

**Comprehensive Table of Adjustments**

Act	Part	Topic	In summary table	Arriving at taxable profit				Reliefs operating other than in arriving at taxable profit	Provisions about handling losses
				Provisions broadly aligning tax with accounting	Affects generality of/many businesses	Could be affected by Schedular reform	Specialised contexts or sectors		
CTA09	Part 3	Trading income	y						
CTA09	41	Rules relating to a trading company starting or ceasing to be within the charge to corporation tax in respect of a trade.				y			
CTA09	46	Profits of trade to be calculated in accordance with GAAP subject to any adjustment required by tax law. Origin s42 FA 1998 putting into statutory form the line of case-law beginning with Usher's Wiltshire Brewery Ltd v Bruce (1914) 6 TC 399.	y	y	y				
CTA09	54(1)(a)	No deduction for expenses not wholly and exclusively for trade purposes. Historical. S100 ITA 1842.	y		y	y			
CTA09	54(1)(b)	No deduction for a loss not connected with the trade. Historical. S100 ITA 1842.	y		y	y			
CTA09	53	No deduction for capital expenditure. Historical. Goes back to S100 ITA 1842.	y						
CTA09	55	No deduction for non-money debt etc. FA1996 Loan Relationship rules. Per CFM 30120 a reform to bring the computation of the taxable profits of corporate finance into line with the accounting profit.		y	y				
CTA09	56	Restriction of deduction for hire of environmentally unfriendly cars. FA 2009- to encourage use of environmentally friendly cars.							
CTA09	59	No deduction for patent royalties. A royalty or other sum paid in respect of the use of a patent is paid under deduction of tax. Accordingly no such sum is deductible in computing trading profits. This provision goes back to at least ITA 1918 Rule 3(m) of the Rules relating to Schedule D.	y			y			
CTA09	60	No deduction for expenditure on "integral features". Repeats s33A(3) CAA 2001, introduced by FA 2008 as part of the package of Capital Allowances reforms in that year. New category, per Simon B3.345.	y		y				
CTA09	61	Pre-trading expenses. Limited allowance for expenditure which, had it been incurred in the course of trading, would have been allowable e.g. rent and rates of premises to be used for the purposes of the trade and employees' wages. Origin s39 FA 1980.	y	y		y			
CTA09	62 - 65	Deductions available to a trader who uses land in connection with the trade where the land is subject to a taxed lease. Originally s87 ICTA 1970 which had its origins in FA 1963 on the abolition of "old" Schedule A and the introduction of Schedule D Case VIII. Restrictions apply.	y		y				
CTA09	69	Deduction for a payment given for a restrictive undertaking where that payment is taxable on the recipient as employment income under s225 ITEPA. Origin s73(2) FA 1988. Effectively reverses Associated Portland Cement Manufacturers v Kerr (1945) 27 TC 103 given that the payment is taxable on the employee or former employee.		y					
CTA09	70	Deduction for expenses incurred by an employer where an employee is seconded temporarily to a charity or an educational establishment. Origins s28 FA 1983 and s34 FA 1987. To encourage particular behaviour.					y		
CTA09	72	Deduction for a contribution to expenses incurred by an agent in relation to a payroll giving scheme (GAYE). Origin s69 FA 1993. To encourage particular behaviour.			y				
CTA09	73 - 75	Deduction for counselling and retraining expenses. Such expenses would normally be deductible when the services are provided to a current employee. S73 et seq. ensure that the expenses are allowable when the services are provide to a former employee or to a current employee who is about to become a former employee.				y			
CTA09	76	Redundancy payments and approved contractual payments; if conditions met, s77 to 79 apply - each section has a separate set of conditions to be met for a payment to be deductible (several restrictions apply). Partially reverses CIR v Anglo- Brewing Ltd (1925) 12 TC 803.	y			y			
CTA09	79	Restrictions on additional payments made by the employer who permanently ceases to carry on a trade or part of a trade. Additional rules for Partnerships and when payments made by a local Government.			y	y			
CTA09	82	Contributions to local enterprise organisations or urban regeneration companies - deductible only if conditions met.					y		
CTA09	86	Contributions to flood and coastal erosion risk management projects - deductible if conditions met.					y		

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CTA09	87	Expenses of research and development - deductible but exceptions apply.	y		y				
CTA09	88	Payments to research associations, universities etc. - deductible but restrictions apply.					y		
CTA09	89 - 90	Deduction for fees and expenses on obtaining or renewing grants of patents, trade marks etc. For most expenses in relation to patents s89 is overridden by the Intangible Assets regime (ss711- 906 CTA 2009).					y		
CTA09	91	Payments to Export Credits Guarantee Department - deductible if conditions met.					y		
CTA09	92	Levies etc. under FISMA 2000 - deductible if conditions met.					y		
CTA09	92A	Deductions in relation to salaried members - a deduction is allowed for expenses paid by the partnership in respect of M's employment under section 1273A(2) if no deduction would otherwise be allowed for the payment (subject to s53-54, s1298, s1302).		y		y			
CTA09	93	Capital receipts to be excluded in computing the profits of a trade. Puts into statutory form the line of case-law beginning with <i>Glenboig Union Fireclay Co Ltd v CIR (1922) 12 TC 427</i> .	y		y				
CTA09	94	Where a deduction has been given for an expense giving rise to a trade debt, and that debt is later released, the debt is treated as a trading receipt. Origin s36 FA 1960. Reverses <i>British Mexican Petroleum Co Ltd v Jackson (1932) 16TC 570</i> Accounting treatment at that time was that the amount released was taken to the balance sheet as a reserve.	y	y	y	y			
CTA09	95	Sums received by the transferee of a trade which arise from the transferor's carrying on of the trade are taxable as trading receipts of the transferee. Origin s33 FA 1960 and s18 and Sch 10 FA 1963. Enacted to remedy a defect in the legislation.	y	y	y	y			
CTA09	96	Reverse premium to be taxed as a trading receipt. Origin Sch 6 para 1 FA 1999. Blocking a loophole. Absent this legislation the receipt would be tax-free in the hands of the tenant but the payer- typically a developer- would get a Case I deduction.	y	y	y	y			
CTA09	101	If a deduction has been made in calculating the profits of a trade for a payment to a mutual concern for the purposes of its mutual business, then if certain conditions are met, money received is brought into account as a receipt; restrictions apply.					y		
CTA09	102	Industrial development grants brought into account if certain conditions met.					y		
CTA09	103	Sums recovered under insurance policies etc. - brought into account but only up to the amount of the deduction.	y		y	y			
CTA09	104	A payment made to a trader under Financial Services and Markets Act 2000 is a trading receipt. This is the counterpart to s92 CTA 2009 specifically allowing a deduction for a payment made by a trader under FISMA 2000.					y		
CTA09	104A - 104Y	R&D expenditure credits - the amount of the R&D expenditure credit to which a company is entitled is the relevant percentage of the amount of the company's qualifying R&D expenditure for the period (percentage is specified by the legislation and subject to change).						y	
CTA09	105	Gifts of trading stock to certain charities etc. - no amount is required to be brought into account as a receipt in consequence of the disposal of the article, provided conditions met.		y			y		
CTA09	107	Gifts of medical supplies and equipment - if certain conditions met, no amount is required to be brought into account as a receipt in consequence of the gift.		y			y		
CTA09	108	Applies if relief is given under s107 on certain expenditure and the company, or a person connected with the company, receives a benefit which is in any way attributable to the company's incurring of those costs, then an amount equal to the value of the benefit is brought into account in calculating the profits of the trade.					y		
CTA09	109 - 127	The herd basis rules - deductions available and restrictions apply (e.g. no deduction is allowed for the initial cost of the herd).	y				y		
CTA09	129	Conversion of certain securities in the hands of a financial concern not treated as a disposal.		y					
CTA09	131	Incidental costs of issuing qualifying shares (building societies) - allowable if conditions met.		y					

