Document Generated: 2024-06-03

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SCHEDULES

SCHEDULE 19

LARGE BUSINESSES: TAX STRATEGIES AND SANCTIONS

PART 2

PUBLICATION OF TAX STRATEGIES

Assessment of penalties

- 29 (1) Where a person becomes liable to a penalty—
 - (a) HMRC may assess the penalty, and
 - (b) if they do so, HMRC must notify the person of the assessment.
 - (2) An assessment of a penalty may not be made—
 - (a) more than 6 months after the failure first comes to the attention of an officer of Revenue and Customs, or
 - (b) more than 6 years after the end of the financial year in which the tax strategy to which the failure relates was (or was originally) required to be published.

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