



# Taxation (Post-transition Period) Act 2020

## 2020 CHAPTER 26

### *Controlled foreign companies*

#### **9 Recovery of unlawful state aid**

Schedule 4 makes provision in connection with the charging of amounts under Part 9A of TIOPA 2010 (the CFC charge in relation to controlled foreign companies) as if one of the exemptions in Chapter 9 of that Part (exemptions for profits from qualifying loan relationships) had not applied, in order to comply with [Commission Decision \(EU\) 2019/1352](#) of 2 April 2019 on the state aid SA.44896 implemented by the United Kingdom concerning the CFC Group Financing Exemption (referred to in that Schedule as “the Commission Decision”).