

SCHEDULES

SCHEDULE 4

AVOIDANCE INVOLVING PROFIT FRAGMENTATION ARRANGEMENTS

Commencement

- 12 This Schedule has effect—
- (a) for income tax purposes, in relation to any value transferred on or after 6 April 2019 as a result of a material provision, and
 - (b) for corporation tax purposes, in relation to any value transferred on or after 1 April 2019 as a result of a material provision.