Changes to legislation: There are currently no known outstanding effects for the Finance Act 2021, Paragraph 29. (See end of Document for details)

# SCHEDULES

#### SCHEDULE 7

# HYBRID AND OTHER MISMATCHES

### **PART 11**

#### EXEMPT INVESTORS IN HYBRID ENTITIES

29 After section 259ND insert—

"Qualifying institutional investors etc

## 259NDA Meaning of "qualifying institutional investor" etc

- (1) This section has effect for the purposes of this Part.
- (2) References to "qualifying institutional investor" have the meaning given by paragraph 30A of Schedule 7AC to TCGA 1992.
- (3) A qualifying institutional investor is "based" in a territory—
  - (a) if it is resident for tax purposes in the territory, or
  - (b) where it is not resident anywhere for tax purposes, if it is established in the territory."

# **Changes to legislation:**

There are currently no known outstanding effects for the Finance Act 2021, Paragraph 29.