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SCHEDULES

[F1SCHEDULE 3ZB

[F2CT EXIT CHARGE PAYMENT PLANS]

Textual Amendments

F1 Sch. 3ZB inserted (with effect in accordance with Sch. 49 para. 8 of the amending Act) by Finance Act 2013 (c. 29), **Sch. 49 para. 6**

F2 Words in Sch. 3ZB substituted (12.2.2019) by Finance Act 2019 (c. 1), **Sch. 7 para. 6(1)(c)**

PART 1

COMPANY CEASING TO BE RESIDENT IN UK

Circumstances in which [F3CT exit charge payment plan] may be entered into

Textual Amendments

F3 Words in Sch. 3ZB substituted (12.2.2019) by Finance Act 2019 (c. 1), **Sch. 7 para. 6(1)(b)**

1 (1) This Part of this Schedule and Part 3 of this Schedule apply where an eligible company—

(a) ceases to be resident in the United Kingdom,

(b) on ceasing to be so resident, becomes resident in [F4a relevant]EEA state, and

(c) is liable to pay qualifying corporation tax in respect of the migration accounting period.

(2) The company may defer payment of some or all of the qualifying corporation tax if it enters into [F5a CT exit charge payment plan] in respect of it in accordance with this Schedule.

(3) The company may enter into [F5a CT exit charge payment plan] only if conditions A to C are met.

(4) Condition A is that before the end of the period of 9 months beginning immediately after the migration accounting period—

(a) an application to enter into the [F3CT exit charge payment plan] is made to Her Majesty's Revenue and Customs, and

(b) the application contains details of all the matters which are required by Part 3 of this Schedule to be specified in the plan.

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(5) Condition B is that on ceasing to be resident in the United Kingdom, the company carries on a business in **[**[F6]a relevant**]**EEA state.

(6) Condition C is that, on becoming resident in the **[**[F7]relevant**]**EEA state, the company is not treated as resident in a territory outside the European Economic Area for the purposes of any double taxation arrangements.

(7) In this paragraph—

"double taxation arrangements" means arrangements which are made by two or more territories with a view to affording relief from double taxation and which have effect at the time when the company ceases to be resident in the United Kingdom;

"eligible company" means a company that has a right to freedom of establishment protected by Article 49 of the Treaty on the functioning of the European Union or established by Article 31 of the Agreement on the European Economic Area;

[[F8]"relevant EEA state" means an EEA state that is—

(a) a member of the European Union, or

(b) a party to an agreement with the United Kingdom that provides for mutual assistance equivalent to that provided for by Council Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes.**]**

(8) In this Part of this Schedule—

(a) references to the migration accounting period are to—

(i) in a case where an accounting period comes to an end on the company ceasing to be resident in the United Kingdom, that accounting period, and

(ii) in a case not falling within sub-paragraph (i), the accounting period during which the company ceases to be resident in the United Kingdom,

(b) references to a Part 1 company are to a company in relation to which this Part of this Schedule applies, and

(c) references to Part 3 of this Schedule are to Part 3 of this Schedule as it applies to a Part 1 company.

Textual Amendments

F4 Words in Sch. 3ZB para. 1(1)(b) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 2(a)**

F5 Words in Sch. 3ZB substituted (12.2.2019) by Finance Act 2019 (c. 1), **Sch. 7 para. 6(1)(a)**

F6 Words in Sch. 3ZB para. 1(5) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 2(b)**

F7 Word in Sch. 3ZB para. 1(6) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 2(c)**

F8 Words in Sch. 3ZB para. 1(7) inserted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 2(d)**

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Qualifying corporation tax

2 (1) The company is liable to pay qualifying corporation tax in respect of the migration accounting period if CT1 is greater than CT2 where—

CT1 is the corporation tax which the company is liable to pay for the accounting period, and

CT2 is the corporation tax which the company would be liable to pay for the accounting period if any income, profits, gains, losses or debits arising only by virtue of the exit charge provisions were ignored,

(CT2 will be zero if the company would not be liable to pay any corporation tax for the period).

(2) The amount of qualifying corporation tax which the company is liable to pay is the difference between CT1 and CT2.

(3) "Exit charge provisions" means—

(a) section 185 of the 1992 Act,

F9(b) . . . . . .

(c) section 162 of CTA 2009, where that section applies by virtue of section 41(2)(b) of that Act,

(d) section 333 of that Act,

(e) section 609 of that Act, **[**F10and**]**

(f) section 859 of that Act, where that section applies by virtue of section 859(2)(a), F11...

