



Taxation (International and Other Provisions) Act 2010

2010 CHAPTER 8

PART 4

TRANSFER PRICING

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POSITION, IF ONLY ONE AFFECTED PERSON POTENTIALLY ADVANTAGED, OF OTHER AFFECTED PERSON

Alternative way of claiming if a security is involved

181 Section 182 applies to claims where actual provision relates to a security

- (1) Subsection (2) applies if—
 - (a) both of the affected persons are companies, and
 - (b) the actual provision is provision in relation to a security issued by one of those companies.
- (2) A claim under section 174 may be made in accordance with section 182.
- (3) For the purposes of this Part, a “section 182 claim” is a claim under section 174 made in accordance with section 182.
- (4) In subsections (1)(b) and (5)(a) “security” includes securities not creating or evidencing a charge on assets.
- (5) For the purposes of subsection (1)(b), any—
 - (a) interest payable by a company on money advanced without the issue of a security for the advance, or
 - (b) other consideration given by a company for the use of money so advanced,

Changes to legislation: *There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Section 181. (See end of Document for details)*

is to be treated as if payable or given in respect of a security issued for the advance by the company, and references to a security are to be read accordingly.

Changes to legislation:

There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Section 181.