# Advanced Topics in Revenue Law

## Corporation Tax; International and European Tax; Savings; Charities

### John Tiley, CBE, QC (Hon), FBA, LLD

Emeritus Professor of the Law of Taxation and Fellow of Queens' College, University of Cambridge and

### Glen Loutzenhiser, DPhil

Pinsent Masons University Lecturer in Tax Law and Fellow of St Hugh's College, University of Oxford



OXFORD AND PORTLAND, OREGON 2013

### Contents

Preface	v
List of Abbreviations	x
Table of Casesxii	ii

#### PART I: CORPORATION TAX

l.	Corporation Tax—Introduction, History and Policy	3
2.	Structure	
3.	Distributions	47
4.	Computation (1): General Rules	66
5.	Computation (2): Accounting-based Rules for Specific Transactions	99
6.	Capital Allowances	131
7.	Groups and Consortium Companies: General	193
8.	Control, Groups and Consortium Companies: Capital Gains	
9.	Exempt Distributions: Demergers	226
10.	Close Companies	231
11.	Employee Share Schemes	243
12.	Anti-avoidance: Special Provisions	275

#### PART II: INTERNATIONAL AND EUROPEAN UNION TAX

13.	International Tax: Prologue and Connecting Factors	
14.	Enforcement of Foreign Revenue Laws	
15.	UK Residents and Foreign Income	
	Source: The Non-resident and the UK 'Tax System	
17.	Controlled Foreign Companies Resident in Low Tax Areas	
18.	Capital Gains	404
19.	Unilateral Relief Against Double Taxation	
	Double Taxation: UK Treaty Relief	
	European Union Tax Law	

### PART III: TAX-PREFERRED SAVINGS

22.	Favoured Methods	501
23.	Investment Intermediaries	515
24.	Pensions	538

#### PART IV: CHARITIES

25.	Charities .	5	567
Inde	x		