



Taxation (International and Other Provisions) Act 2010

2010 CHAPTER 8

[^{F1}PART 6A

HYBRID AND OTHER MISMATCHES

CHAPTER 10

DUAL TERRITORY DOUBLE DEDUCTION CASES

[^{F1}Introduction

Textual Amendments

- F1** Pt. 6A inserted (with effect in accordance with Sch. 10 paras. 18-21 of the amending Act) by [Finance Act 2016 \(c. 24\), Sch. 10 para. 1](#)

259J Overview of Chapter

- (1) This Chapter contains provision that counteracts double deduction mismatches that it is reasonable to suppose would otherwise arise as a result of a company—
 - (a) being a dual resident company, or
 - (b) being a relevant multinational company.
- (2) The counteraction operates by altering the corporation tax treatment of the company.
- (3) Section 259JA contains the conditions that must be met for this Chapter to apply.
- (4) Subsection (3) of that section defines “dual resident company”.

Changes to legislation: There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Cross Heading: Introduction. (See end of Document for details)

- (5) Subsection (4) of that section defines “relevant multinational company”, “parent jurisdiction” and “PE jurisdiction”.
- (6) Subsection (5) of that section defines “dual territory double deduction amount”.
- (7) Section 259JB contains provision that counteracts the mismatch where the company is a dual resident company.
- (8) Section 259JC contains provision that counteracts the mismatch where the company is a multinational company and the United Kingdom is the parent jurisdiction.
- (9) Section 259JD contains provision that counteracts the mismatch where the company is a relevant multinational company, the United Kingdom is the PE jurisdiction and the mismatch is not counteracted under a provision of the law of a territory outside the United Kingdom that is equivalent to section 259JC.
- (10) See also section 259BF for the meaning of “permanent establishment”.]

Changes to legislation:

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