

Changes to legislation: There are currently no known outstanding effects for the Postal Services Act 2011, Cross
Heading: Transfers of property, rights and liabilities by transfer schemes. (See end of Document for details)

SCHEDULES

SCHEDULE 2 **U.K.**

TAXATION PROVISIONS RELATING TO RE-STRUCTURING ETC

Transfers of property, rights and liabilities by transfer schemes

- 3 In paragraphs 4 to 6—
- a “relevant transfer” means a transfer of any property, rights or liabilities by or under a transfer scheme under section 8, and
- “transferor” and “transferee” have the same meaning as in Schedule 1.

Commencement Information

I1 Sch. 2 para. 3 in force at 1.10.2011 by S.I. 2011/2329, art. 3

- 4 For the purposes of the Taxation of Chargeable Gains Act 1992 a disposal constituted by a relevant transfer is to be treated in relation to the transferor and transferee as made for a consideration such that no gain or loss accrues to the transferor.

Commencement Information

I2 Sch. 2 para. 4 in force at 1.10.2011 by S.I. 2011/2329, art. 3

- 5 For the purposes of Chapter 4 of Part 5 of the Corporation Tax Act 2009 (loan relationships: continuity of treatment on transfers within groups or on reorganisations) the transferor and transferee are to be treated in relation to a relevant transfer as if, for the purposes of the transfer, they were members of the same group.

Commencement Information

I3 Sch. 2 para. 5 in force at 1.10.2011 by S.I. 2011/2329, art. 3

- 6 (1) For the purposes of Part 8 of the Corporation Tax Act 2009 (intangible fixed assets) a relevant transfer of a chargeable intangible asset is to be treated as tax-neutral.
- (2) Part 4 of the Taxation (International and Other Provisions) Act 2010 (transfer pricing) does not apply in relation to a transfer to which sub-paragraph (1) applies.
- (3) For the purposes of section 882 of the Corporation Tax Act 2009 (application of Part 8 to assets created or acquired on or after 1 April 2002) assets acquired by a transferee on a relevant transfer are to be treated as if they were acquired from a person who at the time of the acquisition was a related party.

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Commencement Information

14 Sch. 2 para. 6 in force at 1.10.2011 by S.I. 2011/2329, art. 3

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