

# Investment trust companies: next steps

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December 2008



HM TREASURY





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# 1

## Introduction

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**1.1** The issue of the taxation of Investment Trust Companies (ITCs) was the subject of a report published in October 2007 by the Association of Investment Companies entitled “Delivering lower costs and innovation in pooled investments”. The report argued that the UK tax rules were acting as a barrier to ITCs being established in the UK. The report identified the main issue with the tax rules as being the absence of a tax-efficient method for UK based ITCs to invest in bonds. Following that report, Budget 2008 announced that the Government would consider proposals to adapt the tax rules for Investment Trust Companies to enable tax-efficient investment in a wider range of assets. In July 2008 the Government then published *Investment Trust Companies: a tax framework*<sup>1</sup> setting out how it intended to take the issue forward and invited industry’s views on the proposed framework.

**1.2** The framework will enable ITCs to invest in interest producing assets tax efficiently. It achieves this by moving the point of taxation for interest bearing assets from the ITC to the shareholder, with the result that shareholders face broadly the same tax treatment as they would have had they owned the interest bearing asset directly. This is one of a package of measures designed to maintain the position of the UK as a competitive location for asset management.

**1.3** The Government’s key objectives are to:

- allow UK based ITCs to invest tax-efficiently in bonds and other interest producing assets;
- ensure that UK investors continue to choose their investments for commercial rather than tax reasons;
- prevent unintended tax advantages being gained through investing in an ITC rather than direct investment; and
- implement the framework at no overall increase in cost to the UK Exchequer.

**1.4** The Government is grateful for and has carefully considered the responses to the tax framework.

**1.5** The purpose of this document is to provide:

- a summary of the responses received to the framework and the Government’s reaction to the key issues that were raised; and
- draft regulations which deliver the proposals that were set out in *Investment Trust Companies: a tax framework*.

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<sup>1</sup> HM Treasury, July 2008.

**1.6** Subject to the responses, the Government intends to include powers in Finance Bill 2009 to legislate for the draft regulations and for these to take effect as soon as possible after Royal Assent to Finance Bill 2009. They will then apply to accounting periods that begin on or after that date.

**1.7** Interested parties should send their comments on the draft regulations by Wednesday 11 February 2009 to:

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Assets, Savings and Wealth Team

HM Treasury

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London

SW1A 2HQ

Tel: +44 (0) 207 270 6031

Email: sue.harper@hm-treasury.gov.uk.

## **Confidentiality disclosure**

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

# 2

## Summary of responses

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**2.1** The Government is grateful for the comments received from interested parties in respect of *Investment Trust Companies: a tax framework* published in July 2008. The Government recognises the industry's strong support for the proposal to enable ITCs to invest tax-efficiently in interest bearing assets.

**2.2** A summary of the key issues arising from the responses is detailed in this chapter. A list of respondents to the tax framework can be found in Annex B of this document.

### Optional regime

**2.3** Respondents welcomed the Government's proposals for an optional regime. Draft regulation 4 sets out when an investment trust can opt to make interest distributions.

**2.4** In addition, some respondents questioned when an ITC would need to inform HM Revenue & Customs (HMRC) of its intention to stream.

**2.5** The Government believes that an ITC should inform HMRC that it has or wishes to stream interest income at the same time as it submits its application for approval as an investment trust for the accounting period.

### Interest investment income

**2.6** Respondents welcomed the proposal to allow ITCs to invest tax efficiently in interest bearing assets by 'streaming' interest income. As set out in the framework, the interest income will remain taxable in the ITC. The interest distribution will then be deductible from corporation tax when paid to shareholders as an 'interest distribution'.

### Order of distribution

**2.7** Some respondents questioned whether it would be necessary to distribute interest income in priority to other income.

**2.8** The Government does not intend to include rules to determine the order of a distribution. This decision will be made by each ITC that opts to make interest distributions.

**2.9** Several respondents suggested that interest income should be carried forward and paid to investors in subsequent periods as an interest distribution. The Government believes that this would provide people who invested in ITCs with a tax advantage over people who invested in interest bearing assets directly. As set out in paragraph 1.14 of the tax framework, any interest income not distributed will be subject to corporation tax in the ITC. The carried forward amount should then be distributed as a dividend in a subsequent accounting period (see draft regulation 8(1)). This mirrors the tax treatment for ITCs that do not opt to make interest distributions.

