Most payments made by a company to its shareholders in respect of their shares will be qualifying distributions and may be subject to Income Tax. This help sheet provides information to help you understand, where a company makes a purchase of its own shares, the conditions that must be met before the payment can be treated as an exempt distribution. It also provides details of how a company can make a clearance application in connection with the purchase of own shares legislation.

It provides a guide to straightforward situations, but is not intended to cover all cases. Further guidance can be found in the Company Taxation Manual which explains the rules in more detail at CTM17500 onwards, and in HM Revenue & Custom’s Statement of Practice SP2/82. The legislation is contained in sections 1033 - 1048 Corporation Tax Act (CTA) 2010.

For the purposes of this help sheet, an exempt distribution is a payment that is not treated as a distribution but instead treated as consideration for the disposal of shares and subject to Capital Gains Tax. References to purchase of own shares also include cases where a payment is made by a company on the redemption or repayment of its own shares.

**Clearance applications**

As a general principle, where a company makes a purchase of its own shares, any excess paid over the amount of capital originally subscribed for the shares is a distribution. However special provisions in section 1033 CTA 2010 enable an unquoted trading company or an unquoted holding company of a trading group to undertake a purchase of its own shares without making a distribution.

The legislation also provides a clearance procedure. Under this procedure a company wishing to make a purchase of its own shares can obtain advance confirmation from the Commissioners for HMRC that the distribution arising will be an exempt distribution. Instead the payment is treated as consideration for the disposal of the shares in the hands of the seller and subject to Capital Gains Tax.

**Who can make a clearance application?**

A company may make an application before making a payment on the purchase of its own shares. Broadly there are two situations in which a payment on the purchase by a company of its own shares is not treated as a distribution. The company must be an unquoted trading company and one of the following conditions must be met:

**Condition A:** The purchase must be made wholly or mainly for the purpose of benefiting the trade carried on by the company and not form part of a scheme or arrangement where the main purpose or one of the main purposes is to enable the seller to participate in the profits of the company without receiving a dividend or the avoidance of tax. Certain conditions set out in sections 10341043 CTA 2010 should also be satisfied; the flowcharts in this guidance give further details of these conditions.

**Condition B:** The whole, or substantially the whole, of the payment must be applied by the recipient in discharging a liability for inheritance tax (IHT) charged on a death, within two years after the death, where the liability could not otherwise have been paid without causing undue hardship.
Condition A: Purchase benefiting a company’s trade

To be eligible to make a clearance application the following conditions need to be satisfied:

- the company must be an unquoted trading company
- the purchase must be made wholly or mainly for the purpose of benefiting the trade carried on by the company or any of its 75 per cent subsidiaries
- the seller must be a UK resident at the time in which the purchase is made
- the seller must have owned the shares for five years or more ending with the date of the purchase. This may be reduced to three years if the seller acquired the shares under the will or intestacy of a former shareholder
- the shareholding interests of the seller and their associates in the company (and group, if appropriate) must be substantially reduced
- the seller and their associates must not be connected to the company after the purchase takes place
- the purchase does not form part of a scheme or arrangement which has a main purpose either of enabling the seller to participate in the profits of the company without receiving a dividend or of avoiding tax

The following flowcharts will help you decide whether the necessary conditions have been met. It has been divided into three consequential qualifying stages:

1. Basics
2. Substantial Reduction Calculation
3. Purpose

There are notes to guide you through the charts and help you decide whether you have met each condition.
Stage 1: Basics

Is the company quoted?
(Note 1.1)

- **YES**
  - Payment will not qualify as an exempt distribution
- **NO**

Is the company a trading company or a holding company of a trading group?
(Note 1.2)

- **YES**
  - Payment will not qualify as an exempt distribution
  - Move on to Stage 2: Substantial reduction calculation
- **NO**

Will the seller be resident in the UK in the tax year in which the purchase is made?
(Note 1.3)

- **YES**
  - Will the shares have been owned throughout five years ending with the date of the purchase?
  (Note 1.4)
    - **YES**
      - Were the shares inherited?
      (Note 1.5)
        - **YES**
          - Move on to Stage 2: Substantial reduction calculation
        - **NO**
      - Payment will not qualify as an exempt distribution
    - **NO**
  - Payment will not qualify as an exempt distribution
- **NO**

Will the shares have been owned throughout five years ending with the date of the purchase?
(Note 1.4)

- **YES**
  - Will the shares have been owned throughout three years ending with the date of the purchase?
  (Note 1.5)
    - **YES**
      - Move on to Stage 2: Substantial reduction calculation
    - **NO**
  - Payment will not qualify as an exempt distribution
- **NO**

Were the shares inherited?

