

Amendment 16 to Schedule 16: Multinational top-up tax: transitional provision

Summary

1. This amendment is a consequential amendment to Schedule 16 and clarifies the application of the anti-avoidance provisions in relation to intra-group transfers.

Details of the amendment

2. This amendment replaces the reference to “the beginning of the commencement period” from paragraph 2, subparagraph (3)(a), with a reference to the “relevant time”.
3. The effect of this amendment is to ensure that the value of assets taken into account for the purposes of the anti-avoidance rule which covers intra-group transfers in the transitional period is the value immediately before any transfer, adjusted as necessary.
4. This is a consequential amendment which is necessary as a result of other changes to the application of the anti-avoidance provisions in paragraph 2.

Background note

5. This consequential amendment amends paragraph 2 of Schedule 16 of the new multinational top-up tax regime in order to ensure that the transitional anti-avoidance provisions operate as intended.