



# Taxation (International and Other Provisions) Act 2010

## 2010 CHAPTER 8

### PART 7

#### TAX TREATMENT OF FINANCING COSTS AND INCOME

### CHAPTER 5

#### INTRA-GROUP FINANCING INCOME WHERE PAYER DENIED DEDUCTION

#### **300** Meaning of “relevant associate”

For the purposes of this Chapter, the payer is a “relevant associate” of the recipient if—

- (a) the payer is a parent of the recipient,
- (b) the payer is a 75% subsidiary of the recipient, or
- (c) the payer is a 75% subsidiary of a parent of the recipient.