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CTA09	133A	Banking companies - in calculating the profits of a trade, no deduction is allowed for expenses incurred if the expenses are in respect of amounts of relevant compensation, and the disclosure condition is met in relation to the expenses (see s133C).					y		
CTA09	134	When a dealer in land buys woodlands the cost attributable to the trees is ignored in calculating any profit. Prior to 1988 any profit from felling the trees would have been caught by Schedule B. Since 1988 profits arising from the occupation of commercial woodlands are wholly outside the scope of CT (s980 CTA 2009 and BIM 67701).					y		
CTA09	136	When calculating the profits of a trade of dealing in land - if a receipt of the trade falls within one of the specified categories, the receipt is reduced by the relevant amount.	y						
CTA09	137	Restricts relief for expenditure on searching for and testing mineral deposits of a source or winning access to them. Introduced by FA 1977.					y		
CTA09	139	Applies for the purpose of calculating the profits of a trade carried on by an intermediary which is treated as making a deemed employment payment in connection with the trade; there is no deduction in respect of the deemed employment payment, or any employer's national insurance contributions paid by the intermediary in respect of it, may be made except in accordance with this section. Special rules apply to partnerships.					y		
CTA09	141	This section applies for the purpose of calculating the profits of a trade carried on by a managed service company which is treated as making a deemed employment payment in connection with the trade. No deduction in respect of the deemed employment payment, or any employer's national insurance contributions paid by the MSC in respect of it - may be made except in accordance with this section.					y		
CTA09	142	Deduction for site preparation expenditure where such expenditure is capital and has not been relieved by capital allowances.	y	y	y	y			
CTA09	145	Deduction for site restoration expenditure where such expenditure is capital and has not been relieved by capital allowances.	y	y	y	y			
CTA09	146	Deductions for certain capital expenditure by cemeteries and crematoria. Among other matters the sections reverse <i>Edinburgh Southern Cemetery v Kinmont</i> (1889) 2TC 516.					y		
CTA09	147	Restrictions apply if an interest in land in the cemetery or memorial garden is sold with a view to the land being used for the purpose of interments, or for memorial garden plots.					y		
CTA09	149	Expenditure is excluded for the purposes of section 147 so far as it has been, or is to be, met (directly or indirectly) by the Crown, a government or local or other public authority (whether in the United Kingdom or elsewhere), or any person other than the person incurring the expenditure.		y					
CTA09	149A	Crematoria: niches, memorials and inscriptions - restrictions apply to allowable expenditure.					y		
CTA09	153	Applies to marketing authorities and certain other statutory bodies; any sums which the body is required by or under the scheme to pay into the fund out of the profits of its trade are allowed as deductions in calculating the profits of the trade. Additionally, sums withdrawn by the body from the fund are taken into account as trading receipts, but restrictions apply.					y		
CTA09	157 - 160	Changes in trading stock. Origin s37 and Sch 15 FA 2008. Overrides GAAP where there are changes to trading stock otherwise than by way of trade. Puts on a statutory basis the case-law "market value" rule where there are non-trade appropriations to or from stock in trade. Also makes explicit that where a transaction involving stock in trade is within the transfer-pricing regime that regime takes precedence over the "market value" rule.	y		y				
CTA09	161	Transfer pricing rules to take precedence over s159 - 160.			y		y		
CTA09	162	Rules for valuing stock and wip on discontinuance. Largely anti-avoidance.			y				
CTA09	167	Valuation of stock on cessation of trade. Sale basis of valuation - election by connected persons.			y				
CTA09	173	Restriction on relief for unremittable amounts.			y				

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CTA09	180 - 187	Adjustments on a change in the basis on which the profits of a trade are calculated for CT purposes. Origin s64 and Sch 22 FA 2002. Specifies what adjustments are required for tax purposes when a business either has a change of accounting basis or changes the way in which tax adjustments are made to accounts profits. Provides a comprehensive set of rules for ensuring that in either of these circumstances profits and losses are neither counted more than once nor left out of account to any extent. Replaces the rules in s44 and Sch 6 FA 1998 which dealt only with a change of accounting basis.	y	y	y	y			
CTA09	188 - 189	Impose a charge on post-cessation receipts. Anti- avoidance originally in FA 1960.	y	y	y	y			
CTA09	196	Post-cessation receipts - no deduction is allowed if the loss, expense or debit arises directly or indirectly from the cessation itself, or if the amount has been allowed under any other provision of the Tax Acts.	y			y			
CTA09	Part 4	Property income.	y						
CTA09	213	The following provisions of Part 3 - tied premises, caravan sites, surplus business accommodation and payments for wayleaves - secure that amounts which would otherwise be brought into account in calculating the profits of the business are brought into account instead in calculating the profits of a trade.	y			y			
CTA09	215 - 247	Lease Premiums etc.: Provides for certain amounts (which would otherwise generally be amounts of a capital nature) to be brought into account as receipts in calculating the profits of a property business.	y		y				
CTA09	251	Deduction for expenditure on energy-saving items - allowable if conditions met. Restrictions apply.							
CTA09	254	Deduction for expenditure on sea walls - allowable; apportionment has to be made.					y		
CTA09	261	Adjustment on change of basis; s262 gives effect to positive and negative adjustments.	y	y	y	y			
CTA09	263	No deduction on certain expenditure on an integral feature.	y		y				
CTA09	269	Capital allowances and loss relief UK property business - in certain circumstances, this section requires separate calculations to be made of the profits of the furnished holiday lettings part and the other part. S269A mirrors this provision for overseas property business.	y			y			
CTA09	272	Mineral royalties are usually included in trading profits. Where exceptionally they are treated as property income s272 provides for a management expenses deduction.				y	y		
CTA09	279	Extent of charge to tax on rent receivable for UK electric-line wayleaves - not chargeable to tax if a company carries on a UK property business in relation to some or all of the land to which the wayleave relates, and receipts in respect of some or all of that land are brought into account in calculating the profits of the business.				y	y		
CTA09	280	The charge to corporation tax on income applies to post-cessation receipts arising from a UK property business.	y	y	y	y			
CTA09	Parts 5 and 6	Profits arising from loan relationships.	y	y	y		y		
CTA09	320	States situations when credits and debits treated as relating to capital expenditure.			y				
CTA09	320A	Amounts recognised in other comprehensive income and not transferred to profit or loss - must be brought into account as credits or debits, if certain conditions are met.			y				
CTA09	321A	Restriction on debits resulting from release of loans to participators etc.	y		y				
CTA09	322	Release of debts: cases where credits not required to be brought into account. The company is not required to bring into account a credit in respect of the release if any of conditions met.			y				
CTA09	323A	Substantial modification: cases where credits not required to be brought into account.			y				
CTA09	324	Restriction on debits resulting from revaluation.			y				
CTA09	325	Restriction on credits resulting from reversal of disallowed debits.			y				
CTA09	326	If a government investment in a company is written off by the release of a liability to pay any amount under a debtor relationship of the company, the company is not required to bring into account a credit for the purposes of this Part in respect of the release.					y		
CTA09	327	Disallowance of imported losses etc. if conditions met.					y		
CTA09	328	Restriction on bringing into account exchange gains and losses.			y				

