



# Taxation (International and Other Provisions) Act 2010

## 2010 CHAPTER 8

### PART 4

#### TRANSFER PRICING

### CHAPTER 2

#### KEY INTERPRETATIVE PROVISIONS

*Meaning of certain expressions that first appear in section 147*

**151 “Arm’s length provision”**

- (1) In this Part “the arm’s length provision” has the meaning given by section 147(1).
- (2) For the purposes of this Part, the cases in which provision made or imposed as between any two persons is to be taken to differ from the provision that would have been made as between independent enterprises include the case in which provision is made or imposed as between two persons but no provision would have been made as between independent enterprises; and references in this Part to the arm’s length provision are to be read accordingly.