

*These notes refer to the Taxation (International and Other Provisions)
Act 2010 (c.8) which received Royal Assent on 18 March 2010*

TAXATION (INTERNATIONAL AND OTHER PROVISIONS) ACT 2010

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Part 2: Double taxation relief

Chapter 1: Double taxation arrangements and unilateral relief arrangements

Section 10: Rule 2: accrued income profits

51. This section gives credit relief in certain cases involving accrued income profits. It is based on sections 790(5), 793A(2) and (3) and 807(1) and (5) of ICTA.
52. Although this relief is not so termed in the source legislation, it is unilateral relief and is therefore rewritten in this group of sections.