



Corporation Tax Act 2010

2010 CHAPTER 4

PART 5

GROUP RELIEF

CHAPTER 5

SUBSIDIARIES, GROUPS AND CONSORTIUMS

Arrangements for transfers of companies

154 Arrangements for transfer of member of group of companies etc

- (1) This section applies if, apart from this section, one company (“the first company”) and another company (“the second company”) would be members of the same group of companies.
- (2) For the purposes of this Part the companies are not members of the same group of companies if—
 - (a) one of the companies has surrenderable amounts for an accounting period (“the current period”), and
 - (b) arrangements within subsection (3) are in place.
- (3) Arrangements are within this subsection if they have any of the following effects [^{F1}(but see sections [^{F2}155A] and 155B)].

Effect 1

At some time during or after the current period, the first company or any successor of it—

- (a) could cease to be a member of the same group of companies as the second company, and
- (b) could become a member of the same group of companies as a third company (see subsection (4)).

Changes to legislation: Corporation Tax Act 2010, Section 154 is up to date with all changes known to be in force on or before 24 June 2024. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations. (See end of Document for details) View outstanding changes

Effect 2

At some time during or after the current period a person (other than the first or second company) has or could obtain, or persons together (other than those companies) have or could obtain, control of the first company but not of the second company.

Effect 3

At some time during or after the current period, a third company could start to carry on the whole or a part of a trade that at a time during the current period is carried on by the first company and could do so—

- (a) as the successor of the first company, or
- (b) as the successor of another company which is not a third company and which started to carry on the whole or a part of the trade during or after the current period.

- (4) A “third company” means a company that is not, apart from any arrangements within subsection (3), a member of the same group of companies as the first company.

Textual Amendments

- F1** Words in s. 154(3) inserted (with effect in accordance with art. 15 of the amending S.I.) by [The Enactment of Extra-Statutory Concessions Order 2012 \(S.I. 2012/266\)](#), arts. 1, **13(2)**
- F2** Word in s. 154(3) substituted (with effect in accordance with s. 31(4) of the amending Act) by [Finance Act 2013 \(c. 29\)](#), s. **31(2)**

Modifications etc. (not altering text)

- C1** Pt. 5 excluded (14.7.2022) by [Energy \(Oil and Gas\) Profits Levy Act 2022 \(c. 40\)](#), s. **1(5)(e)** (with ss. 15(1), 16(1))
- C2** S. 154 applied (with modifications) (with effect in accordance with Sch. 7 para. 40 of the amending Act) by 2010 c. 8, s. 259ZME(3) (as inserted by [Finance Act 2021 \(c. 26\)](#), **Sch. 7 para. 15(3)**)
- C3** S. 154 applied (1.4.2022 in relation to accounting periods beginning on or after that date) by [Finance Act 2022 \(c. 3\)](#), s. 51(1), **Sch. 7 para. 11**
- C4** S. 154 applied (with modifications) (14.7.2022) by [Energy \(Oil and Gas\) Profits Levy Act 2022 \(c. 40\)](#), **Sch. 1 para. 12** (with ss. 15(1), 16(1), 17)

Changes to legislation:

Corporation Tax Act 2010, Section 154 is up to date with all changes known to be in force on or before 24 June 2024. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations.

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Changes and effects yet to be applied to the whole Act associated Parts and Chapters:

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- s. 357CHA omitted by [2024 c. 3 Sch. 2 para. 14\(7\)](#)
- s. 658(1)(d)(e) inserted by [2010 c. 13 Sch. 6 para. 31](#) (This amendment not applied to [legislation.gov.uk](#). Sch. 6 para. 31 omitted (retrospective to 6.4.2010) by virtue of Finance Act 2012 (c. 14), s. 52(2) (3))