## Definition of interest

**2.10** Respondents asked how interest bearing assets would be defined. Draft regulation 8 sets out the Government's proposals for the definition of interest producing assets.

## Gross payment of interest

**2.11** Mixed responses were received about the administrative requirements of gross and net payments of interest to shareholders.

**2.12** The Government is mindful that the requirement for gross and net payments will result in an administrative cost for ITCs, but believes that the optional nature of the regime means that ITCs will only opt in if they believe that the benefits will outweigh the costs.

## Interest distributions made before an ITC gains approval

**2.13** The Government envisages that, if a company wants to make an interest distribution before it gains approval as an investment trust for that accounting period, it must have a reasonable belief that it will gain approval as an investment trust and intend to apply for that status at the time it makes the distribution. This is set out in draft regulation 4. HMRC will provide guidance on how a company will be able to demonstrate reasonable belief. For example, such a belief might be demonstrated through records of matters reviewed by the board before deciding to make an interest distribution, including whether the company was on course to qualify as an investment trust.

**2.14** The draft regulations also deal with the situation in which a company could deduct interim interest distributions from their liability to corporation tax and then fail to gain approval as an investment trust for that accounting period. Draft regulation 12(2) provides that, in this circumstance, the interest distribution made will not be tax deductible in the company. However, in order to ensure that shareholders have certainty of tax treatment, shareholders will not be required to reclassify the distribution they received as a dividend. These rules will not apply if, at the time the interim interest distribution was made, the company had a reasonable belief that it would obtain approval as an investment trust and intended, at that time, to apply for approval.

## Transitional provisions

**2.15** Respondents who addressed the matter of transitional provisions did not believe that they would be necessary, subject to the specific details of the regime. The Government does not intend to introduce transitional provisions.

# A Draft regulations

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**A.1** The draft regulations deliver the proposals set out in *Investment Trust Companies: a tax framework*. Subject to the comments on the draft regulations, the Government intends to legislate in Finance Bill 2009 for the appropriate power to make the regulations. The regulations will then take effect as soon as possible after Royal Assent to Finance Bill 2009.

**A.2** The numbering of these draft Regulations is a temporary system and will be renumbered before being published in final form.

**A.3** The Government invites comments on the draft regulations by Wednesday 11 February 2009.

**2009 No.**

**INCOME TAX**

**CORPORATION TAX**

**The Investment Trust Companies (Dividends: Optional  
Treatment As Interest Distributions) Regulations 2009**

<i>Made</i>	- - - -	***
<i>Laid before House of Commons</i>		***
<i>Coming into force</i>	- -	***

The Treasury make the following Regulations in exercise of the powers conferred by sections [\*\*\*] of the Finance Act 2009(a).

**PART 1**

**Preliminary provisions**

**Citation, commencement and effect**

**1.**—(1) These Regulations may be cited as the Investment Trust Companies (Dividends: Optional Treatment As Interest Distributions) Regulations 2009 and shall come into force on [date].

(2) These Regulations have effect in relation to accounting periods beginning on or after [date].

**Structure of these Regulations**

**2.** The structure of these Regulations is as follows—

this Part contains preliminary provisions of an introductory nature;

Part 2 deals with the optional treatment of dividends as interest distributions; and

Part 3 deals with the duty to deduct tax from interest distributions.

**Interpretation**

**3.** In these Regulations—

“ICTA” means the Income and Corporation Taxes Act 1988(b);

“interest distribution” has the meaning given in regulation 5(2);

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(a)  
(b) 1988 c. 1.

“investment trust” means an investment trust within the meaning of section 842(1) of ICTA(a);

“period of account” has the meaning given in section 832(1) of ICTA(b);

“prospective investment trust” has the meaning given in regulation 4(2); and

“qualifying interest income” means the amount determined in accordance with regulation 8.

## PART 2

### Investment trusts: optional treatment of dividends as interest distributions

#### Circumstances in which dividends may be treated as interest distributions

4.—(1) Subject to paragraph (3), regulation 5 applies where—

- (a) a company is an investment trust or a prospective investment trust as respects an accounting period;
- (b) an amount is distributed by the company as a dividend in respect of a period of account which includes that accounting period; and
- (c) the amount distributed in relation to the period of account is not distributed after the first anniversary of the day on which that period of account ends.

