HMRC - STSM031090 - Scope Of Stamp Duty Reserve Tax (SDRT): Chargeable Securities - General

The principal charge to Stamp Duty Reserve Tax (SDRT) applies where there is an agreement to transfer chargeable securities.

‘Chargeable securities’, as defined in FA86/S99, include:

stocks, shares or loan capital

interests in, or in dividends or other rights arising out of securities

options to acquire and rights to allotment of or to subscribe for securities

units under a unit trust scheme

‘Chargeable securities’ as defined in FA1986/S99 do not include:

securities which are exempt from all stamp duties

securities which relate to underlying securities which are exempt, such as gilts and non-convertible loan capital

loan capital where the return bears an inverse relationship to results

interests in depositary receipts for stocks or shares, which will instead be subject to the 1.5 per cent charge

are issued or raised by a company incorporated outside the UK (and with no UK register)

are not paired with shares in a UK company (FA86/S99 (4))

are issued or raised by a Societas Europaea (SE) with a registered office outside the UK (FA86/S99 (4A))

units in a non-UK or exempt trust.