



Corporation Tax Act 2010

2010 CHAPTER 4

[^{F1}PART 8ZB

TRANSACTIONS IN UK LAND

Other supplementary provisions

[^{F1}356O ~~M~~ racing value

- (1) This section applies if it is necessary to determine the extent to which the value of any property or right is derived from any other property or right for the purposes of this Part.
- (2) Value may be traced through any number of companies, partnerships, trusts and other entities or arrangements.
- (3) The property held by a company, partnership or trust must be attributed to the shareholders, partners, beneficiaries or other participants at each stage in whatever way is appropriate in the circumstances.
- (4) In this section—
 - “partnership” includes an entity established under the law of a country or territory outside the United Kingdom of a similar nature to a partnership; and
 - “partners”, in relation to such arrangements, is to be construed accordingly;
 - “trust” includes arrangements—
 - (a) which have effect under the law of a country or territory outside the United Kingdom; and
 - (b) under which persons acting in a fiduciary capacity hold and administer property on behalf of other persons,

and “beneficiaries”, in relation to such arrangements, is to be construed accordingly.]

Status: Point in time view as at 16/11/2017.

Changes to legislation: There are outstanding changes not yet made by the legislation.gov.uk editorial team to Corporation Tax Act 2010. Any changes that have already been made by the team appear in the content and are referenced with annotations. (See end of Document for details)

Textual Amendments

- F1** Pt. 8ZB inserted (with effect in accordance with s. 81 of the amending Act and also with effect in accordance with [Finance \(No. 2\) Act 2017 \(c. 32\)](#), s. 39(1)(2)) by [Finance Act 2016 \(c. 24\)](#), [s. 77\(1\)](#)

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