## **INCOME TAX ACT 2007**

## **EXPLANATORY NOTES**

## **COMMENTARY ON SECTIONS**

Schedule 1: Minor and consequential amendments

Part 1: Income and Corporation Taxes Act 1988

## Section 556

3177. Following the House of Lords decision in Agassi v Robinson [2006 UKHL 23]<sup>1</sup>, section 556 of ICTA has been amended to make clear that when a payment or transfer of the type referred to in section 555 of ICTA is made, no liability to corporation tax will arise regardless of whether there is a duty to deduct income tax under section 555 of ICTA. See *Change 156* in Annex 1.