

SCHEDULES

SCHEDULE 21

PENALTIES IN CONNECTION WITH OFFSHORE ASSET MOVES

Amount of the penalty

- 6 (1) The penalty payable under paragraph 1(1) is 50% of the amount of the original penalty payable by P.
- (2) The penalty payable under paragraph 1(1) is not a penalty determined by reference to a liability to tax (despite the fact that the original penalty by reference to which it is calculated may be such a penalty).