- **YES**
  - Move on to Stage 2: Substantial reduction calculation
- **NO**

(End of Stage 1: Basics)
Basics notes

1.1: A quoted company means a company whose shares (or any class of whose shares) are listed in the official list of a stock exchange. Note shares include stock.

An unquoted company means a company which is neither a quoted company nor a 51 per cent subsidiary of a quoted company.

1.2: A trading company means a company whose business consists wholly or mainly of carrying on a trade. A trade does not include dealing in shares, securities, land or futures.

A trading group means a group the business of whose members (taken together) consist wholly or mainly of carrying on a trade. Again a trade does not include dealing in shares, securities, land or futures.

1.3: The seller (and the seller’s nominee, if any) must be resident in the UK in the tax year in which the purchase is made. Personal representatives are treated as resident in the UK only if the deceased was resident in the UK immediately prior to death.

For the majority of people the question of residence for tax purposes is quite straightforward. You can consult our Residence, Domicile and Remittance Basis Manual which explains the rules in more detail at RDRM1000 onwards.

1.4: The shares which are purchased by the company must have been owned by the seller for a period of five years ending with the date of the purchase.

Where the seller has made more than one acquisition of shares of the same class that are being redeemed, repaid or sold to the company, earlier acquisitions of shares are taken into account before later acquisitions. However earlier disposals are treated as being made on a last in, first out basis. This gives the seller the longest possible period of ownership for this purpose.

EXAMPLE 1: You are selling 800 shares in 2014. You acquired the same class of shares in the following years:

<table>
<thead>
<tr>
<th>Year</th>
<th>Shares</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>500</td>
</tr>
<tr>
<td>2008</td>
<td>500</td>
</tr>
<tr>
<td>2010</td>
<td>500</td>
</tr>
</tbody>
</table>

In 2011 you sold 600 to an unconnected third party. This earlier disposal is identified with the 500 shares acquired in 2010, and the balance of 100 with the 2008 acquisition. You will be left with the following shares:

<table>
<thead>
<tr>
<th>Year</th>
<th>Shares</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>500</td>
</tr>
<tr>
<td>2008</td>
<td>400</td>
</tr>
<tr>
<td>2010</td>
<td>0</td>
</tr>
</tbody>
</table>

The 800 shares sold in 2014 are identified with the 500 shares purchased in 2007, and the balance of 300 shares purchased in 2008.
In determining the period of ownership, if at any time during the five year period, the shares were transferred between spouses or civil partners who were living together at the date of transfer then the periods of ownership of both spouses or civil partners are aggregated.

EXAMPLE 2: Mrs S acquired the shares in R Ltd on 1 January 2008. On 1 January 2012, after holding the shares for four years, she transferred the shares to her husband. Mr S sells all of his shares to R Ltd on 1 January 2015. Mr and Mrs S have been married and living together continuously since 2000.

Without this provision Mr S alone would not satisfy the period of ownership condition as he has personally held the shares for less than five years. However as Mr and Mrs S were married and living together at the time of the transfer of the shares (1 January 2010) as well as the time of the purchase of the shares by R Ltd (1 January 2013), Mr S can treat the period during which the shares were owned by Mrs S as part of his period of ownership. Mr S is treated as having owned the shares for more than five years so the period of ownership condition is satisfied.

