TAXATION (INTERNATIONAL AND OTHER PROVISIONS) ACT 2010

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Schedule 6: UK representatives of non-UK residents

Part 1: New Chapters 2B and 2C of Part 14 of ITA 2007

Chapter 2B: UK representative of non-UK resident

Section 835J: Persons acting under alternative finance arrangements

1211. This section provides that, if a non-UK resident is party to certain alternative finance arrangements, neither the counter-party to the arrangements nor any other person acting for the non-UK resident in relation to the arrangements is the UK representative in respect of amounts within section 835E(2) which consist of the non-UK resident's alternative finance return. It is based on section 127(1) of FA 1995.