



Taxation (International and Other Provisions) Act 2010

2010 CHAPTER 8

PART 2

DOUBLE TAXATION RELIEF

CHAPTER 2

DOUBLE TAXATION RELIEF BY WAY OF CREDIT

Limits on credit: general rules

34 Reduction in credit: payment by reference to foreign tax

- (1) Subsection (2) applies if—
 - (a) credit for foreign tax is to be allowed to a person (“P”) under the arrangements, and
 - (b) a payment is made by a tax authority to P, or any person connected with P, by reference to the foreign tax.
- (2) The amount of that credit is to be reduced by an amount equal to that payment.
- (3) Whether a person is connected with P is determined in accordance with section 1122 of CTA 2010.