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CTA09	329	If a company may enter into a loan relationship or related transaction but has not yet done so, and it incurs any expenses for purposes connected– with entering into it, or with giving effect to any obligation which might arise under it, and had the company entered into the relationship or transaction, the expenses would be expenses within section 306A(1)(c), then expenses are treated as expenses in relation to which debits may be brought into account in accordance with section 307(2) to the same extent as if the company had entered into the relationship or transaction.				y			
CTA09	330	Debits in respect of pre-trading expenditure - if conditions met in respect of a trade, the debit is treated as if it were a debit for the accounting period in which the company begins to carry on the trade.			y				
CTA09	330A	Company is not, or has ceased to be, party to loan relationship; if conditions met, the company must bring credits and debits into account for the purposes of this Part for the accounting period as if the company were a party to the qualifying relationship for the whole of the accounting period.			y				
CTA09	330B	Exclusion of debit where relief allowed to another.			y				
CTA09	352	Disregard of related transactions.				y			
CTA09	352A	Exclusion of credits on reversal of disregarded loss.				y			
CTA09	354	Exclusion of debits for impaired or released connected companies debts.				y			
CTA09	358 - 360	Exclusion of credits on release of connected companies debts.				y			
CTA09	361	Adjustments required in case of acquisition of creditor rights by connected company at undervalue.				y			
CTA09	365 - 371	Group Relief Claims Involving Impaired or Released Consortium Debts - adjustments apply.				y			
CTA09	372 - 379	Outlines the treatment of the debits to be brought into account in cases where certain conditions relating to interest that is not paid or is paid late are met and there is a connection between the parties to the loan relationship.				y			
CTA09	380	If conditions met, then for corporation tax purposes under section 1259, no credits or debits may be brought into account in relation to the money debt, or in relation to any loan relationship that would fall to be treated for the purposes of the calculation as arising from the money debt.				y			
CTA09	384	A company partner must bring credits and debits into account in respect of exchange gains and losses which are not recognised as prescribed by s328(3) - s328(3) applies only so far as exchange gains and losses are recognised in the firm's statement of total recognised gains and losses, statement of recognised income and expense, statement of changes in equity or statement of income and retained earnings.				y			
CTA09	386 - 393	Contains special rules about the treatment of the loan relationships of insurance companies.				y			
CTA09	395	Profits or losses of a capital nature arising to an investment trust from a creditor relationship may not be brought into account as credits or debits.				y			
CTA09	396	Profits or losses of a capital nature arising to a venture capital trust from a creditor relationship may not be brought into account as credits or debits.				y			
CTA09	397	In calculating the income of a credit union for any accounting period, no credit is to be brought into account for the purposes of this Part in respect of a loan relationship of the union if a member of the union stands in the position of debtor in relation to the debt in question; exceptions apply.				y			
CTA09	400	If an amount to be brought into account in respect of an index-linked gilt-edged security falls to be determined by reference to its value at two different times, and there is a change in the relevant prices index between the earlier and the later time. Then if that change is an increase, the carrying value of the security at the earlier time is increased by the same percentage as the percentage increase in the relevant prices index between those times.				y			
CTA09	400A	Where this section applies, any increase in the carrying value of the security is reduced.				y			
CTA09	400B	In determining for the purposes of section 400A the amount of an economic profit or loss made by a group of companies in any period, the economic profits and losses of each member of the group are to be computed over that period (whether or not that period is an accounting period of the member).				y			

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CTA09	401	If a person exchanges a gilt-edged security for strips of that security: the security is treated as having been redeemed at the time of the exchange by the payment to that person of its market value. Conditions have to be met.					y		
CTA09	404	Restriction on deductions etc. relating to FOTRA securities.					y		
CTA09	405	Certain non-UK residents with interest on 3½% War Loan 1952 or After - interest on money borrowed for the purposes of the business is to be brought into account as a debit for the purposes of this Part for that period only so far as it exceeds the ineligible amount.					y		
CTA09	409	Postponement until redemption of debits for close companies' deeply discounted securities - an adjustment (s410 lists exceptions to this rule).					y		
CTA09	413	This section applies to the issue of funding bonds to a creditor in respect of a liability to pay interest on a debt incurred by a body corporate, a government, a public institution or other public authority - the issue is treated for the purposes of the Corporation Tax Acts as if it were the payment of so much of that interest as equals the market value of the bonds at their issue.					y		
CTA09	414	The redemption of funding bonds is not treated as the payment of interest on a debt if certain conditions met.					y		
CTA09	433	This section applies if in the course of the merger a transferor transfers an asset or liability representing a loan relationship to the transferee - the transferor and the transferee are treated as having entered into the transfer of that asset or liability for consideration of an amount equal to the notional carrying value of the asset or liability.					y		
CTA09	434	This section applies instead of section 433 if, in a case where that section would otherwise apply, the transferor is regarded for the purposes of this section as using fair value accounting in respect of the loan relationship. For any accounting period in which the transferee is a party to the loan relationship - the transferee is treated as if it had acquired the asset or liability representing the relationship for consideration of an amount equal to the transferor's amount.					y		
CTA09	435	Reorganisations involving loan relationships - such debits and credits are to be brought into account as would be brought into account if the reorganisation were a disposal of the asset representing the loan relationship for consideration of an amount equal to its notional carrying value.					y		
CTA09	436	This section applies instead of section 435 if, in a case where that section would otherwise apply, the original holder is regarded for the purposes of this section as using fair value accounting in respect of the loan relationship constituting or included in the original shares. The amount which is to be brought into account by the original holder in respect of the reorganisation ("the disposal amount") is the fair value of the asset representing the loan relationship as at the date when the reorganisation occurred, or of the rights under or interest in that relationship as at that date.					y		
CTA09	441	This section applies if in any accounting period a loan relationship of a company has an unallowable purpose. The company may not bring into account for that period for the purposes of this Part so much of any credit in respect of exchange gains from that relationship as on a just and reasonable apportionment is attributable to the unallowable purpose.					y		
CTA09	444	If credits or debits in respect of a loan relationship are to be brought into account in respect of a related transaction, and that transaction is not a transaction at arm's length, then those credits or debits are to be determined in accordance with the independent terms assumption (subject to s445).					y		
CTA09	446	Lists rules bringing into account adjustments made under Part 4 of TIOPA 2010.					y		
CTA09	447	Exchange gains and losses on debtor relationships: loans disregarded under Part 4 of TIOPA 2010.					y		
CTA09	448	Exchange gains and losses on debtor relationships: equity notes where holder associated with issuer - the exchange gain or loss must be left out of account in determining the credits or debits to be brought into account.					y		

