
24 Loan relationships and derivative contracts: transfer-pricing rules

- (1) In section 446 of CTA 2009 (loan relationships: bringing transfer-pricing adjustments into account), after subsection (7) insert –
 - “(8) No credit is to be brought into account for the purposes of this Part to the extent that it corresponds to an amount which, as a result of the preceding provisions of this section, has not previously been brought into account as a debit.”
- (2) In section 693 of CTA 2009 (derivative contracts: bringing transfer-pricing adjustments into account), after subsection (5) insert –
 - “(6) No credit is to be brought into account for the purposes of this Part to the extent that it corresponds to an amount which, as a result of the preceding provisions of this section, has not previously been brought into account as a debit.”
- (3) The amendments made by this section have effect in relation to accounting periods beginning on or after 1 April 2016.
- (4) For the purposes of subsection (2), where the accounting period of a company begins before 1 April 2016 and ends on or after that date (the “straddling period”), so much of the straddling period as falls before that date, and so much of the straddling period as falls on or after that date, are to be treated as separate accounting periods.