F11(g) . . . . . .

(4) References in this Part of this Schedule and Part 3 of this Schedule to qualifying corporation tax are to be read in accordance with this paragraph.

Textual Amendments

F9 Sch. 3ZB para. 2(3)(b) omitted (with effect in accordance with Sch. 8 para. 9(5) of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 9(4)(a)**

F10 Word in Sch. 3ZB para. 2(3)(e) inserted (with effect in accordance with Sch. 8 para. 10(5) of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 10(4)(a)(i)**

F11 Sch. 3ZB para. 2(3)(g) and preceding word omitted (with effect in accordance with Sch. 8 para. 10(5) of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 10(4)(a)(ii)**

Interpretation: exit charge assets and liabilities

3 (1) This paragraph applies for the purposes of this Part of this Schedule and Part 3 of this Schedule.

(2) "Exit charge assets" and "exit charge liabilities" means assets or liabilities (as the case may be) in respect of which income, profits or gains arise in the migration accounting period by virtue of the exit charge provisions, and in particular—

(a) "TCGA or trading stock exit charge assets" means those exit charge assets, other than pre-FA 2002 intangible fixed assets, in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 2(3)(a) F12... or (c),

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(b) "financial exit charge assets or liabilities" means those exit charge assets or liabilities in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 2(3)(d) or (e),

(c) "intangible exit charge assets" means—

(i) those exit charge assets in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 2(3)(f) [F13]... , and

(ii) those exit charge assets which are pre-FA 2002 intangible fixed assets in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 2(3)(a) [F14]... .

(3) In sub-paragraph (2)—

(a) "exit charge provisions" has the meaning given in paragraph 2(3);

(b) "pre-FA 2002 intangible fixed asset" means an intangible fixed asset which is a pre-FA 2002 asset (as defined in section 881 of CTA 2009).

Textual Amendments

F12 Word in Sch. 3ZB para. 3(2)(a) omitted (with effect in accordance with Sch. 8 para. 9(5) of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 9(4)(b)(i)**

F13 Words in Sch. 3ZB para. 3(2)(c)(i) omitted (with effect in accordance with Sch. 8 para. 10(5) of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 10(4)(b)**

F14 Words in Sch. 3ZB para. 3(2)(c)(ii) omitted (with effect in accordance with Sch. 8 para. 9(5) of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 9(4)(b)(ii)**

PART 2

NON-UK RESIDENT COMPANIES WITH UK PERMANENT ESTABLISHMENTS

*Circumstances in which **[**[F3]CT exit charge payment plan**]** may be entered into*

4 (1) This Part of this Schedule and Part 3 of this Schedule apply where—

(a) at any time during an accounting period ("the migration accounting period") an eligible company which is not resident in the United Kingdom carries on a trade in the United Kingdom through a permanent establishment there,

(b) one or more PE qualifying events occurs in respect of any assets or liabilities of the company as mentioned in sub-paragraph (4), and

(c) the company is liable to pay qualifying corporation tax in respect of the migration accounting period.

(2) The company may defer payment of some or all of the qualifying corporation tax if it enters into **[**[F5]a CT exit charge payment plan**]** in respect of it in accordance with this Schedule.

(3) The company may enter into **[**[F5]a CT exit charge payment plan**]** only if before the end of the period of 9 months beginning immediately after the migration accounting period—

(a) an application to enter into the **[**[F3]CT exit charge payment plan**]** is made to Her Majesty's Revenue and Customs, and

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(b) the application contains details of all the matters which are required by Part 3 of this Schedule to be specified in the plan.

(4) For the purposes of this Part of this Schedule, a "PE qualifying event" occurs in respect of an asset or liability of a company if—

(a) an event occurs which triggers—

(i) a deemed disposal and reacquisition of the asset or liability under the exit charge provision mentioned in paragraph 5(3)(a), (c), (d) or (e), or

(ii) a valuation of the asset under the exit charge provision mentioned in paragraph 5(3)(b),

(b) the event—

(i) occurs during the migration accounting period, or

(ii) causes the migration accounting period to come to an end, [F15]...

(c) at the time of the event, the company is not treated as resident in a territory outside the European Economic Area for the purposes of any double taxation arrangements**[**[F16], and

(d) immediately after the event—

(i) the asset or liability is held or owed by the company for the purposes of a permanent establishment of the company in a relevant EEA state, or

(ii) the asset or liability is held or owed by the company otherwise than for the purposes of a permanent establishment of the company and the company is resident in a relevant EEA state**]**.

