



Finance Act 2012

2012 CHAPTER 14

PART 9

MISCELLANEOUS MATTERS

International matters

218 Agreement between UK and Switzerland

- (1) Schedule 36 contains provision giving effect to—
 - (a) an agreement signed on 6 October 2011 between the United Kingdom and the Swiss Confederation on co-operation in the area of taxation, as amended by a protocol signed by them on 20 March 2012 and by a mutual agreement signed by them on 18 April 2012 implementing article XVIII of that protocol, and
 - (b) the joint declaration (concerning a tax finality payment) forming an integral part of that protocol.
- (2) Schedule 36 comes into force on the day on which the agreement of 6 October 2011 enters into force.
- (3) In section 23 of the Constitutional Reform and Governance Act 2010, after subsection (2A) insert—

“(2B) Section 20 does not apply to any treaty referred to in section 218(1) of the Finance Act 2012.”

219 Penalties: offshore income etc

In paragraph 21A of Schedule 24 to FA 2007 (classification of territories), in subparagraph (4)—

- (a) omit “and” at the end of paragraph (b), and
- (b) at the end of paragraph (c) insert—
 - “(d) the existence of any other arrangements between the UK and that territory for co-operation in the area of taxation, and

Status: This is the original version (as it was originally enacted).

- (e) the quality of any such other arrangements (in particular, the extent to which the co-operation provided for in them assists or is likely to assist in the protection of revenue raised from taxation in the UK).”

220 International military headquarters, EU forces, etc

Schedule 37 contains provision about the tax treatment of international military headquarters, EU forces, etc.