

## SCHEDULE 2

### AMENDMENTS TO FA 1996

**10.**—(1) Paragraph 12I (double taxation relief on European cross-border merger) is amended as follows.

(2) In sub-paragraph (1)(a) for “to which paragraph 12B(1) applies” substitute “mentioned in paragraph 12B(1)”.

(3) In sub-paragraph (2)—

(a) in paragraph (a) for “12B(3) and 12G(6) shall not apply” substitute “12B and 12G shall not apply in relation to the transfer”, and

(b) in paragraph (b) for “12G(6)” substitute “12G”.

(4) In sub-paragraph (4) after “transfer of assets” insert “or liabilities representing a loan relationship”.

(5) In sub-paragraph (5)(a) after “transfer”, in each place, insert “of those assets or liabilities”.