(2) A company is a prospective investment trust as respects an accounting period if—

- (a) it intends to seek approval under section 842 of ICTA (investment trusts) as respects the accounting period, and
- (b) it has a reasonable belief that such approval will be gained.

(3) In a case where an amount is distributed by the company as a dividend in respect of a period of account which includes two or more accounting periods of the company, the company must be an investment trust or prospective investment trust as respects all of those accounting periods.

#### Treatment of dividends as interest distributions

5.—(1) Where this regulation applies the company may designate as an interest distribution all or part of the amount distributed as a dividend or dividends in respect of the period of account which includes the accounting period.

(2) A dividend, or part of a dividend, in respect of which a designation under this regulation has been made is referred to in these Regulations as an “interest distribution”.

(3) A designation under paragraph (1) becomes irrevocable at the time the interest distribution is made.

(4) The aggregate of the amounts distributed as interest distributions in relation to an accounting period may not exceed the amount of the company’s qualifying interest income for the accounting period (see regulation 8 below).

(5) For the purposes of paragraph (4), where an interest distribution is made in respect of a period of account which includes more than one accounting period the amount distributed as the interest distributions in relation to each accounting period is—

$$\frac{AxI}{T}$$

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(a) Section 842(1) was amended by section 117(1) of the Finance Act 1988 (c. 39); paragraphs 43 and 56 of Schedule 25 to the Finance Act 2002 (c. 23); section 143 of the Finance Act 2006 (c. 25); paragraph 7(9) of Schedule 26 to the Finance Act 2007 (c. 11) and paragraph 228 of Schedule 1 to the Income Tax Act 2007 (c. 3). Section 842 was also amended by section 55 of the Finance Act 1990 (c. 29); paragraph 14(55) of Schedule 10 to the Taxation of Chargeable Gains Act 1992 (c. 12); paragraph 8 of Schedule 17 to the Finance Act 1994 (c. 9); paragraphs 4(7) and 8(4) of Schedule 9, and Part 3(2) of Schedule 40, to the Finance Act 2002; section 45(4) of the Finance Act 2004 (c. 12) and section 57(3) of the Finance Act 2007.

(b) The definition of “period of account” was inserted by section 103(1) and (6) of the Finance Act 2002.

where—

“*A*” is the amount of qualifying interest income for the accounting period;

“*T*” is the total of the amounts distributed as interest distributions in respect of the period of account; and

“*T*” is the total amount of the qualifying interest income in respect of all the accounting periods in the period of account.

### **Information relating to distributions**

6.—(1) Where an amount is distributed as an interest distribution, section 234A of ICTA (information relating to distributions: further provisions)(a) shall apply as if the amount distributed were a payment of interest which is not a qualifying distribution.

(2) Where subsection (6) of section 234A applies by virtue of paragraph (1) and subsection (7) of that section also applies in relation to the same person, the company may provide a single written statement showing the details required by those subsections.

### **Notification of designation of dividends as interest distributions**

7. Where a company makes a designation under regulation 5, the application by the company for approval as an investment trust under section 842 of ICTA as respects the accounting period to which the designation relates must include details of the total amount distributed, or to be distributed, as interest distributions in respect of the accounting period.

### **Qualifying interest income**

8.—(1) The company’s amount of qualifying interest income for an accounting period is the amount by which the aggregate of the company’s relevant credits exceeds the aggregate of the company’s relevant debits given for that period.

(2) Subject to paragraph (3), the company’s relevant credits and relevant debits are—

(a) credits and debits given for the accounting period for the purposes of Part 5 of the Corporation Tax Act 2009 (loan relationships)(b); and

(b) credits and debits given for the accounting period for the purposes of Part 7 of that Act (derivative contracts) in relation to—

(i) derivative contracts whose underlying subject matter consists wholly of assets representing loan relationships or currency or both, and

(ii) contracts for differences whose underlying subject matter consists wholly of any one or more of interest rates, creditworthiness and currency.

(3) The company’s relevant debits for an accounting period do not include debits arising under regulation 9 in respect of interest distributions made in respect of the accounting period.