(5) In this Part of this Schedule, references to a PE qualifying asset or liability are to an asset or liability in respect of which a PE qualifying event occurs.

(6) In this paragraph "double taxation arrangements"**[**[F17]**,]** "eligible company" **[**[F18]and "relevant EEA state"**]** have the meanings given in paragraph 1(7).

(7) In this Part of this Schedule—

(a) references to the migration accounting period are to be read in accordance with this paragraph;

(b) references to a Part 2 company are to a company in relation to which this Part of this Schedule applies,

(c) references to Part 3 of this Schedule are to Part 3 of this Schedule as it applies to a Part 2 company, and

(d) "permanent establishment", in relation to a company, is to be read in accordance with Chapter 2 of Part 24 of CTA 2010.

Textual Amendments

F5 Words in Sch. 3ZB substituted (12.2.2019) by Finance Act 2019 (c. 1), **Sch. 7 para. 6(1)(a)**

F15 Word in Sch. 3ZB para. 4(4)(b) omitted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 3(2)(a)**

F16 Sch. 3ZB para. 4(4)(d) and preceding word inserted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 3(2)(b)**

F17 Comma in Sch. 3ZB para. 4(6) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 3(3)(a)**

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F18 Words in Sch. 3ZB para. 4(6) inserted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 3(3)(b)**

Qualifying corporation tax

5 (1) The company is liable to pay qualifying corporation tax in respect of the migration accounting period if CT1 is greater than CT2 where—

CT1 is the corporation tax which the company is liable to pay for the accounting period, and

CT2 is the corporation tax which the company would be liable to pay for the accounting period if any income, profits, gains, losses or debits arising as a result of any PE qualifying events, and arising only by virtue of the exit charge provisions, were ignored,

(CT2 will be zero if the company would not be liable to pay any corporation tax for the period).

(2) The amount of qualifying corporation tax which the company is liable to pay is the difference between CT1 and CT2.

(3) Exit charge provisions means—

(a) section 25 of the 1992 Act,

(b) section 162 of CTA 2009, where that section applies by virtue of section 41(2)(b) of that Act,

(c) section 334 of that Act,

(d) section 610 of that Act, and

(e) section 859 of that Act, where that section applies by virtue of section 859(2)(b).

(4) References in this Part of this Schedule and Part 3 of this Schedule to qualifying corporation tax are to be read in accordance with this paragraph.

Interpretation: exit charge assets and liabilities

6 (1) This paragraph applies for the purposes of this Part of this Schedule and Part 3 of this Schedule.

(2) "Exit charge assets" and "exit charge liabilities" means any PE qualifying assets or liabilities (as the case may be) in respect of which income, profits or gains arise in the migration accounting period by virtue of the exit charge provisions, and in particular—

(a) "TCGA or trading stock exit charge assets" means those exit charge assets, other than pre-FA 2002 intangible fixed assets, in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 5(3)(a) or (b);

(b) "financial exit charge assets or liabilities" means those exit charge assets or liabilities in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 5(3)(c) or (d);

(c) "intangible exit charge assets" means—

(i) those exit charge assets in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 5(3)(e), and

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(ii) those exit charge assets which are pre-FA 2002 intangible fixed assets in respect of which income, profits or gains arise by virtue of the exit charge provision mentioned in paragraph 5(3)(a).

(3) In sub-paragraph (2)—

(a) "exit charge provisions" has the meaning given in paragraph 5(3);

(b) "pre-FA 2002 intangible fixed asset" means an intangible fixed asset which is a pre-FA 2002 asset (as defined in section 881 of CTA 2009).

PART 3

ENTERING INTO **[**F5A CT EXIT CHARGE PAYMENT PLAN**]**

Introduction

7 (1) As to when this Part of this Schedule applies, see—

(a) Part 1 of this Schedule (companies ceasing to be resident in the United Kingdom), and

(b) Part 2 of this Schedule (companies with permanent establishments in the United Kingdom).

(2) In this Part of this Schedule, as it applies to a company in relation to which Part 1 of this Schedule applies, terms and expressions which are used in this Part and in that Part have the same meanings in this Part as in that Part.

(3) In this Part of this Schedule, as it applies to a company in relation to which Part 2 of this Schedule applies, terms and expressions which are used in this Part and in that Part have the same meanings in this Part as in that Part.

