

SCHEDULE 8

TRUSTS

Relevant trustees: appeals and reviews

- 10 (1) The agreement of all the relevant trustees is required if a settlement agreement relating to the transaction is to be entered into under section 184 of TCMA.
- (2) A notice of request under section 173 of TCMA may be given by any of the relevant trustees.
- (3) Where WRA undertakes a review of an appealable decision relating to the transaction following such a request made by some (but not all) of the relevant trustees—
- (a) notice of the review must be issued by WRA to each of the other relevant trustees whose identity is known to WRA;
 - (b) any of the other relevant trustees may be a party to the review if they notify WRA in writing;
 - (c) notice of WRA's conclusions under section 176(5), (6) or (7) of TCMA must be issued to each of the relevant trustees whose identity is known to WRA;
 - (d) section 177 of TCMA (effect of conclusions of review) applies in relation to all of the relevant trustees.
- (4) In the case of an appeal under Part 8 of TCMA relating to the transaction—
- (a) the appeal may be brought by any of the relevant trustees;
 - (b) notice of the appeal must be issued by WRA to each of the relevant trustees who are not bringing the appeal and whose identity is known to WRA;
 - (c) any of the relevant trustees are entitled to be parties to the appeal;
 - (d) the tribunal's determination under section 181 of TCMA binds all the relevant trustees.