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**Changes to legislation:** There are currently no known outstanding effects for the Railways Act 2005, Cross Heading: Continuity in relation to loan relationships. (See end of Document for details)

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## SCHEDULES

### SCHEDULE 10 **E+W+S**

#### TAXATION PROVISIONS RELATING TO TRANSFER SCHEMES

#### **PART 2** **E+W+S**

##### OTHER TRANSFERS UNDER SECTION 1(2) SCHEMES

###### *Continuity in relation to loan relationships*

- 18 (1) For the purposes of the application of [F<sup>1</sup>Part 5 of the Corporation Tax Act 2009] (loan relationships) in relation to a relevant transfer, the transferee and the transferor are to be treated as if, at the time of the transfer, they were members of the same group.
- (2) In sub-paragraph (1), the reference to being members of the same group must be construed in accordance with [F<sup>2</sup>section 335(6) of] that Act.

#### **Textual Amendments**

- F1** Words in Sch. 10 para. 18(1) substituted (with effect in accordance with s. 1329(1) of the amending Act) by Corporation Tax Act 2009 (c. 4), s. 1329(1), Sch. 1 para. 667(5)(a) (with Sch. 2 Pts. 1, 2)
- F2** Words in Sch. 10 para. 18(2) substituted (with effect in accordance with s. 1329(1) of the amending Act) by Corporation Tax Act 2009 (c. 4), s. 1329(1), Sch. 1 para. 667(5)(b) (with Sch. 2 Pts. 1, 2)

#### **Commencement Information**

- I1** Sch. 10 para. 18 in force at 8.6.2005 by S.I. 2005/1444, art. 2(1), Sch. 1

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