(4) If, in relation to an accounting period, the aggregate of the company’s relevant debits exceeds the aggregate of the company’s relevant credits the amount of the qualifying interest income for that period shall be treated as nil.

(5) In this regulation, expressions used in Parts 5 and 7 of the Corporation Tax Act 2009 have the same meaning as they have in those Parts.

### **Effect of paying interest distribution: investment trust**

9.—(1) This regulation applies if—

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(a) Section 234A was inserted by section 32(4) of the Finance (No. 2) Act 1992 (c. 48) and amended by paragraphs 2 and 7 of Schedule 37 to the Finance Act 1996 (c. 8).

(b) 2009 c. [ ]

- (a) the company is an investment trust as respects the accounting period at the time an interest distribution is made in respect of a period of account which includes that accounting period, or
- (b) the company subsequently becomes an investment trust as respects the accounting period in relation to which an interest distribution is made.

(2) Subject to paragraph (3), where this regulation applies, the Tax Acts have effect in relation to the company as if the interest distributions made by the company in relation to the accounting period were interest under a debtor relationship of the investment trust.

(3) Paragraph (2) only applies to the extent that the aggregate of the amount distributed as interest distributions in relation to the accounting period does not exceed the amount of the company's qualifying interest income for that period.

(4) In paragraph (2), "debtor relationship" has the same meaning as in [section 300(6)] of the Corporation Tax Act 2009 (loan relationships).

#### **Effect of paying interest distribution: recipient chargeable to corporation tax**

**10.**—(1) In relation to an interest distribution made to a recipient within the charge to corporation tax, the Tax Acts have effect as if the interest distribution were interest under a creditor relationship of that person.

(2) In paragraph (1), "creditor relationship" has the same meaning as in [section 300(5)] of the Corporation Tax Act 2009 (loan relationships).

#### **Effect of paying interest distribution: recipient chargeable to income tax**

**11.** In relation to an interest distribution made to a recipient within the charge to income tax, the Tax Acts have effect as if the interest distribution were a payment of yearly interest on the date the distribution is made.

#### **Failure to obtain approval as an investment trust: position of company**

**12.**—(1) This regulation applies in relation to a company if—

- (a) a company has made an interest distribution at a time before it is approved under section 842 of ICTA (investment trusts) as an investment trust as respects the accounting period, to which the interest distribution relates, and
- (b) the company is subsequently not approved, or does not obtain approval, as an investment trust for the purposes of that section as respects that accounting period.

(2) Any amount distributed as, or purported to be, an interest distribution shall be treated for the purposes of the Tax Acts as a dividend paid at the time the distribution is made and shall not be treated as interest payable under a debtor relationship of the company (see regulation 9(2) above).

(3) But paragraph (2) does not apply if, at the time the distribution is made, the company—

- (a) had a reasonable belief that it would obtain approval as an investment trust (see regulation 4(2) above), and
- (b) intended at that time to apply for approval under section 842 of ICTA,

in which case, the amount distributed by the company as an interest distribution in relation to the accounting period shall be treated by the company as an interest distribution notwithstanding that the company is not approved as an investment trust as respects that period.

(4) No amount may be distributed as an interest distribution by the company in relation to an accounting period after the time the company is informed by the Commissioners for Her Majesty's Revenue and Customs that approval for the purposes of section 842 of ICTA is not given by them as respects that accounting period.

### **Amounts distributed as interest distributions: position of recipient**

13. Where a recipient of an amount distributed by a company is—
- (a) informed that the amount is distributed to the recipient as an interest distribution, and
  - (b) so informed at the time the amount is distributed,

the recipient shall treat that amount as an interest distribution whether or not the amount distributed is an interest distribution for the purposes of the Tax Acts in relation to the company.

## **PART 3**

### **Duty to deduct tax from interest distributions**

#### **Duty to deduct tax from interest distributions: general**

14.—(1) Any obligation to deduct a sum under section 874(2) of the Income Tax Act 2007<sup>(a)</sup> is subject to the provisions of this regulation.

(2) In this Part the “deduction obligation” means the obligation specified in paragraph (3).