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CTA09	449	Exchange gains and losses on creditor relationships: no corresponding debtor relationship - the exchange gain or loss must be left out of account in determining the credits or debits to be brought into account for the purposes of this Part if conditions met (exceptions apply).					y		
CTA09	452	Restrictions apply to exchange gains and losses where loan not on arm's length terms.					y		
CTA09	455A	Adjustments to debits arising from derecognition of creditor relationships.					y		
CTA09	455B	Any loan-related tax advantages that would (in the absence of this section) arise from relevant avoidance arrangements are to be counteracted by the making of such adjustments as are just and reasonable in relation to credits and debits to be brought into account for the purposes of this Part.					y		
CTA09	456 - 463	Covers rules for setting off non-trading deficits and explains how to make a claim to carry them forward or back.					y		
CTA09	481	Application of Part 5 to relevant non-lending relationships - part 5 applies in relation to the relevant matters as it applies in relation to such matters arising under or in relation to a loan relationship, but the only credits or debits to be brought into account for the purposes of that Part in respect of the relationship are those relating to those matters.					y		
CTA09	486	Where a company is party to an arrangement which produces for the company a return in relation to any amount which is economically equivalent to interest, Part 5 applies as if the return were a profit arising to the company from a loan relationship (subject to exemptions).					y		
CTA09	490	Covers circumstances when holdings in OEICs, unit trusts and offshore funds treated as creditor relationship rights.					y		
CTA09	491	This section applies if a relevant holding is held by a company and s490 applies to the holding for the second period but not the first period; then the opening value of the holding as at the beginning of the second period is taken to be equal to its market value for the purposes of TCGA 1992 immediately before the end of the first period.					y		
CTA09	492	If section 490 applies for an accounting period of a company to a relevant holding held by the company, (b)a relevant fund enters into any arrangements, or arrangements are entered into that in whole or part relate to a relevant fund, and (c)the main purpose or one of the main purposes of the arrangements is to obtain a tax advantage for a person, then the company must make adjustments to counteract any tax advantage connected in any way with the relevant holding that would be obtained by the company, or any other person, directly or indirectly in consequence of the arrangements or their being entered into.					y		
CTA09	508	Provision not at arm's length: exclusion of arrangements, sections 503 to 507.					y		
CTA09	514	Exclusion of alternative finance return from consideration for sale of assets.					y		
CTA09	520	Provision not at arm's length: non-deductibility of relevant return.					y		
CTA09	521B	No debits are to be brought into account by the investing company as respects the share but this does not affect debits to be brought into account in respect of exchange gains or losses, if: the company holds a share in another company, and section 521C applies to the share. Also, part 5 apply as if at those times the share were rights under a creditor relationship of the investing company, and any distribution in respect of the share were not a distribution (and accordingly is within Part 5).					y		
CTA09	540	Manufactured interest to be treated as interest under loan relationship.					y		
CTA09	541	Debits for deemed interest under stock lending arrangements disallowed.					y		
CTA09	545	Ignoring effect on lender etc. of sale of securities.					y		
CTA09	546	Charge on lender for finance return in respect of the advance.					y		
CTA09	550	Ignoring effect on borrower of sale of securities if conditions met.					y		
CTA09	551	Relief for borrower for finance charges in respect of the advance.					y		
CTA09	562	Contract to be loan relationship - If the subsection applies, that excess is not to be brought into account as a credit under Part 5 representing a profit from a related transaction arising as a result of the lump sum becoming payable.					y		

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CTA09	563	Increased non-trading credits for BLAGAB and EEA taxed contracts if conditions met.					y		
CTA09	567	Gains on deemed surrenders to be brought into account on related transactions.					y		
CTA09	568	Restriction on credits on old contracts: fair value accounting cases.					y		
CTA09	569	Restriction on debits on old contracts: non-fair value accounting cases.					y		
CTA09	Part 7	Profits arising from derivative contracts.	y	y	y		y		
CTA09	595	Amounts to be brought into account by a company as credits or debits for any period are those which are recognised in determining the company's profit or loss for the period in accordance with generally accepted accounting practice - but this is subject to subsections (3) and (4) of the section.		y					
CTA09	597	If, in accordance with generally accepted accounting practice, an amount is shown as a prior period adjustment, it must be brought into account in calculating the company's profits and losses for the period to which the statement relates. Exceptions apply.		y					
CTA09	599A	Restrictions apply to amounts not fully recognised for accounting purposes.					y		
CTA09	600	This section applies to a derivative contract which meets the condition in section 579(1)(b) (contract which is or forms part of a financial asset or liability for accounting purposes). The amounts to be brought into account in accordance with this Part in respect of the contract are to be determined on the basis of fair value accounting.					y		
CTA09	604	Applies if generally accepted accounting practice allows a credit or debit in respect of a company's derivative contract to be treated as an amount recognised in determining the value of a fixed capital asset or project - despite that treatment, the credit or debit must be brought into account in the accounting period for which it is given, in the same way as a credit or debit which is recognised in determining the company's profit or loss for that period in accordance with generally accepted accounting practice.					y		
CTA09	605	Applies if in accordance with generally accepted accounting practice a credit or debit for a period in respect of a company's derivative contract is recognised in equity or shareholders' funds, and is not recognised in any of the statements mentioned in section 597(1) (amounts recognised in determining a company's profit or loss) - the credit or debit must be brought into account for the period in the same way as a credit or debit which is recognised in determining the company's profit or loss for the period in accordance with generally accepted accounting practice.					y		
CTA09	606	The profits and losses arising to a company on its derivative contracts include exchange gains and losses but exceptions apply.		y	y		y		
CTA09	613 - 615	Adjustments required in case of change of accounting policy.							
CTA09	616 - 618	Circumstances when fair value accounting is disapplied.			y				
CTA09	633 - 638	Provisions for special kinds of company e.g. mutual trading companies, insurance companies and venture capital trusts.					y		
CTA09	639 - 659	Provisions about cases in which credits and debits are not to be brought into account in accordance with section 574 (non-trading credits and debits to be brought into account under Part 5: loan relationships), but instead profits arising to a company from its derivative contracts are chargeable to corporation tax as chargeable gains. Also makes provisions for cases in which credits and debits are not to be brought into account in accordance with section 573 (trading credits and debits to be brought into account under Part 3: trading income) or section 574 (non-trading credits and debits to be brought into account under Part 5: loan relationships), but instead provisions relating to corporation tax on chargeable gains apply in relation to derivative contracts.					y		
CTA09	660	When company ceases to be party to contract relating to holding in OEIC, unit trust or offshore fund, then (if certain conditions are met) - the company must bring into account for the accounting period in which it ceases to be a party to the contract the amount of any chargeable gain or allowable loss which would have been treated as accruing to it on the assumptions in subsection (3) of this section.					y		



