



# Corporation Tax Act 2010

## 2010 CHAPTER 4

### PART 14

#### CHANGE IN COMPANY OWNERSHIP

### CHAPTER 7

#### MEANING OF “CHANGE IN THE OWNERSHIP OF A COMPANY”

#### *Supplementary provision*

#### **725 Provision applying for the purposes of Chapters 2 to [F15A]**

- (1) This section applies for the purposes of Chapters 2 to [F25A] .
- (2) If any of those Chapters has operated to restrict relief by reference to a change in the ownership of a company taking place at any time, no transaction or circumstances before that time may be taken into account in determining whether there is any subsequent change in the ownership of the company.
- (3) The following provisions apply if—
  - (a) any relevant assets are taken into account in determining that there has been a change in the ownership of a company, and
  - (b) the relevant assets were acquired—
    - (i) in pursuance of a contract of sale or option or other contract, or
    - (ii) by a person holding such a contract.
- (4) The time when the change in the ownership of the company took place is to be determined as if the acquisition had been made—
  - (a) when the contract was made with the holder, or
  - (b) when the benefit of it was assigned to the holder.

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**Status:** Point in time view as at 17/07/2013.

**Changes to legislation:** Corporation Tax Act 2010, Section 725 is up to date with all changes known to be in force on or before 18 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)

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- (5) Accordingly, a person exercising an option to purchase shares is treated as having purchased the shares when that person acquired the option.
- (6) In this section “relevant assets” means—
- (a) ordinary share capital, or
  - (b) any property or rights which under section 721 or 722 may be taken into account instead of ordinary share capital.

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#### **Textual Amendments**

- F1** Word in s. 725 heading substituted (with effect in accordance with Sch. 13 para. 3 of the amending Act) by [Finance Act 2013 \(c. 29\)](#), **Sch. 13 para. 1(5)(a)**
- F2** Word in s. 725(1) substituted (with effect in accordance with Sch. 13 para. 3 of the amending Act) by [Finance Act 2013 \(c. 29\)](#), **Sch. 13 para. 1(5)(b)**

**Status:**

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