

*These notes refer to the Finance Act 2015 (c.11)  
which received Royal Assent on 26 March 2015*

# **FINANCE ACT 2015**

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## **EXPLANATORY NOTES**

### **INTRODUCTION**

#### ***Section 86: Non-Uk Company Avoiding a Uk Taxable Presence***

##### **Summary**

1. This section sets out the third of the three rules that can give rise to a charge on taxable diverted profits. In particular, it identifies arrangements designed to avoid the existence of a UK permanent establishment.