



Finance Act 2012

2012 CHAPTER 14

PART 1

INCOME TAX, CORPORATION TAX AND CAPITAL GAINS TAX

CHAPTER 3

CORPORATION TAX: GENERAL

Miscellaneous

32 Group relief: meaning of “normal commercial loan”

- (1) CTA 2010 is amended as follows.
- (2) In section 162(2)(c) (meaning of “normal commercial loan”), after “securities in” insert “a quoted unconnected company (see section 164(2A)) or in”.
- (3) In section 164 (sections 160 and 162: supplementary), in subsection (2)(c), after “securities in” insert “a quoted unconnected company (see subsection (2A)) or in”.
- (4) After subsection (2) of that section insert—
 - “(2A) For the purposes of this section and section 162 a company is a quoted unconnected company if (and only if)—
 - (a) its ordinary shares are listed on a recognised stock exchange, and
 - (b) it is not connected with the relevant company.”
- (5) In subsection (4) of that section—
 - (a) for “If the candidate company’s” substitute “In the case of a company whose”, and
 - (b) for “subsection (3)(c) is” substitute “subsections (2A)(a) and (3)(c) are”.
- (6) In subsection (5) of that section, for “subsections (3) and (4)” substitute “this section”.

- (7) The amendments made by this section have effect in relation to loans made on or after 21 March 2012.