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CTA09	661	When a company is a party to a relevant contract which (not having been a derivative contract) becomes a derivative contract - the company must bring into account for the accounting period in which it ceases to be a party to the relevant contract the amount of any chargeable gain or allowable loss which would have been treated as accruing to it on the assumptions in subsection (3) of this section.					y		
CTA09	662	Contracts ceasing to be derivative contracts - the company is treated for the purposes of corporation tax on chargeable gains as if it had acquired the contract immediately after the relevant time for consideration of an amount equal to the notional carrying value of the contract at that time.					y		
CTA09	666	If conditions met, an allowable loss equal to the amount of the excess is treated as accruing to the company in the accounting period for the purposes of corporation tax on chargeable gains.					y		
CTA09	670	Restrictions on net gains and losses on exercise of option.					y		
CTA09	672	Specifies the sums allowable as a deduction under section 38(1)(a) of TCGA 1992 (acquisition costs) for the purpose of calculating any chargeable gain accruing to the company on the disposal of certain embedded derivatives.					y		
CTA09	674 - 681	Provisions applying to European cross-border transfers of business; broadly, if in the course of the transfer of business the transferor transfers the rights and liabilities under a derivative contract to a transferee, then the transferor and the transferee are treated as having entered into the transfer of those rights and liabilities for consideration of an amount equal to the notional carrying value of the contract, unless the transferor uses fair value accounting as respects the derivative contract. Similar provisions are applied to chapter 10 - European Cross-border mergers.					y		
CTA09	690	The company may not bring into account so much of any exchange credit in respect of that contract as is referable to the unallowable purpose on a just and reasonable apportionment.					y		
CTA09	692	If in any accounting period a derivative contract of a company has an unallowable purpose, and there is a net loss in respect of that contract for that period, then the amount of the excess accumulated net losses in respect of the contract for an accounting period is to be brought into account as a debit for that period.					y		
CTA09	693	This section deals with the credits and debits which are to be brought into account in accordance with this Part as a result of [Part 4 of TIOPA 2010]1 (provision not at arm's length) applying in relation to a company's derivative contracts or related transactions - credits or debits relating to the imputed amount are to be brought into account in accordance with this Part to the same extent as they would be in the case of an actual amount of such profits or losses (or expenses).					y		
CTA09	694	Provisions for bringing into account/restricting exchange gains and losses for a company which is a party to a derivative contract and Part 4 of TIOPA 2010 applies.					y		
CTA09	695	Transfers of value to connected companies - if a company ("A") paid an amount ("amount X") to a company ("B") for the grant of an option and conditions are met, A must bring into account a credit of the appropriate amount in respect of the derivative contract for the accounting period in which the option expired or would have expired if none of the rights under it had been exercised.					y		
CTA09	696	Restrictions on interest payments deductible in the accounts in case of derivative contracts with non-UK residents. Exceptions apply.					y		
CTA09	698	Restrictions in case of disposals for consideration not fully recognised by accounting practice.					y		
CTA09	Part 8	Gains in respect of intangible fixed assets.	y	y	y				
CTA09	721	Receipts recognised as they accrue - the amount of the credit is the same as the amount of the gain recognised by the company for accounting purposes, subject to any adjustments required by this Part or Part 4 of TIOPA 2010.		y			y		
CTA09	723	If in a period of account there is an increase in the accounting value of an intangible fixed asset on a revaluation, a credit must be brought into account for tax purposes.					y		

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CTA09	724	If in a period of account a gain is recognised in determining the company's profit or loss in respect of negative goodwill arising on an acquisition of a business, a corresponding credit must be brought into account for tax purposes - the amount of the credit is so much of the gain recognised for accounting purposes as, on a just and reasonable apportionment, is attributable to intangible fixed assets.					y		
CTA09	725	Reversal of previous accounting loss - restriction on amount of the credit brought into account for tax purposes.					y		
CTA09	728	If in a period of account expenditure on an intangible fixed asset is recognised in determining a company's profit or loss, a corresponding, equivalent debit amount must be brought into account for tax purposes - this is subject to Part 4 of TIOPA 2010).					y		
CTA09	729	If a loss is recognised in determining a company's profit or loss in respect of capitalised expenditure on an intangible fixed asset, a corresponding debit must be brought into account for tax purposes - this is to be calculated using a specified formula.					y		
CTA09	732	Reversal of previous accounting gain - a corresponding debit must be brought into account for tax purposes - amount calculated using specified formula.					y		
CTA09	735	Asset written down for tax purposes - a difference between proceeds on realisation and tax written down value must be brought into account for tax purposes. Similar provisions apply to Asset shown in balance sheet and not written down for tax purposes. Special formula applies to a part realisation.					y		
CTA09	740	Abortive expenditure on realisation - the amount of the debit is the same as the amount of the loss recognised by the company for accounting purposes, subject to Part 4 of TIOPA 2010.					y		
CTA09	758	Roll-over relief - a company is treated as if the proceeds of realisation of the old asset, and the cost recognised for tax purposes of acquiring the other assets, were each reduced by the amount available for relief; these amounts are subject to tax adjustments. Additional rules apply to groups.					y		
CTA09	775	Transfers within a group treated as tax-neutral for groups if conditions met.					y		
CTA09	780 - 791	Company ceases to be a member of group - if a company that is a member of a group transfers an intangible fixed asset to another company, and the transferee ceases to be a member of the group, the transferee treated as if it had realised the relevant asset immediately after its transfer to the transferee for its market value at that time, and had immediately reacquired the asset at that value.					y		
CTA09	792 - 799	Reallocation of degrouping charge within group. Roll over relief may apply.					y		
CTA09	818 - 826	Circumstances when transfers of business or trade is tax neutral for the purposes of Part 8. Conditions/exemptions apply.					y		
CTA09	827 - 830	Transfer of assets to non-UK resident company - the proceeds of realisation adjusted for tax purposes.					y		
CTA09	845 - 849	Transfer between company and related party treated as at market value. Exemptions apply.					y		
CTA09	849B-D	These restrict when and how corporation tax relief is allowed in relation to internally-generated goodwill and certain customer-related intangible assets acquired on incorporation of a business.					y		
CTA09	853	Grants to be left out of account for tax purposes.					y		
CTA09	857	Deemed market value acquisition: adjustment where nil accounting value.					y		
CTA09	859	Asset ceasing to be chargeable intangible asset: deemed realisation at market value.					y		
CTA09	860	If conditions met, Part 8 applies as if the proceeds of the realisation of the asset that is treated as occurring under section 859 were reduced to the original cost of the asset recognised for tax purposes.					y		
CTA09	861	Treatment of postponed gain on subsequent realisation - if a company realises the asset to which section 860 applies before the end of the period of 6 years after the date on which it ceases to be UK resident. UK resident parent must bring into account for tax purposes a credit equal to the postponed gain, or in the case of a part realisation, a credit equal to the appropriate proportion of the postponed gain (formula provided by the section).					y		
CTA09	862	Treatment of postponed gain in other cases - if conditions met, the UK resident parent must bring into account for tax purposes a credit equal to the postponed gain.					y		