*Entering into **[**F5a CT exit charge payment plan**]***

8 (1) A Part 1 company or a Part 2 company enters into **[**F5a CT exit charge payment plan**]** in respect of qualifying corporation tax in accordance with this Schedule if—

(a) the company agrees to pay, and an officer of Revenue and Customs agrees to accept payment of, the tax in accordance with **[**F19paragraphs 11 to 14**]**,

(b) the company agrees to pay interest on the tax in accordance with paragraph 9(3), and

(c) the plan meets the requirements set out in **[**F20paragraph 10**]** as to the matters that must be specified in it.

(2) The **[**F3CT exit charge payment plan**]** may, in the circumstances mentioned in sub-paragraph (3), contain appropriate provision regarding security for Her Majesty's Revenue and Customs in respect of the deferred payment of the tax.

(3) Those circumstances are where an officer of Her Majesty's Revenue and Customs considers that agreeing to accept payment of qualifying corporation tax in accordance with the plan would present a serious risk as to collection of the tax in the absence of provision regarding security in respect of that tax.

(4) **[**F5A CT exit charge payment plan**]** is void if any information furnished by the company in connection with the plan does not fully and accurately disclose all facts

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and considerations material to the decision of the officer of Revenue and Customs to accept payment of qualifying corporation tax in accordance with the plan.

Textual Amendments

F3 Words in Sch. 3ZB substituted (12.2.2019) by Finance Act 2019 (c. 1), **Sch. 7 para. 6(1)(b)**

F19 Words in Sch. 3ZB para. 8(1)(a) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 4(a)**

F20 Words in Sch. 3ZB para. 8(1)(c) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 4(b)**

Effect of [F3 CT exit charge payment plan]

9 (1) This paragraph applies where **[**F5a CT exit charge payment plan**]** is entered into by a company in respect of qualifying corporation tax in accordance with this Schedule.

(2) As regards when the tax is payable—

(a) the plan does not prevent the tax becoming due and payable under section 59D or 59E, but

(b) the Commissioners for Her Majesty's Revenue and Customs—

(i) may not seek payment of the tax otherwise than in accordance with the plan;

(ii) may make repayments in respect of any amount of the tax paid, or any amount paid on account of the tax, before the plan is entered into.

(3) As regards interest—

(a) the tax carries interest in accordance with Part 9 as if the plan had not been entered into, and

(b) each time a payment is made under the plan, it is to be paid together with any interest payable on it.

(4) As regards penalties, the company will be liable to penalties for late payment of the tax only if it fails to make payments in accordance with the plan (see item 6ZA of the Table at the end of paragraph 1 of Schedule 56 to the Finance Act 2009).

(5) Qualifying corporation tax payable in accordance with **[**F5a CT exit charge payment plan**]** which is for the time being unpaid may be paid at any time before it becomes payable under the plan together with interest payable on it to the date of payment.

Content of [F3 CT exit charge payment plan]

10 (1) **[**F5A CT exit charge payment plan**]** entered into by a Part 1 company must specify—

(a) the date on which the company ceased to be resident in the United Kingdom, and

(b) the **[**F21relevant**]**EEA state in which the company has become resident.

(2) **[**F5A CT exit charge payment plan**]** entered into by a Part 2 company must specify—

(a) the EEA state in which the company is resident, and

(b) if the company has ceased to carry on a trade in the United Kingdom through a permanent establishment there, the date on which it ceased to do so.

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[In either case a CT exit charge payment plan entered into by a company must specify
F22(2A) requirements as to the ongoing provision of information by the company to Her Majesty's Revenue and Customs in relation to the exit charge assets and liabilities.**]**

(3) In either case **[**F5a CT exit charge payment plan**]** entered into by a company must also specify—

(a) the amount of qualifying corporation tax which, in the company's opinion, is payable by it in respect of the migration accounting period,

(b) the amount of that qualifying corporation tax which the company wishes to defer paying under the **[**F3CT exit charge payment plan**]** ("ECPP tax"), and

[F23(c) the amount of ECPP tax attributable to each exit charge asset or liability.**]**

F24(4) . . . . . .

F25(5) . . . . . .

(6) The amount of ECPP tax attributable to each exit charge asset or liability is—

$$\frac{A}{B} \times T$$

where—

"A" is the income, profits or gains arising in respect of the asset or liability in the migration accounting period by virtue of the relevant exit charge provision only,

"B" is the total income, profits or gains arising in respect of all the exit charge assets and liabilities in the migration accounting period by virtue of the exit charge provisions only, and

"T" is the ECPP tax.