1.5: The minimum period of ownership is reduced to three years if the seller acquired the shares under the will or intestacy of a former shareholder. The seller’s or personal representative’s holding period is aggregated with that of the previous owner.
Stage 2: Substantial reduction calculation

1. Is the purchasing company a member of a group? (Note 2.1)
   - Yes: Special rules apply for groups which we do not cover in this help sheet. The Clearance Team can advise on more complex situations
   - No:
     2. Seller’s interest as shareholder immediately after purchase is less than 75 per cent of the seller’s interest immediately before? (Note 2.2)
        - Yes: Payment will not qualify as an exempt distribution
        - No:
          3. Seller and seller’s associates combined interest in company as shareholders immediately after purchase is less than 75 per cent of the combined interest immediately before purchase? (Note 2.4)
             - Yes: Do any associates of the seller own shares in the company? (Note 2.3)
                - Yes: Payment will not qualify as an exempt distribution
                - No: Is the seller connected with the purchasing company immediately after the purchase? (Note 2.5)
                    - Yes
                    - No: Move on to Stage 3: Purpose

Payment will not qualify as an exempt distribution
Substantial reduction calculation notes

2.1: For this purpose a group is a company and its 51 per cent subsidiaries.

2.2: If the seller retains shares in the company after the purchase, his or her interest as a shareholder in the company must be substantially reduced after the purchase. The substantial reduction in the seller’s interest as a shareholder in the company is considered in two ways; by reference to the issued share capital and entitlement to profits.

2.2.1 Reduction in seller’s shareholding: To test whether there has been a reduction in the seller’s shareholding, the relevant proportion immediately after the sale is compared with that immediately before the purchase. The relevant proportion is the nominal value of the shares owned by the seller divided by the issued share capital of the company. If the seller’s interest immediately after the purchase is not more than 75 per cent of their interest immediately before the purchase, it has been substantially reduced.

The calculation must take into account the fact that the number of shares in issue will have decreased after the purchase as these shares are normally cancelled by the company.

EXAMPLE 3: A Ltd has an issued share capital of £1000 comprising of 1000 £1 shares. You hold 400 of those shares and sell 250 shares to the company.

Immediately before the sale you hold 40 per cent of the issued share capital:

\[
\begin{align*}
400 & \text{-nominal value of shares owned} \\
1000 & \text{-total issued share capital}
\end{align*}
\]

After the sale you hold 20 per cent of the issued share capital:

\[
\begin{align*}
150 & \text{-nominal value of shares owned} \quad (400 - 250) \\
750 & \text{-total issued share capital} \quad (1000 - 250)
\end{align*}
\]

A 75 per cent reduction in your shareholding would leave you with 30 per cent of the issued share capital (75 per cent of 40 per cent is 30 per cent).

After the sale you hold 20 per cent of the issued share capital so your shareholding interest has reduced to no more than 75 per cent of the original holding and the substantial reduction test has been met.

2.2.2 Reduction in seller’s entitlement to share in the profits: Broadly the seller’s interest as a shareholder is taken to be substantially reduced if the company were to distribute all its profits available for distribution and the seller’s entitlement to a share of those profits (expressed as a fraction of the total of those profits) immediately after the purchase would be less than 75 per cent of the corresponding fraction immediately before the purchase.
We do not cover the second condition further in this help sheet. Where there are complex profit sharing arrangements, the Clearance Team will be able to advise.

2.3: When applying the calculation, the interests of any persons associated with the seller are also relevant. For this purpose, associates are:

2.3.1 Spouses or civil partners who live together
2.3.2 Children aged under 18 and their parents
2.3.3 If one person is accustomed to acting on the directions of another person in relation to the affairs of a company, the two persons are associates of one another in relation to that company
2.3.4 A person who is connected (as defined in section 2.5) with a company is an associate of that company as well as any company controlled by it.

EXAMPLE 4: You are the sole shareholder of X Ltd. X Ltd has a 100 per cent subsidiary, Y Ltd. You are an associate of X Ltd and Y Ltd.

EXAMPLE 5: You are the sole shareholder of C Ltd and D Ltd. C Ltd is an associate of Company D Ltd and vice versa.

There are additional rules for trustee and personal representative shareholders which we do not cover in this help sheet.

2.4: If, immediately after the purchase, any associate of the seller (as defined in section 2.3) owns shares in the company, the interests of the seller’s associates must be aggregated with the seller’s interests and the combined interests must be substantially reduced.

EXAMPLE 6: E Ltd has an issued share capital of £1000 comprising of 1000 £1 shares. Mr and Mrs F, who are married and living together, each own 500 shares in the company. As they are spouses, Mr F is associated with Mrs F and vice versa.

Mr F wishes to sell his share in the company and it is agreed that E Ltd will purchase all 500 shares held by Mr F.