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CTA09	866	If a debit in respect of employees' remuneration is recognised by a company for accounting purposes, and apart from this section, a debit in respect of the remuneration could be brought into account for the purposes of this Part for the period of account in which the debit is recognised - no such debit may be so brought into account unless the remuneration is paid before the end of the period of 9 months beginning with the end of the period of account.					y		
CTA09	868	If a debit in respect of pension contributions is recognised by a company for accounting purposes, and the contributions are not paid until after the end of the period of account in which the debit is recognised - the contributions may be brought into account for the purposes of this Part only when they are paid.					y		
CTA09	869	No debit may be brought into account for the purposes of this Part in respect of a debt owed to the company, except by way of impairment loss, or so far as the debt is released as part of a statutory insolvency arrangement.					y		
CTA09	872	If as a result of the change of accounting policy there is a difference between the accounting value of an intangible fixed asset of the company at the end of the earlier period, and the accounting value of that asset at the beginning of the later period, and no election has been made in respect of the asset under section 730 - tax adjustments are made for the difference. Similar provisions apply to change of policy cases involving disaggregation.					y		
CTA09	887 - 889	Expenditure on the acquisition of an asset is treated as incurred when it is recognised for accounting purposes, subject to section 888 (cases where chargeable gains rule applies), and section 889 (cases where capital allowances general rule applies).					y		
CTA09	Part 9	Profits arising from disposals of know-how and sales of patent rights.	y	y					
CTA09	909	Exceptions to charge to tax on profits from disposals of know-how.					y		
CTA09	912 -913	Charge to tax on profits from sales of patent rights - calculation and exceptions.					y		
CTA09	914 - 917	Spreading of charge to tax; if proceeds of sale not received in instalments the appropriate fraction of the amount chargeable is taxed in the accounting period in which the company receives the proceeds of sale and in successive accounting periods, unless the company makes an election to tax the whole amount in the period of receipt.					y		
CTA09	924	Relief may be claimed under this section for patent application and maintenance expenses.					y		
CTA09	Part 9A	Company distributions.	y						
CTA09	931A - 931W	Treatment of company distributions. Origin s34 and Sch 14 FA 2009. These determine the scope of the corporation tax charge on income on both UK and foreign company distributions. The rules for distributions received by small companies are distinct from the rules for medium and large companies but in each case the result is that the great majority of distributions will be exempt from corporation tax. The Schedule contains anti-avoidance rules to prevent abuse of distribution exemption. The changes were part of the package of measures introduced as a result of the Government's review of the taxation of foreign profits.	y		y				
CTA09	Part 10	Miscellaneous income; this Part applies the charge to corporation tax on income to beneficiaries' income from estates in administration, income from the holding of an office, income treated as received from unauthorised unit trusts, income treated as arising from the sale or other realisation of dividend coupons in respect of foreign holdings, annual payments not otherwise charged to corporation tax, other income not otherwise charged to corporation tax.	y			y	y		
CTA09	Part 11	Relief for particular employee share acquisition schemes.	y				y		
CTA09	1000	Deduction for expenses incurred in setting up a QUEST. Provides relief for expenses which would otherwise be capital. Unlikely to be used now, as a QUEST is tax-advantageous only in very limited circumstances.	y	y		y	y		
CTA09	Part 12	Other relief for employee share acquisitions.	y				y		

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CTA09	1013	Deduction when an employee acquires certain shares. Origin Sch 23 FA 2003. An adjustment to accounting profit. Ensures symmetry between the tax charge on the employee and tax relief for the employer.	y				y		
CTA09	Part 13	Additional relief for expenditure on research and development.	y		y				
CTA09	1044	Enhanced deduction for expenditure on R&D incurred by SMEs. Origin Sch 20 para 1 FA 2000. Designed to encourage particular behaviour.	y		y				
CTA09	1085	Enhanced deduction for expenditure on R&D in relation to vaccines or medicine incurred by a large company. Origin s54 and Sch 13 FA 2002. Designed to encourage particular behaviour.					y		
CTA09	Part 14	Remediation of contaminated land.					y		
CTA09	1143	Enhanced deduction for expenditure on remedying contamination or dereliction of land. Origins Sch 22 FA 2001 and s26 and Sch 7 FA 2009. Designed to encourage particular behaviour.					y		
CTA09	Part 15	Film production.					y	y	
CTA09	Part 15A	Television production.					y	y	
CTA09	Part 15B	Video Games Development.					y	y	
CTA09	Part 15C	Theatrical Productions.					y	y	
CTA09	Part 16	Companies with investment business.	y	y		y			
CTA09	1219	In calculating the corporation tax to which a company with investment business is liable for an accounting period, expenses of management of the company's investment business which are referable to that period are allowed as a deduction from the company's total profits. Origin s75 ICTA as amended by s38 FA 2004.	y	y		y			
CTA09	1222	Income from a source not charged to tax - the amount of that income is deducted from the amount that would otherwise be deductible under section 1219 for the accounting period in which the income arises.				y			
CTA09	1229	Clawback of relief for management expenses repaid or never disbursed. Origin s45 FA 2004.				y			
CTA09	Part 17	Partnerships.							
CTA09	Part 18	Unremittable income.	y						
CTA09	1274	This Part applies if a company is liable for corporation tax on income arising in a territory outside the United Kingdom, and the income is unremittable.				y	y		
CTA09	1275	If a company liable for corporation tax on unremittable income makes a claim for relief under this section in respect of that income, it is not taken into account for corporation tax purposes.				y	y		
CTA09	Part 19	General exemptions.	y						
CTA09	1279	No liability to corporation tax arises in respect of profits from a FOTRA security or a loan relationship represented by such a security if conditions A and B are met.					y		
CTA09	1281	No liability to corporation tax arises in respect of income from authorised savings certificates.					y		
CTA09	1282	No liability to corporation tax arises in respect of income from authorised Ulster Savings Certificates if condition A or B is met.					y		
CTA09	1284	No liability to corporation tax arises in respect of a payment if it is made under an enactment relating to the giving of financial assistance for the provision, maintenance or improvement of housing accommodation or other residential accommodation (conditions need to be met).					y		
CTA09	1286	No liability to corporation tax arises in respect of a sum paid by way of supplement under section 79 of VATA 1994 (VAT repayment supplements).	y		y				
CTA09	1287	No liability to corporation tax arises in respect of anything received by way of incentive under any regulations made in accordance with Schedule 38 to FA 2000 (regulations for providing incentives for electronic communications).							
CTA09	Part 20	General calculation rules.	y						