(3) The deduction obligation does not apply to the interest distribution if—

- (a) the recipient is a company (whether or not the company is resident in the United Kingdom for tax purposes);
- (b) the recipient consists of the trustees of a unit trust scheme;
- (c) the reputable intermediary condition in regulation 15 is met with respect to the recipient on the date the interest distribution is made; or
- (d) the residence condition in regulation 18 is met with respect to the recipient on the date the interest distribution is made.

(4) But if the recipient is a company acting in the capacity of a trustee of a trust, the deduction obligation is not excluded by virtue of paragraph (3)(a).

(5) In this regulation, “unit trust scheme” has the meaning given by section 237 of the Financial Services and Markets Act 2000<sup>(b)</sup>.

#### **The reputable intermediary condition**

15.—(1) The reputable intermediary condition is met with respect to a recipient on the date the interest distribution is made if conditions A to C are met.

(2) Condition A is that the interest distribution is made on behalf of the recipient to a company.

(3) Condition B is that the investment trust or prospective investment trust making the interest distribution has reasonable grounds for believing that the recipient is not ordinarily resident in the United Kingdom.

(4) Condition C is that the company mentioned in paragraph (2)—

- (a) is subject to the EC Money Laundering Directive,
- (b) is subject to equivalent non-EC provisions, or
- (c) is a company which—
  - (i) is resident in a regulated country or territory, and
  - (ii) is an associated company of a company which is subject to sub-paragraph (a) or (b).

#### **The reputable intermediary condition: further provisions**

16.—(1) This regulation applies for the purposes of Condition C in regulation 15.

<sup>(a)</sup> 2007 c. 3; section 874(2) was amended by paragraph 26 of Schedule 1 to the Finance Act 2008 (c. 9).

<sup>(b)</sup> 2000 c. 8.

(2) A company is subject to the EC Money Laundering Directive if it is a credit institution or financial institution as defined by Article 1 of Directive 91/308/EEC<sup>(a)</sup>, as amended by Directive 2001/97/EC<sup>(b)</sup>.

(3) A company is subject to equivalent non-EC provisions if it is required by law of any country or territory which is not a member state to comply with requirements similar to those which, under Article 3 of Directive 91/308/EEC (as so amended), member States must ensure are complied with by credit institutions and financial institutions.

(4) A country or territory is a regulated country or territory if it either is a member State or imposes requirements similar to those, which, under Article 3 of that Directive (as so amended), member States must ensure are complied with by credit institutions and financial institutions.

(5) A company is to be treated as another's associated company if it would be so treated for the purposes of Part 11 of ICTA (see section 416 of that Act).

### **The reputable intermediary condition: consequences of reasonable but incorrect belief**

17.—(1) This regulation applies if conditions A to D are met.

(2) Condition A is that an interest distribution is made by an investment trust or prospective investment trust.

(3) Condition B is that the investment trust or prospective investment trust, in reliance on the reputable intermediary condition being met with respect to the recipient of the interest distribution, does not comply with the deduction obligation in relation to the interest distribution.

(4) Condition C is that the deduction obligation would apply but for the reputable intermediary condition being met.

(5) Condition D is that (contrary to the belief of the investment trust or prospective investment trust) the recipient is in fact ordinarily resident in the United Kingdom.

(6) Where this regulation applies section 874 (duty to deduct from certain payments of yearly interest) and Chapter 15 of Part 15 (collection: deposit-takers, building societies and certain companies) of the Income Tax Act 2007 have effect as if the deduction obligation applied.

### **The residence condition**

18.—(1) The residence condition is met with respect to a recipient on the date the interest distribution is made if any of conditions A to E is met.

(2) Condition A is that, in relation to an interest distribution which is not made to or received under a trust, there is a valid declaration, made by the recipient, that the recipient is not ordinarily resident in the United Kingdom.

(3) Condition B is—

(a) that the recipient receives the interest distribution as the personal representative of a deceased person, and

(b) that the deceased person had made a declaration, which was valid at the time of the deceased person's death, that the deceased person was not ordinarily resident in the United Kingdom.

(4) Condition C is—

(a) that the recipient receives the interest distribution as a personal representative of a deceased person, and

(b) that the personal representative has made a declaration that the deceased, immediately before the time at which the deceased died, was not ordinarily resident in the United Kingdom.

