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SCHEDULES

SCHEDULE 12

PILLAR TWO

PART 4

MINOR AND TECHNICAL CHANGES

Schedules 14 to 17

- 58 (1) In Schedule 14 (administration)—
- (a) in paragraph 6 (registration), after sub-paragraph (1) insert—
 - “(1A) The reference to a multinational group in sub-paragraph (1) does not include a group exclusively comprised of excluded entities (who are only regarded as members of the group for certain purposes in accordance with section 127(2)).”
 - (b) in paragraph 34 (group payment notices)—
 - (i) in sub-paragraph (2), for “the time the liability to tax arose” substitute “any time in the accounting period to which the amount payable relates”,
 - (ii) after that sub-paragraph insert—
 - “(2A) The references to a member of a group in sub-paragraph (2) do not include a member of a group that is—
 - (a) a securitisation company (within the meaning given by section 267(4)),
 - (b) a covered bond vehicle (within the meaning given by [section 272A\(5\)](#)), or
 - (c) an investment entity.”,
 - (c) in paragraph 35(1), for “ring-fenced entity”, in the second place it occurs, substitute “member of a ring-fenced body sub-group that the entity is a member of”,
 - (d) in paragraph 36(3), for the words from “person” to the end substitute “recipient is not a person to whom the notice can be given (see paragraphs 34(2) and (2A) and 35(1)).”, and
 - (e) in paragraph 37—
 - (i) in sub-paragraph (4)(b), after “for” insert “income tax or”, and
 - (ii) in sub-paragraph (6), for “payer” substitute “payee”.
- (2) In Schedule 15 (elections)—
- (a) in paragraph 1(1), after paragraph (a) insert—

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- “(aa) section 141(7);”, and
- (b) in paragraph 2(1)—
- (i) after paragraph (e) insert—
- “(ea) section 199;”, and
- (ii) after paragraph (f) insert—
- “(fa) section 216;”.
- (3) In Schedule 16 (multinational top-up tax: transitional provision), in paragraph 10—
- (a) the existing words become sub-paragraph (1),
- (b) in the words before paragraph (a) of that sub-paragraph—
- (i) for “section 226” substitute “section 227”, and
- (ii) after “groups” insert “, that Chapter has effect as if”,
- (c) in paragraph (a) of that sub-paragraph, for “3(2)(c)” substitute “3(2)(b)”, and
- (d) after that sub-paragraph insert—
- “(2) For that purpose ignore section 227(1)(a) (reference to ultimate parent treated as reference to joint venture parent).
- (3) Accordingly, the filing member of a multinational group may make a separate transitional safe harbour election in respect of joint venture members of a joint venture group in a territory.”
- (4) In Schedule 17 (index of defined expressions), in the table—
- (a) in the definition of “government entity”, for “government” substitute “governmental”,
- (b) in the definition of “pensions services entity” for “pensions” substitute “pension”, and
- (c) at the appropriate places insert—

“CFS currency	section 254(1)”;
“country-by-country report	section 251A ”;
“covered bond vehicle	section 272A(5) ”;
“domestic purposes (in Part 4)	section 272(1)”;
“domestic entity purposes (in Part 4)	section 273(1)”;
“securitisation company	section 267(4)”;
“tax equity partnership arrangement	section 176D(5) ”;
“transitional safe harbour election	section 255(6)”.

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Changes and effects yet to be applied to the whole Act associated Parts and Chapters:

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- Sch. 9 para. 132(1) Sch. 9 para. 132 renumbered as Sch. 9 para. 132(1) by [S.I. 2024/356 reg. 4\(23\)\(a\)](#)
- Sch. 9 para. 125(1)(c) and word inserted by [S.I. 2024/356 reg. 4\(3\)\(b\)](#)
- Sch. 9 para. 125(3A) inserted by [S.I. 2024/356 reg. 4\(6\)](#)
- Sch. 9 para. 126(1)(c) inserted by [S.I. 2024/356 reg. 4\(9\)\(c\)](#)
- Sch. 9 para. 126(3A) inserted by [S.I. 2024/356 reg. 4\(10\)](#)
- Sch. 9 para. 127A and cross-heading inserted by [S.I. 2024/356 reg. 4\(12\)](#)
- Sch. 9 para. 128(6)(a)(zi) inserted by [S.I. 2024/356 reg. 4\(13\)](#)
- Sch. 9 para. 129(1)(c)(d) inserted by [S.I. 2024/356 reg. 4\(15\)\(b\)](#)
- Sch. 9 para. 129(2)(c) and word inserted by [S.I. 2024/356 reg. 4\(16\)\(b\)](#)
- Sch. 9 para. 130A and cross-heading inserted by [S.I. 2024/356 reg. 4\(21\)](#)
- Sch. 9 para. 132(2)-(5) inserted by [S.I. 2024/356 reg. 4\(23\)\(c\)](#)
- Sch. 9 para. 132A and cross-heading inserted by [S.I. 2024/356 reg. 4\(24\)](#)
- Sch. 9 para. 132(1) words inserted by [S.I. 2024/356 reg. 4\(23\)\(b\)](#)