Textual Amendments

F21 Word in Sch. 3ZB para. 10(1)(b) inserted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 5(2)**

F22 Sch. 3ZB para. 10(2A) inserted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 5(3)**

F23 Sch. 3ZB para. 10(3)(c) substituted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 5(4)**

F24 Sch. 3ZB para. 10(4) omitted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 5(5)**

F25 Sch. 3ZB para. 10(5) omitted (with effect in accordance with Sch. 8 para. 8 of the amending Act) by virtue of Finance Act 2019 (c. 1), **Sch. 8 para. 5(5)**

[F26The payment method

Textual Amendments

F26 Sch. 3ZB paras. 11-14 and cross-headings substituted for Sch. 3ZB paras. 11-17 (with effect in accordance with Sch. 8 para. 8 of the amending Act) by Finance Act 2019 (c. 1), **Sch. 8 para. 6**

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11 (1) Where a CT exit charge payment plan is entered into the ECPP tax is due in 6 instalments of equal amounts as follows—

(a) the first instalment is due on the first day after the period of 9 months beginning immediately after the end of the migration accounting period, and

(b) the other 5 instalments are due one on each of the first 5 anniversaries of that day.

(2) But see paragraphs 12, 13 and 14 for circumstances in which all or part of the outstanding balance of the ECPP tax becomes due otherwise than by those instalments.

All of outstanding balance due

12 (1) Where an event mentioned in subparagraph (2) occurs, the outstanding balance of the ECPP tax is due on the date on which the next instalment of that tax would otherwise have been due.

(2) The events are—

(a) the company becoming insolvent or entering administration,

(b) the appointment of a liquidator,

(c) an event under the law of a country or territory outside the United Kingdom corresponding to an event specified in paragraph (a) or (b),

(d) the company ceasing to be resident in a relevant EEA state and, on so ceasing, not becoming resident in another relevant EEA state, or

(e) the company failing to pay any amount of the ECPP tax for a period of 12 months after the date on which the amount becomes due.

All of outstanding balance attributable to particular exit charge asset or liability due

13 (1) This paragraph applies where—

(a) a trigger event occurs in relation to an exit charge asset or liability during the instalments period, and

(b) a trigger event has not previously occurred in relation to that asset or liability during that period.

(2) A trigger event occurs in relation to a TCGA or trading stock exit charge asset or an intangible exit charge asset if the company—

(a) disposes of the asset, or

(b) ceases to hold the asset for the purposes of a business carried on by the company in a relevant EEA state and, on so ceasing, does not begin to hold it for the purposes of another such business.

(3) A trigger event occurs in relation to a financial exit charge asset or liability if the company—

(a) ceases to be a party to the loan relationship or derivative contract in question, or

(b) ceases to be a party to the loan relationship or derivative contract in question for the purposes of a business carried on by the company in a relevant EEA state and, on so ceasing, does not begin to be a party to it for the purposes of another such business.

(4) On the occurrence of the trigger event an amount of the ECPP tax is due.

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(5) The amount due is—

$$(A - B) \times \frac{O}{T}$$

Where—

"A" is the amount of ECPP tax attributable to the exit charge asset or liability (see paragraph 10(6)),

"B" is the amount of ECPP tax that has previously become due under paragraph 14 by reason of a partial trigger event occurring in relation to the exit charge asset or liability,

"O" is the amount of ECPP tax that is outstanding at the time of the trigger event, and

"T" is the amount of ECPP tax.

(6) In this paragraph and paragraph 14 "the instalments period" means the period—

(a) beginning immediately after—

(i) the company ceases to be resident in the United Kingdom (in the case of a Part 1 company), or

(ii) the occurrence of the PE qualifying event in respects of the asset or liability concerned (in the case of a Part 2 company), and

(b) ending with the day on which the final instalment of the ECPP tax is due under paragraph 11.

Part of outstanding balance attributable to particular exit charge asset or liability due

14 (1) This paragraph applies if—

(a) a partial trigger event occurs in relation to an exit charge asset or liability during the instalments period, and

(b) a trigger event has not previously occurred in relation to that asset or liability during that period.

(2) A partial trigger event occurs in relation to a TCGA or trading stock exit charge asset if the company disposes of part (but not all) of the asset.