Immediately before the sale Mr F and his associate, Mrs F, hold 100 per cent of the issued share capital:

<table>
<thead>
<tr>
<th>Mr F’s shareholding</th>
<th>+</th>
<th>His associate’s, Mrs F, shareholding</th>
<th>=</th>
<th>Mr F’s notional shareholding</th>
</tr>
</thead>
<tbody>
<tr>
<td>500 (50 per cent)</td>
<td>+</td>
<td>500 (50 per cent)</td>
<td>=</td>
<td>1000 (100 per cent)</td>
</tr>
<tr>
<td>1000</td>
<td></td>
<td>1000</td>
<td></td>
<td>1000</td>
</tr>
</tbody>
</table>
EXAMPLE 6 CONTINUED: After the sale the total issued share capital will be 500 shares (1000 \(\text{\small \(\div\) } 500\)) and these shares will be held solely by Mrs F. However there has not been a substantial reduction in Mr F’s shareholding as his associate, Mrs F, still holds all the issued share capital:

\[
\begin{align*}
\text{Mr F’s shareholding} & \quad + \quad \text{His associate’s (Mrs F) shareholding} \\
0 \ (0 \text{ per cent}) & \quad + \quad 500 \ (100 \text{ per cent}) \\
500 & \quad 500 \\
\end{align*}
\]

\[
\text{Mr F’s notional shareholding} = 500 \ (100 \text{ per cent})
\]

2.5: The seller must not be connected with the company, or any company in the same group, following the purchase of shares. A person will be treated as connected with the company if they:

2.5.1 Possess, or are entitled to possess, more than 30 per cent of the issued ordinary share capital, loan capital or voting power

2.5.2 Are entitled to receive more than 30 per cent of the assets on a winding up of the company

In applying the connection test, interests of the seller’s associates are aggregated with the seller’s.

Note that if the loan capital of the company was acquired in the ordinary course of a business carried on by the shareholder which includes the lending of money and the shareholder takes no part in the management or conduct of the company, his interest in the loan capital is disregarded in applying the 30 per cent test.

EXAMPLE 7: G Ltd has an issued share capital of £1000 comprising of 1000 £1 shares. You hold 500 of those shares and sell 250 shares to the company.

Immediately before the sale you hold 50 per cent of the issued share capital:

\[
\begin{align*}
500 & \quad - \quad \text{nominal value of shares owned} \\
1000 & \quad - \quad \text{total issued share capital}
\end{align*}
\]

After the sale you hold 33.3 per cent of the issued share capital:

\[
\begin{align*}
250 & \quad - \quad \text{nominal value of shares owned (500 \(\text{\small \(\div\) } 250\))} \\
750 & \quad - \quad \text{total issued share capital (1000 \(\text{\small \(\div\) } 250\))}
\end{align*}
\]

The shareholding interest is less than 75 per cent of that held previously but as you still possess more than 30 per cent of the remaining issued share capital, the purchase does not pass the connection test.
Stage 3: Purpose

Is the purchase being made wholly or mainly for the purpose of benefiting a trade carried on by the company or any of its 75 per cent subsidiaries? (Note 3.1)

- **YES**
  - Is the purchase part of a scheme or arrangement to enable the owner of shares to participate in profits without actually receiving a dividend? (Note 3.2)
    - **YES**
      - Payment will not qualify as an exempt distribution
    - **NO**
      - Is the purchase part of a tax avoidance scheme or arrangement? (Note 3.2)
        - **YES**
          - Payment will not qualify as an exempt distribution
        - **NO**
          - Make a Clearance Application

- **NO**
  - Payment will not qualify as an exempt distribution
Purpose notes

3.1: The company’s sole or main purpose in making the payment must be to benefit a trade carried on by it or by its 75 per cent subsidiary. The condition is not satisfied where, for example, the transaction is designed to serve the personal or wider commercial interests of the seller (although usually the seller will benefit from it) or where the intended benefit for the company is to some non-trading activity which it also carries on.

