CORPORATION TAX ACT 2009

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Part 5: Loan Relationships

Overview

Chapter 13: European cross-border transfers of business

Overview

Section 427: Procedure on application for clearance

- 1256. This section gives the rules that apply where a clearance application is made under section 426 to the Commissioners for HMRC. It is based on paragraph 12F(3) of Schedule 9 to FA 1996.
- 1257. Paragraph 12F(3) applies the rules in section 138(2) to (5) of TCGA which this and the following section write out in full.