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SCHEDULES

SCHEDULE 19

LARGE BUSINESSES: TAX STRATEGIES AND SANCTIONS

PART 2

PUBLICATION OF TAX STRATEGIES

Qualifying UK groups: duty to publish a group tax strategy

- 16 (1) This paragraph applies in relation to a UK group which is a qualifying group in any financial year (“the current financial year”).
- (2) The head of the group must ensure that a group tax strategy for the group, containing the information required by paragraph 17, is prepared and published on behalf of the group in accordance with this paragraph.
- (3) The group tax strategy—
- (a) must be published before the end of the current financial year, and
 - (b) if the group was a qualifying group in the previous financial year, must not be published more than 15 months after the day on which its previous group tax strategy was published.
- (4) The group tax strategy—
- (a) must be published on the internet by any of the UK companies that are members of the group so as to be accessible to the public free of charge (whether or not it is also published in any other way), and
 - (b) may be published as a separate document or as a self-contained part of a wider document.
- (5) The head of the group must ensure that the group tax strategy published on the internet remains accessible to the public free of charge—
- (a) if a group tax strategy for the group's next financial year is required by this paragraph to be published, until that tax strategy is published, or
 - (b) if paragraph (a) does not apply, for at least one year.
- (6) For the purposes of this paragraph—
- (a) a group tax strategy is published when it is first published on the internet as mentioned in paragraph (4)(a),
 - (b) the identity of the group is not to be regarded as altered by any change in its membership during the current financial year resulting from a relevant body—
 - (i) becoming a 51% subsidiary of a member of the group, or
 - (ii) ceasing to be a 51% subsidiary of another member of the group; and

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- (c) if the group becomes a UK sub-group of a foreign group during the current financial year, it is to be treated for the rest of that year as if it were still a UK group.
- (7) In this paragraph and paragraph 17 “financial year”, in relation to a UK group, means a financial year of the head of the group.

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Changes and effects yet to be applied to the whole Act associated Parts and Chapters:

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- Sch. 19 para. 12(5)(b) inserted by [2017 c. 32 Sch. 14 para. 49\(2\)\(c\)](#)
- Sch. 19 para. 12(5)(a) word inserted by [2017 c. 32 Sch. 14 para. 49\(2\)\(b\)](#)
- Sch. 19 para. 51(8)(b) words inserted by [2017 c. 32 Sch. 14 para. 48\(2\)](#)
- Sch. 19 para. 53(1) words inserted by [2017 c. 32 Sch. 14 para. 48\(4\)\(a\)](#)
- Sch. 19 para. 53(1) words inserted by [2017 c. 32 Sch. 14 para. 48\(4\)\(b\)](#)
- Sch. 19 para. 12(5)(a) words renumbered as Sch. 19 para. 12(5)(a) by [2017 c. 32 Sch. 14 para. 49\(2\)\(a\)](#)
- Sch. 19 para. 58(1) words substituted by [2017 c. 32 Sch. 14 para. 48\(5\)](#)
- Sch. 20 para. 1(4)(e) inserted by [2021 c. 26 Sch. 27 para. 47\(2\)](#)
- Sch. 20 para. 3(3)(d) and word inserted by [2021 c. 26 Sch. 27 para. 47\(3\)\(b\)](#)
- Sch. 20 para. 5(5) inserted by [2021 c. 26 Sch. 27 para. 47\(5\)](#)
- Sch. 22 para. 2(4B) inserted by [2021 c. 26 Sch. 27 para. 48\(2\)\(c\)](#)
- Sch. 22 para. 3(4A) inserted by [2021 c. 26 Sch. 27 para. 48\(3\)](#)