If there is a disagreement between shareholders over the management of the company and that disagreement is having or is expected to have an adverse effect on the company’s trade, then the purchase will usually be regarded as satisfying the trade benefit test provided the effect of the transaction is to remove the dissenting shareholder entirely. Similarly, if the purpose is to ensure that an unwilling shareholder who wishes to end his association with the company does not sell his shares to someone who might not be acceptable to the other shareholders, the purchase will normally be regarded as benefiting the company’s trade. Examples of unwilling shareholders are:
- an outside shareholder who has provided equity finance (whether or not with the expectation of redemption or sale to the company) and who now wishes to withdraw that finance
- a controlling shareholder who is retiring as a director and wishes to make way for new management
- personal representatives of a deceased shareholder, where they wish to realise the value of the shares
- a legatee of a deceased shareholder, where he does not wish to hold shares in the company

If the company is not buying all the shares owned by the seller, or if although the seller is selling all his shares he is retaining some other connection with the company- for example, a directorship or an appointment as a consultant- it would seem unlikely that the transaction could benefit the company’s trade, so the trade benefit test will probably not be satisfied. However there are exceptions; for example, where a company does not currently have the resources to buy out its retiring controlling shareholder completely but purchases as many of his or her shares as it can afford with the intention of buying the remainder where possible. In these circumstances it may still be possible to show that the main purpose is to benefit the company’s trade. Also the Commissioners for HMRC do not raise any objection, if for sentimental reasons, it is desired that a retiring director of a company should retain a small shareholding in it, not exceeding 5 per cent of the issued share capital.

3.2: The payment should not form part of a scheme or arrangement which aims either to enable the seller to participate in the profits of the company without receiving a dividend or of which the avoidance of tax is the main or one of the main purposes. The exemption will not apply if there is any such arrangement.

Condition B: Purchase in connection with IHT liability

If the payment made by an unquoted trading company (see notes 1.1 and 1.2 for definition of ‘unquoted’ and ‘trading’) for the redemption, repayment or purchase of its own shares is used by the seller to pay inheritance tax charged on a death, the payment may be treated otherwise than as a distribution by the company if the following conditions are satisfied:-
- substantially the whole (meaning nearly all) of the purchase money is applied by the seller in paying the tax liability
- the tax was charged on a death
- the payment received from the company is applied in the discharge of the tax liability within two years after the death, and
- the tax so paid could not otherwise have been paid without undue hardship
The payment by the company must be received by the person who is liable for the inheritance tax. Any Capital Gains Tax which is chargeable in respect of the disposal of the shares to the company may also be discharged out of the payment received from the company for the shares.

**How to make a clearance application**

A company wishing to make a purchase of its own shares can obtain advance confirmation from the Board that the distribution arising will be an exempt distribution. Clearance applications are the responsibility of the Clearance and Counteraction Team in the Counter-Avoidance directorate. Applications should be sent to:

Address: BAI Clearance, HMRC, BX9 1JL
Email: reconstructions@hmrc.gsi.gov.uk

HMRC will be able to process your application more efficiently if you send your clearance application by email. Attachments to emails should be no larger than 2 MB. Please do not send self-extracting zip files as our software will block them.

HMRC cannot guarantee the security of emails you send to us or we send to you over the Internet. Any information you send us by email is at your own risk. It is important that you have assessed the risks of using email to send information or to receive it from us. If you would like us to reply by email, please tell us so and confirm that you understand and accept the risks involved using email. We will not always be able to reply by email.

To enable HMRC to reach a decision on the application with the minimal of delay, we have included a checklist outlining the information we need. It will assist us if you follow the order set out in this checklist in your clearance application and use the numbering on any supporting documents.

- Checklist A
- Checklist B

**Further guidance**

You will find further help on company purchases of own shares in

- Checklist A
- Checklist B

- our Statement of Practice 2/82 (SP2/82) (PDF 1.4MB)
  Tax Bulletin 21

These give guidance on the statutory provisions (particularly the "trade benefit" test and 5 year period of qualifying ownership and on the contents and lay-out of applications).

