



Syndicated Loan Scheme ('SLS')
Application by a Syndicate Manager of a new syndicate

- Please read the SLS Guidelines before completing this form. Give the details asked for in **Part A** below and follow the instructions in **Part B**. An officer or authorised signatory of your business should then sign at **Part C**.
- Send the completed form and supporting copy documents to **HM Revenue & Customs** ('HMRC') at the address below. If you wish, you may fax it to us. But please make sure to send us the original hard copy form and copies of the relevant documents.
- If your application is accepted HMRC will issue a formal Direction under Statutory Instrument 1970 No. 488 to the UK companies paying interest to your syndicate. This will direct them to make interest payments which include the appropriate amount of double taxation treaty relief.
- If you need any further information, please contact us:

**HM Revenue & Customs
LBS DT Treaty Team
Barkley House
Castle Meadow Road
Nottingham NG2 1BA**

Phone: 0115 974 0897

Fax: 0115 974 0666

*Do not use this form for a syndicate with lending members already covered by SI 1970 No. 488 Directions. See Section 11 of the Guidelines and apply on form **SLS-SM1A**.*

Part A

1(a) Your firm's name and address:

1(b) Name of the syndicate (if applicable) for which you are acting as Syndicate Manager.
Giving a name to a syndicate will help us to identify it in any correspondence.

1(c) Name and contact details of the person in your business handling this application.

2 Are you making this application **before** all the lending members of the syndicate are known?

Please ✓ Yes No

Enter a date so that HMRC can review

If 'Yes', on what date do you expect the syndicate to be complete?

3 Names and addresses of the UK corporate borrowers who will pay interest and

- their tax offices and references
- the amount of the loan attributable to each.

Attach a separate sheet if necessary.

4 Date of the loan

5 Amount borrowed /
maximum amount of facility

6 First interest payment date and
frequency thereafter

HMRC ref: _____

Part B

- List on separate sheets the names and addresses of the lending members of your syndicate, grouped in country-specific 'Blocks', detailing the individual percentage shares of the UK interest payments to which they are beneficially entitled. See Section 7 of the Guidelines. If the facility office of a lender is different from its country of residence, both should be given. A suggested format is at the foot of this page.
- Attach a copy of the loan agreement and any other loan documentation, *for example* Term Sheets or syndicate administration pro-formas. We will pass these on to the tax office(s) for the UK payer(s) when we deal with your application. See Section 16 of the Guidelines.

Part C

- On behalf of ourselves and all the members of the _____ syndicate I declare that we are authorised by all the parties to the syndicate to act in this matter, and that we understand and agree to the terms and conditions of the Syndicate Loan Scheme ('SLS'), as published in the SLS Guidelines.
- We understand that should, for any reason, double taxation treaty relief not be due to those lenders to the extent covered by this application, HMRC will require the UK borrower(s) to pay the tax (and any related liabilities) that may be due in respect of all payments already made. We undertake to make the UK borrower(s) fully aware of their contingent obligations. In the event that any contingent liability is realised, we will advise the borrower(s) as soon as possible that any payments should be made direct to HMRC.
- We undertake further to co-operate fully with HMRC in providing all information reasonably requested of us to help process the syndicate's application, and in pursuit of the Reporting and Review provisions of the Guidelines.
- We acknowledge that HMRC reserves the right to amend or withdraw any Direction issued under the SLS or to remove a loan from the operation of the scheme.

Signed _____ **Date** _____

Position _____

Format for listing by 'Blocks' the lending members of a Syndicate

Each list or Block should be preceded by the name of the syndicate and a statement to the effect that:

"The following are lending members of the syndicate who have been represented to the Syndicate Manager as being

resident in(name of country), **or**
resident in the UK but being banks within the meaning of Section 991 Income Tax Act 2007, **or**
resident in the UK (other than Section 991 banks)."

This should be followed by a list of the appropriate lending members, detailing their complete names and addresses (together with full details of any relevant facility office, if different).