

## SCHEDULE 1

### AMENDMENTS TO TCGA 1992

2. In section 116(8A)(1) (reorganisations, conversions and reconstructions) at the end insert—  
“This subsection does not apply in relation to a transaction to which paragraph 12G of Schedule 9 to the Finance Act 1996 (c. 8) (exchanges etc: treatment of loan relationships) applies.”.

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(1) Section 116(8A) was inserted by paragraph 60(3) of Schedule 14 to the Finance Act 1996 and was amended by paragraph 8 of Schedule 6 to the Finance (No. 2) Act 2005 (c.22).