



# Taxation (International and Other Provisions) Act 2010

## 2010 CHAPTER 8

### PART 2

#### DOUBLE TAXATION RELIEF

#### CHAPTER 1

##### DOUBLE TAXATION ARRANGEMENTS AND UNILATERAL RELIEF ARRANGEMENTS

##### *Unilateral relief arrangements*

#### **13 Rule 5: credit for tax charged directly on dividend**

- (1) This section applies for the purposes of section 12(1).
- (2) Credit under section 9 for overseas tax on a dividend paid by a company (“P”) resident in the territory is allowed if—
  - (a) the overseas tax is charged directly on the dividend (whether by charge to tax, deduction of tax at source or otherwise), and
  - (b) neither P nor the recipient of the dividend would have borne any of that tax if the dividend had not been paid.

**Changes to legislation:**

There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Section 13.