [2016 c. 24 s. 73\(5\)](#)
- s. 934(1A)(1B) inserted by [2023 c. 30 Sch. 2 para. 12\(2\)](#)
- s. 962(3A) inserted by [2023 c. 30 Sch. 2 para. 12\(5\)\(b\)](#)
- s. 962A(3A) inserted by [2023 c. 30 Sch. 2 para. 12\(6\)\(b\)](#)
- s. 963(1A) inserted by [2023 c. 30 Sch. 2 para. 12\(7\)\(a\)](#)
- s. 1058B(5)(ea) inserted by [2023 c. 20 Sch. para. 57](#)
- s. 1094(2A)-(2C) inserted by [2012 c. 14 Sch. 3 para. 13\(3\)](#)
- s. 1106(4A)-(4C) inserted by [2012 c. 14 Sch. 3 para. 14\(3\)](#)
- s. 1138A applied by [S.I. 2024/348 reg. 3](#)