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CTA09	1288	Disallowance of remuneration unpaid 9 months after the end of the period of account. Adjustment to accounting profit. Anti-avoidance as part of the reform of Schedule E from the earnings basis to the receipts basis. Origin s43 FA 1989.	y		y				
CTA09	1290	Restriction of deduction for contributions to an employee benefit scheme mirroring the restriction for unpaid remuneration in s1288. Origin Sch 24 FA 2003. Introduced when Inland Revenue feared they were going to lose <i>Dextra Accessories Ltd v MacDonald</i> [2005] STC 1111.				y			
CTA09	1298	Disallowance of business entertainment and gifts. Adjustment to accounting profit. See separate Papers about the origins of s15 FA 1965.	y		y				
CTA09	1301	In calculating a company's income from any source, no deduction is allowed for an annual payment which meets the conditions of the subsection.	y		y	y			
CTA09	1301A	In calculating a company's income from any source for corporation tax purposes, no deduction is allowed for interest otherwise than under Part 5 (loan relationships).							
CTA09	1301B	Charitable donations may not be deducted in computing income from any source. Charitable donations generally would be disallowed in computing trading or property income by s54(1)(a)- <i>Bourne &amp; Hollingsworth Ltd v Ogden</i> (1929) 14 TC 349. This is the counterpart to s189 CTA 2010.	y		y	y			
CTA09	1302	No deduction for Primary Class 1 NICs. A statutory adjustment to accounting profit. The legislation will need to be reviewed if as part of IT/NICs alignment we go for ACA.			y				
CTA09	1303	Penalties, interest and VAT surcharges are not deductible in calculating profits for any CT purpose. A statutory adjustment to accounting profit introduced as part of the review and reform of penalties generally introduced by FA 2007 and FA 2008. This gives statutory effect across the whole of corporation tax to the decision in <i>CIR v Alexander von Glehn</i> (1920) 12 TC 232.	y		y				
CTA09	1304	Crime related payments are not deductible in computing income from any source for CT purposes, or as an expense of management. A statutory adjustment to accounting profits originally aimed at payments contrary to The Prevention of Terrorism Act.	y		y				
CTA09	1305	No deduction for dividends or other distributions. Presumably GAAP would stop a deduction for dividends, but the prohibition is need in respect of "other distributions". An adjustment to the accounting profit.	y		y				
CTA09	Part 21	Other general provisions, including definitions for the purposes of the Act.							
CTA10	Parts 4 to 7	Lists provisions for the following reliefs.						y	
CTA10	37	Relief for trade losses - trading losses set against current AP and carried back to previous AP (claim must be made and conditions met). There is also a limit on deduction if accounting period falls partly within 12 month period.						y	
CTA10	39	Terminal losses: extension of periods for which relief may be given. Anti-avoidance provisions apply.						y	
CTA10	44	Relief under s37 CTA 2010 not available unless for the loss-making period the trade is carried on a commercial basis, and with a view to the making of a profit.						y	
CTA10	45	Loss relief for trading losses brought forward claimed against profits (must meet conditions).						y	
CTA10	46	Losses brought forward allowed against certain investment income which would otherwise have been treated as trading income.				y		y	
CTA10	56 - 59	Restrictions on the use of loss reliefs by a company which is a limited partner or a member of an LLP. Anti-avoidance. Not an adjustment to trade profits.						y	
CTA10	61	Losses unrelieved as a result of s59 CTA 2010 to be carried forward. Not an adjustment to trade profits. For LLP only.						y	
CTA10	62 - 67	Relief for losses from property businesses.						y	
CTA10	68 - 90	Relief for losses on a disposal of shares.						y	
CTA10	91	Relief for losses from miscellaneous transactions.						y	
CTA10	92 - 96	Write-off of government investment - restricted in some circumstances.					y		

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CTA10	97 - 188	Group relief; provisions e.g. s100 - restrictions for setting off trading losses against group relief, s105 - lists restriction on surrender of losses etc. within section 99(1)(d) to (g), and s137(7) - Corporation tax relief is not to be given more than once for the same amount.						y	
CTA10	189 - 217	Relief for qualifying charitable donations.	y	y	y				
CTA10	218 - 269	Community investment tax relief.						y	
CTA10	269A - 269DO	Provisions for specific types of business and company - banking companies.					y		
CTA10	270 - 356JNB	Provisions for specific types of business and company - oil activities.					y		
CTA10	356K - 356NG	Provisions for specific types of business and company - oil contractor activities.					y		
CTA10	Part 8A	Provisions for specific types of business and company - profits arising from the exploitation of patents etc.					y		
CTA10	357H - 357XI	Provisions for specific types of business and company - Trading Profits Taxable at the Northern Ireland Rate.					y		
CTA10	357YA - 357YW	Provisions for specific types of business and company - restitution interest.					y		
CTA10	358 - 437C	Provisions for specific types of business and company - leasing plant or machinery.					y		
CTA10	438 - 465	Provisions for specific types of business and company - close companies.					y		
CTA10	466 - 517	Provisions for specific types of business and company - charitable companies etc.					y		
CTA10	518 - 609	Provisions for specific types of business and company - Real Estate Investment Trusts.					y		
CTA10	610 - 671	Provisions for specific types of business and company - other special types of company; contains provision about taxation in relation to open-ended investment companies, authorised unit trusts, court investment funds, open-ended investment companies which take the form of umbrella companies, and authorised unit trust schemes which take the form of umbrella schemes.					y		
CTA10	Part 14	Anti-avoidance provision - change in company ownership; losses/reliefs restricted if conditions met.	y				y	y	
CTA10	Part 14A	Anti-avoidance provision - transfer of deductions; restricts the circumstances in which deductible amounts may be brought into account where there has been a qualifying change in relation to a company.	y			y	y		
CTA10	Part 14B	Anti-avoidance provision - carried-forward losses; restriction on a deduction in respect of a relevant carried-forward loss.					y	y	
CTA10	Part 15	Anti-avoidance provision - transactions in securities; makes provision for counteracting corporation tax advantages obtained or obtainable by companies to which section 733 applies in respect of a transaction or transactions in securities.					y		
CTA10	Part 16	Anti-avoidance provision - factoring of income; for transfers of income streams a lump sum received for the sale or transfer is subject to tax in the transferor's hands in the same way that the income itself would have been (so there is no possibility of converting income into capital).					y		
CTA10	Part 17A	Anti-avoidance provision - manufactured dividends; if conditions met, no deduction in calculating income for corporation tax purposes is allowed in respect of the manufactured dividend.					y		
CTA10	Part 18	Anti-avoidance provision - transactions in land; prevents the avoidance of corporation tax by companies concerned with land or the development of land.					y		
CTA10	Part 19	Anti-avoidance provision - the sale and lease-back of assets; in certain circumstances where a transfer is made regarding land, and the transferor or an associate becomes liable to make a payment connected with the land, corporation tax relief for the payment is restricted.					y		
CTA10	Part 20	Anti-avoidance provision - leasing plant or machinery; restrictions on leasing partnership losses apply in certain circumstances.					y		
CTA10	Part 21	Anti-avoidance provision - other arrangements involving asset leasing; makes provision for corporation tax purposes about the taxation of leasing arrangements.					y		
CTA10	Part 21A	Anti-avoidance provision - risk transfer schemes; contains rules about the treatment of certain losses made by companies as a result of risk transfer schemes.					y		
CTA10	Part 21B	Anti-avoidance provision - group mismatch schemes.					y		

