



# Taxation (International and Other Provisions) Act 2010

## 2010 CHAPTER 8

### PART 4

#### TRANSFER PRICING

### CHAPTER 5

#### POSITION OF GUARANTOR OF AFFECTED PERSON'S LIABILITIES UNDER A SECURITY ISSUED BY THE PERSON

#### **194 Claims under section 192(1): general provisions**

- (1) A claim under section 192(1) may be made—
  - (a) by the guarantor company,
  - (b) if there are two or more guarantor companies, by those companies acting together, or
  - (c) by the issuing company.
- (2) A claim made under section 192(1) by the issuing company is to be taken to be made on behalf of the guarantor company or companies.
- (3) Sections 175 to 177 apply in relation to a claim under section 192(1) made by or on behalf of any person or persons as they apply in relation to a claim under section 174 made by the disadvantaged person, but taking—
  - (a) references in sections 176 and 177 to the advantaged person as references to the issuing company, and
  - (b) the reference in section 177 to the disadvantaged person as a reference to the guarantor company or companies.