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Changes to legislation: There are currently no known outstanding effects for the Finance Act 2019, Paragraph 4. (See end of Document for details)

## SCHEDULES

#### SCHEDULE 20

### TAXATION OF HYBRID CAPITAL INSTRUMENTS

### PART 2

CORPORATION TAX, INCOME TAX AND CAPITAL GAINS TAX

Distributions in respect of hybrid capital instruments

- In section 1015 of CTA 2010 (meaning of "special securities") after subsection (1) insert—
  - "(1A) But hybrid capital instruments (within the meaning of section 475C of CTA 2009) are not special securities by reason of meeting condition E."

# **Changes to legislation:**

There are currently no known outstanding effects for the Finance Act 2019, Paragraph 4.