

*These notes refer to the Finance Act 2015 (c.11)  
which received Royal Assent on 26 March 2015*

# **FINANCE ACT 2015**

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## **EXPLANATORY NOTES**

### **INTRODUCTION**

#### ***Section 111: “Transaction” and “Series of Transactions”***

##### **Summary**

1. This section defines “transaction” and “series of transactions” as those terms are used in Part 1.

##### **Details of the Section**

2. Subsection (1) defines “transaction”.
3. Subsection (2) defines “series of transactions”.
4. Subsection (3) provides that none of the matters set out in subsection (4) will prevent a series of transactions from being regarded as constituting the means by which provision has been made or imposed between any two persons.
5. Subsection (4) lists at (a) to (c) the matters referred to in subsection (3).
6. Subsection (5) defines “arrangement” for the purposes of section 111.

##### **Background Note**

7. The diverted profits tax is a new charge on diverted profits. The main objective is to counteract contrived arrangements used by large groups (typically multinational enterprises) that result in the erosion of the UK tax base.