
Changes to legislation: There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Paragraph 147. (See end of Document for details)

SCHEDULES

SCHEDULE 8

MINOR AND CONSEQUENTIAL AMENDMENTS

PART 2

TRANSFER PRICING AND ADVANCE PRICING AGREEMENTS

Corporation Tax Act 2009 (c. 4)

- 147 (1) Amend section 846 (intangible fixed assets: transfers not at arm's length) as follows.
- (2) In subsection (1)(a) for “Schedule 28AA to ICTA” substitute “ Part 4 of TIOPA 2010 ”.
- (3) In subsection (1)(b) for “that Schedule” substitute “ that Part ”.
- (4) In subsection (2) for “within that Schedule” substitute “ within that Part ”.
- (5) For subsection (2)(a) substitute—
- “(a) the condition in section 147(1)(a) of TIOPA 2010 is met,
(aa) the participation condition is met (see subsection (2A)), and”.
- (6) After subsection (2) insert—
- “(2A) Section 148 of TIOPA 2010 (when the participation condition is met) applies for the purposes of subsection (2)(aa) as it applies for the purposes of section 147(1)(b) of TIOPA 2010.”
- (7) In subsection (3) for the words after “meaning” substitute “ as in that Part (see, respectively, sections 149 and 151 of TIOPA 2010) ”.

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