

SCHEDULES

SCHEDULE 20

TAXATION OF HYBRID CAPITAL INSTRUMENTS

PART 2

CORPORATION TAX, INCOME TAX AND CAPITAL GAINS TAX

Consequential amendments

- 9 (1) The Loan Relationships and Derivative Contracts (Disregard and Bringing into Account of Profits and Losses) Regulations 2004 (S.I. 2004/3256) are amended in accordance with this paragraph.
- (2) In regulation 2(1) (interpretation)—
- (a) after the definition of “fair value profit or loss” insert—
““hybrid capital instrument” has the meaning given by section 475C of CTA 2009;”, and
- (b) omit the definition of “regulatory capital security”.
- (3) In regulation 3 (exchange gains or losses arising from liabilities or assets hedging shares etc), in paragraph (5)(c), for “a regulatory capital security” substitute “a hybrid capital instrument”.
- (4) In regulation 4 (exchange gains or losses arising from derivative contracts hedging shares etc), in paragraph (4A)(c), for “a regulatory capital security” substitute “a hybrid capital instrument”.