- Tax Bulletin 80 explains the effect of Tax & Civil Partnership Regulations 2005

The law is at Sections 1033 to 1048 Corporation Tax Act 2010.
Clearance application checklist
Condition A: Purchase benefiting a company’s trade

1. Information about the company
   - 1.1 The name of the company making the purchase
   - 1.2 The company UTR
   - 1.3 Confirmation that the company is unquoted
   - 1.4 Confirmation that the company is a trading company or the holding company of a trading group
   - 1.5 Where the company is a member of a group, the names of the group companies together with their UTRs

2. Information about the payment
   - 2.1 Details of the shares to be purchased, the name of the present owner, the purchase price and the number of shares to be bought
   - 2.2 Details of any other transactions taking place between the company and the seller at or about the same time
   - 2.3 Confirmation that the company’s Articles of Association allow it to purchase its own shares
   - 2.4 Details of how the payment will be made

3. Information about the shareholders
   - 3.1 A list of the current shareholders in the purchasing company, showing for each person their current holdings including amount, class and dividend rights. Where appropriate include details for each company in the group (as per 1.5)
   - 3.2 Details of any relationships between the shareholders
   - 3.3 Where the shareholder is the son or daughter of another shareholder, confirmation that he or she is over 18 or else details of their age
3.4 Where the shareholder is a trust please provide details of the names of the trustees, the settlors, and the beneficiaries of the trust.

### 4. Information about the purpose

- **4.1** A statement of the reasons for the purchase, including the trading and any other benefits expected to accrue from it, whether or not to the purchasing company.

- **4.2** Confirmation that the purchase does not form part of a scheme or arrangement where the main purpose or one of the main purposes is to enable the owner of the shares to participate in the profits of the company without receiving a dividend, or for the avoidance of tax.

- **4.3** Confirmation that the seller will receive no other payment from the company, or details of any such payment to be made.

- **4.4** Particulars of any prior transactions or arrangements to be carried out in preparation for the purchase.

### 5. Information about the seller

- **5.1** The present residence status of the seller and any intended change.

- **5.2** The UTR or NI number of the seller, or if not known, his or her private address.

- **5.3** The period of beneficial ownership by the seller of the shares to be purchased and any other relevant holdings.

- **5.4(a)** Confirmation that the combined interests of the seller and any associates in the company will be substantially reduced, or,

- **5.4(b)** If the company is a member of a group, confirmation that the combined interests of the seller and any associates in the group will be substantially reduced.
5.5 Confirmation that the seller (after including any interests held by his associates) will not, immediately after the purchase, be connected with the company making the purchase or with any company which is a member of the same group as that company

6. Accounts and other financial information

The application should be accompanied by:

- 6.1 Copies of the latest available financial statements for the purchasing company
- 6.2 If appropriate, copies of the latest financial statements for the group and for any group companies
- 6.3 A note of any material relevant changes since the balance sheet date or confirmation that there are no changes
- 6.4 Details of any loan or current account which the seller maintains with the company or with any group company
### Clearance application checklist

**Condition B: Purchase in connection with IHT liability**

<table>
<thead>
<tr>
<th>1. Information about the company</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 1.1 The name of the company making the purchase</td>
<td></td>
</tr>
<tr>
<td>□ 1.2 The company UTR</td>
<td></td>
</tr>
<tr>
<td>□ 1.3 Confirmation that the company is unquoted</td>
<td></td>
</tr>
<tr>
<td>□ 1.4 Confirmation that the company is a trading company or the holding company of a trading group</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Information about the payment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ 2.1 Details of the shares to be purchased, the name of the present owner, the purchase price and the number of shares to be bought</td>
<td></td>
</tr>
<tr>
<td>□ 2.2 Details of any other transactions between the company and the seller at or about the same time</td>
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</tr>
<tr>
<td>□ 2.3 Confirmation that the company’s Articles of Association allow it to purchase its own shares</td>
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<tr>
<td>□ 2.4 Details of how the payment will be made</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>3. Information about the Inheritance Tax</th>
<th></th>
</tr>
</thead>
</table>
3.1 The name and date of death of the deceased

3.2 The reference of the deceased at the Capital Taxes Office

3.3 The amount of the outstanding tax and whether or not the liability has been agreed

3.4 The extent to which the purchase price is to be applied in satisfaction of the tax liability

3.5 A full explanation of the circumstances in which there would be ‘undue hardship’ if the tax liability were to be discharged otherwise than through the purchase of own shares from this or another such company

3.6 The UTR of the person to whom undue hardship would be caused, or if not known, the address of that person and their NI number

4. Accounts and other financial information

The application should be accompanied by:

4.1 Copies of the latest available financial statements for the purchasing company

4.2 If appropriate, copies of the latest financial statements for the group and for any group companies

4.3 A note of any material relevant changes since the balance sheet date or confirmation that there are no changes