(3) A partial trigger event occurs in relation to a financial exit charge asset or liability if there is a disposal of a right or liability under the loan relationship or derivative contract in question which amounts to a related transaction (as defined in section 304 or 596 of CTA 2009 as the case may be).

(4) A partial trigger event occurs in relation to an intangible exit charge asset if there is a transaction which results in a reduction in the accounting value of the asset but not in the asset ceasing to be recognised in the company's balance sheet.

(5) On the occurrence of the partial trigger event an amount of the outstanding ECPP tax is due.

(6) The amount due is the amount that is just and reasonable having regard to the amount that would have been due had a trigger event occurred in relation to the exit charge asset or liability instead.

(7) In this paragraph "trigger event" has the same meaning as in paragraph 13.**]]**

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

- Blanket Amendment words substituted by 2005 c. 4 Sch. 11 para. 5

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

- s. 12ABZAA(5)(a) words substituted by 2017 c. 32, Sch. 14 para. 10BA(3)(a) (as inserted) by 2020 c. 14 s. 104(4)
- s. 12ABZAA(5)(b) words substituted by 2017 c. 32, Sch. 14 para. 10BA(3)(b) (as inserted) by 2020 c. 14 s. 104(4)
- s. 7(1BA) words substituted by 2017 c. 32 Sch. 14 para. 2(3)
- s. 8(1AB)-(1AD) inserted by 2017 c. 32 Sch. 14 para. 3(5)
- s. 8(1HA) inserted by 2017 c. 32 Sch. 14 para. 3(11)
- s. 8A(1)(1ZA) substituted for s. 8A(1) by 2017 c. 32 Sch. 14 para. 4(3)
- s. 8A(1AB)-(1AD) inserted by 2017 c. 32 Sch. 14 para. 4(5)
- s. 8A(1FA) inserted by 2017 c. 32 Sch. 14 para. 4(9)
- s. 8A(6)(7) inserted by 2017 c. 32 Sch. 14 para. 4(12)
- s. 12B(1)(1A) substituted for s. 12B(1) by 2017 c. 32 Sch. 14 para. 14(2)
- s. 12B(2ZA)(2ZB) inserted by 2017 c. 32 Sch. 14 para. 14(4)
- s. 12C and cross-heading inserted by 2017 c. 32 s. 60(2)
- s. 12AC(1)(aa) inserted by 2017 c. 32 Sch. 14 para. 13(2)(c)
- s. 12AC(7)(a) words inserted by 2017 c. 32 Sch. 14 para. 13(3)(b)
- s. 12AC(7)(a) words renumbered as s. 12AC(7)(a) by 2017 c. 32 Sch. 14 para. 13(3)(a)
- s. 12AC(7)(b) inserted by 2017 c. 32 Sch. 14 para. 13(3)(c)
- s. 12ABA(5) inserted by 2017 c. 32 Sch. 14 para. 11(4)
- s. 28ZA(6)(c) inserted by 2017 c. 32 Sch. 14 para. 15(b)
- s. 29(6)(aa) inserted by 2017 c. 32 Sch. 14 para. 20(3)
- s. 29(7)(a)(ia) omitted by 2019 c. 1 Sch. 2 para. 25(6)
- s. 46B(5)(f) and word inserted by 2009 c. 4 Sch. 1 para. 303
- s. 49E(5A) inserted by 2021 c. 26 Sch. 27 para. 4
- s. 49EA inserted by 2021 c. 26 Sch. 27 para. 5
- s. 49FA inserted by 2021 c. 26 Sch. 27 para. 6
- s. 61(1A) inserted by 2007 c. 15 Sch. 13 para. 33(3)
- s. 61(1A) omitted by 2008 c. 9 Sch. 43 para. 1(3)
- s. 63(2)(aa) inserted by 2007 asp 3 Sch. 5 para. 9(2)
- s. 69(1)(aa) inserted by 2021 c. 26 Sch. 27 para. 7(a)
- s. 103ZA(m)-(o) inserted by 2021 c. 26 Sch. 27 para. 8(b)
- s. 107A(3)(e) inserted by 2021 c. 26 Sch. 27 para. 9(3)(c)
- Sch. A1 amendment to earlier affecting provision 2017 c. 32, s. 60 by 2018 c. 3 Sch. 6 para. 7(2)(a)
- Sch. A1 amendment to earlier affecting provision 2017 c. 32, s. 60 by 2018 c. 3 Sch. 6 para. 7(2)(b)
- Sch. A1 inserted by 2017 c. 32 s. 60(3)