
STATUTORY INSTRUMENTS

2017 No. 1271

The Risk Transformation (Tax) Regulations 2017

Removal of special tax treatment

6.—(1) If condition A (set out in regulation 7) or B (set out in regulation 8) is met, regulations 4 and 5 do not apply in relation to profits arising or payments made in the accounting period in which the condition is met, or treated as met, or in any subsequent accounting period.

(2) If the qualifying transformer vehicle is a protected cell company, where condition B is met, paragraph (1) only applies in relation to profits of, and payments by, the cell in relation to which the condition is met.