

Treatment of connected person and accommodating party

- 99.** For the purposes of this Chapter, in determining whether a tax benefit exists—
- (i) the parties who are connected persons in relation to each other may be treated as one and the same person;
 - (ii) any accommodating party may be disregarded;
 - (iii) such accommodating party and any other party may be treated as one and the same person;
 - (iv) the arrangement may be considered or looked through by disregarding any corporate structure.