



# Finance Act 2020

## 2020 CHAPTER 14

### PART 2

#### DIGITAL SERVICES TAX

##### *Groups, parents and members*

#### **60 Treatment of stapled entities**

- (1) This section applies where two or more entities—
  - (a) would, apart from this section, be the parent of a group, and
  - (b) are stapled to each other.
- (2) This Part applies as if—
  - (a) the entities were subsidiaries of another entity (the “deemed parent”), and
  - (b) the deemed parent were within section 57(1)(a) (conditions for being the parent of a group).
- (3) For the purpose of this section, an entity (A) is “stapled” to another entity (B) if, in consequence of the nature of the rights attaching to the shares or other interests in A (including any terms or conditions attaching to the right to transfer the interests), it is necessary or advantageous for a person who has, disposes of or acquires shares or other interests in A also to have, dispose of or acquire shares or other interests in B.