(5) Condition D is that, in the case of an interest distribution made to or received under a trust where the whole of the income is, or falls to be treated as, or under any provision of the Tax Acts

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(a) OJ L 166, 28.6.1991, p.77-83.

(b) OJ L 344, 28.12.2001, p.77-82.

is deemed to be, the income of a person other than the trustees of that trust, there is a valid declaration, made by the person in question that the person is either not ordinarily resident or, in the case of a company, not resident in the United Kingdom.

(6) Condition E is that, in circumstances in which condition D does not apply and with respect to a recipient in the case of an interest distribution made to or received under a trust, there is a valid declaration, made by the trustees of that trust, that—

- (a) the trustees are not resident in the United Kingdom, and
- (b) each beneficiary of the trust is either not ordinarily resident or, in the case of a beneficiary which is a company, not resident in the United Kingdom.

### **The residence condition: declarations**

**19.**—(1) A declaration for the purposes of regulation 18 must—

- (a) be in such form as may be required or authorised by the Commissioners for Her Majesty's Revenue and Customs;
- (b) be made in writing to the investment trust or prospective investment trust making the interest distribution in question; and
- (c) contain any details or undertakings required by paragraphs (2) to (4).

(2) A declaration made for the purposes of condition A or B in regulation 18 must contain—

- (a) the name and principal residential address of the person making it; and
- (b) an undertaking that the investment trust or prospective investment trust will be notified by that person if the person becomes ordinarily resident in the United Kingdom.

(3) A declaration made for the purposes of condition C in regulation 18 must contain the name of the deceased and the principal residential address of the deceased immediately before the time at which the deceased died.

(4) A declaration made for the purposes of condition D or E in regulation 18 must contain—

- (a) the names and principal residential addresses of the trustees of the trust or, in the case of a trustee which is a company, the name of the company and the address of its registered or principal office;
- (b) the names and principal residential addresses of the beneficiaries of the trust or, in the case of a beneficiary which is a company, the name and address of its registered or principal office; and
- (c) an undertaking that the trustees of the trust will notify the investment trust or prospective investment trust if—
  - (i) they become resident in the United Kingdom,
  - (ii) any beneficiary of the trust named in the declaration becomes ordinarily resident or, in the case of a company, resident in the United Kingdom, or
  - (iii) any person who becomes a beneficiary of the trust after making the declaration either is at the time of becoming a beneficiary, or subsequently becomes, ordinarily resident or, in the case of a company, resident in the United Kingdom.

### **References to beneficiaries in regulations 18 and 19**

**20.** In regulations 18 and 19 references to a beneficiary are references to any person who is known to the trustees of the trust to be either—

- (a) a person who is, or will, or may become, entitled to any income of the trust, whether in the form of income or not, or
- (b) a person to whom any such income may be paid, or for whose benefit any such income may be applied, whether in the form of income or not, in the exercise of a discretion by the trustees.

**Interest distributions: declarations and position of investment trust or prospective investment trust**

21.—(1) For the purposes of determining whether an interest distribution should be made with or without any deduction required by the deduction obligation, an investment trust or prospective investment trust is entitled to treat a declaration made for the purposes of regulation 19 as valid.

(2) But the investment trust or prospective investment trust may not treat the declaration as valid if condition A or B is met.

(3) Condition A is that the investment trust or prospective investment trust receives a notification in compliance with an undertaking under regulation 19 that a person in question has become resident or ordinarily resident in the United Kingdom.

(4) Condition B is that the investment trust or prospective investment trust comes into possession of information by some other means which indicates that such a person is or may be resident or ordinarily resident in the United Kingdom.

*Name*

*Name*

Date

Two of the Lords Commissioners of Her Majesty's Treasury

**EXPLANATORY NOTE**

*(This note is not part of the Regulations)*

[To follow]



# B

## List of respondents

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**B.1** The Government is grateful to the organisations listed below for their responses to *Investment Trust Companies: a tax framework*

- Aberdeen Asset Managers Limited
- Ashurst
- Association of Investment Companies
- Baillie Gifford
- BNP Paribas Securities Services
- Caledonia Investments
- Deloitte
- Ernst & Young
- F&C Asset Management plc
- F&C Capital and Income Investment Trust PLC
- Grant Thornton
- Henderson Global
- Henderson High Income Trust PLC
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