



Corporation Tax Act 2010

2010 CHAPTER 4

PART 22

MISCELLANEOUS PROVISIONS

CHAPTER 1

TRANSFERS OF TRADE WITHOUT A CHANGE OF OWNERSHIP

Supplementary

953 Application of Chapter to further transfers of a trade

- (1) This section applies if—
 - (a) there is a transfer of a trade (“the original transfer”) that meets the ownership condition and the tax condition (see sections 941 and 943),
 - (b) after the original transfer there was a further transfer of the trade from the successor in relation to the original transfer to a third company (“the further transfer”),
 - (c) the further transfer took place at any time before the end of the period specified in subsection (7),
 - (d) the ownership condition was met in relation to the original transfer only on or after the further transfer, and
 - (e) apart from this section, this Chapter would not apply to the further transfer.
- (2) This Chapter applies to the further transfer as well as to the original transfer.
- (3) In the application of this Chapter to the further transfer—
 - (a) the successor in relation to the original transfer is taken to be the predecessor in relation to the further transfer, and
 - (b) the third company is taken to be the successor in relation to the further transfer.

Status: This is the original version (as it was originally enacted).

- (4) In the application of sections 944 to 950 in relation to the original transfer, references to the successor include references to the successor in relation to the further transfer.
- (5) In the application of those sections in relation to the further transfer, references to the predecessor include references to the predecessor in relation to the original transfer.
- (6) If, at a time before the end of the period specified in subsection (7), the transferred trade was transferred from the successor in relation to the further transfer to another company, subsections (2) to (5) and this subsection apply again in a like manner (and so on).
- (7) The period referred to above is the period—
 - (a) beginning at the time when the original transfer takes place, and
 - (b) ending immediately after the earliest time when the ownership condition was met in respect of the original transfer (see section 941(1)).