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**Date** 11 October 2016

**Our ref**

Dear Ms Nathan

### **Mixed Partnerships and TCGA 1992 section 162**

Thank you for your letter of 20 September.

I have consulted with policy colleagues regarding this issue and they do not propose extending s162 relief to include the incorporation of a mixed partnership to an existing corporate partner.

Yours sincerely

**Katherine Acton**  
Technical Adviser

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