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CTA10	Part 21BA	Anti-avoidance provision - tax mismatch schemes.					y		
CTA10	Part 21C	Anti-avoidance provision - removes entitlement to corporation tax reliefs where a person makes a relievable charity donation which is a tainted donation.					y		
CTA10	Part 22	Miscellaneous provisions.							
CTA10	940 - 953	Provision with respect to transfers of trade without a change of ownership.	y			y			
CTA10	954 - 957	Provision with respect to transfers of trade to obtain balancing allowances.	y			y			
CTA10	958 - 962	Provision with respect to transfer of relief within partnerships.					y		
CTA10	963 - 966	Provision with respect to the surrender of tax refunds within groups of companies.			y				
CTA10	967 - 968	Provision with respect to the set off of income tax deductions against corporation tax.			y				
CTA10	969 - 972	Provision with respect to the assessment, collection and recovery of corporation tax from UK representatives of non-UK resident companies.					y		
CTA10	973 - 980	Provision with respect to the recovery of unpaid corporation tax due from non-UK resident companies.					y		
CTA10	981 - 989	Exemptions.			y				
TCGA92	Part 1 - 2	General provisions.			y				
TCGA92	8	Company's total profits to include chargeable gains.	y		y				
TCGA92	16A	Restrictions on allowable losses if accrues to the person directly or indirectly in consequence of, or otherwise in connection with, any arrangements.					y		
TCGA92	17	Disposals and acquisitions treated as made at market value.			y				
TCGA92	18	Transactions between connected persons shall be treated transactions otherwise than by way of a bargain made at arm's length; restrictions apply to losses made.			y				
TCGA92	19	Deemed consideration in certain cases where assets disposed of in a series of transactions.					y		
TCGA92	22	There is a disposal of assets by their owner where any capital sum is derived from assets notwithstanding that no asset is acquired by the person paying the capital sum.					y		
TCGA92	23	Receipt of compensation and insurance money not treated as a disposal.			y				
TCGA92	24	The occasion of the entire loss, destruction, dissipation or extinction of an asset shall constitute a disposal of the asset whether or not any capital sum by way of compensation or otherwise is received in respect of the destruction, dissipation or extinction of the asset.			y				
TCGA92	25	Where an asset ceases by virtue of becoming situated outside the United Kingdom to be a chargeable asset in relation to a person, he is deemed to have disposed of the asset immediately before the time when it became situated outside the United Kingdom, and immediately to have reacquired it at its market value at that time.					y		
TCGA92	25ZA - 27	Other cases of deemed disposals and exceptions that apply.					y		
TCGA92	35	Assets held on 31st March 1982 (including assets held on 6th April 1965) - in computing the gain or loss accruing on the disposal it shall be assumed that the asset was on 31st March 1982 sold by the person making the disposal, and immediately reacquired by at its market value on that date. Exceptions apply.				y			
TCGA92	38	Restrictions on acquisition and disposal costs etc.				y			
TCGA92	39	Exclusion of expenditure by reference to tax on income.				y			
TCGA92	40	Conditions to be met for interest to be charged to capital.				y			
TCGA92	41	Restriction of losses by reference to capital allowances and renewals allowances.				y			
TCGA92	42	Where a person disposes of an interest or right in or over an asset, and generally wherever on the disposal of an asset any description of property derived from that asset remains undisposed of, the sums which under paragraphs (a) and (b) of section 38(1) are attributable to the asset shall, both for the purposes of the computation of the gain accruing on the disposal and for the purpose of applying this Part in relation to the property which remains undisposed of, be apportioned.					y		

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TCGA92	43	If in a case where assets have been merged or divided or have changed their nature or rights or interests in or over assets have been created or extinguished, the value of an asset is derived from any other asset in the same ownership, an appropriate proportion of the sums allowable as a deduction in the computation of a gain in respect of the other asset under paragraphs (a) and (b) of section 38(1) shall, both for the purpose of the computation of a gain accruing on the disposal of the first-mentioned asset and, if the other asset remains in existence, on a disposal of that other asset, be attributed to the first-mentioned asset.				y			
TCGA92	46	Straight-line restriction of allowable expenditure.				y			
TCGA92	48	Consideration due after time of disposal - occasions when brought into account immediately or later.					y		
TCGA92	48A	Adjustments when unascertainable consideration received.					y		
TCGA92	49	Contingent liabilities - situations when no allowance shall be made in the computation of the gain.					y		
TCGA92	50	There shall be excluded from the computation of a gain any expenditure which has been or is to be met directly or indirectly by the Crown or by any Government, public or local authority whether in the United Kingdom or elsewhere.					y		
TCGA92	51	Exemption for winnings and damages, etc. (not chargeable gains).					y		
TCGA92	53	An allowance ("the indexation allowance") shall be allowed against the unindexed gain. Various rules and restrictions apply.				y			
TCGA92	55	For the purpose of computing the indexation allowance on a disposal of an asset where, on 31st March 1982, the asset was held by the person making the disposal, it shall be assumed that on that date the asset was sold by the person making the disposal and immediately reacquired by him at its market value on that date.					y		
TCGA92	57	Receipts etc. which are not treated as disposals but affect relevant allowable expenditure.					y		
TCGA92	Part 4	Shares, securities, options etc.				y			
TCGA92	114	If, in a case where section 110(8)(b) applies, the increase in the qualifying expenditure is, in whole or in part, attributable to the cost of acquiring an option binding the grantor to sell ("the option consideration"), then, in addition to any increase under section 110(8)(a) or (b), the indexed pool of expenditure shall be increased by an amount equal to the indexed rise in the option consideration, as determined under subsection (2).					y		
TCGA92	125	Shares in close company transferring assets at an undervalue - restrictions apply to allowable expenditure.					y		
TCGA92	Part 5	Transfer of business assets.				y			
TCGA92	152	Roll-over relief - if conditions met, disposal treated as if made for an amount as would secure neither a gain nor a loss. Restrictions apply to assets only partially replaced.				y			
TCGA92	154	Held-over gain - if new assets are depreciating assets, held over gain not carried forward but claimant treated as if part of chargeable gain equal to the held-over gain did not accrue until one of specified in the section situation occurs.				y			
TCGA92	156ZA	If a company entitled to roll-over relief in case of realisation and reinvestment - then the company is treated as if consideration for the disposal of the old asset were reduced by the amount available for relief.				y			
TCGA92	161	Where an asset acquired by a person otherwise than as trading stock of a trade carried on by him is appropriated by him for the purposes of the trade as trading stock (whether on the commencement of the trade or otherwise) and, if he had then sold the asset for its market value, a chargeable gain or allowable loss would have accrued to him, he shall be treated as having thereby disposed of the asset by selling it for its then market value.				y			
TCGA92	162B	Disincorporation relief. Separate provision applies to post-FA 2002 goodwill.					y		
TCGA92	165 - 169	Conditions for relief for gifts of business assets. Covers situations such as e.g. gifts to non-residents or to foreign-controlled companies.					y		



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TCGA92	Part 6	Companies, oil, insurance etc.					y		
TCGA92	171	Transfers within a group - if conditions met, as if for a consideration of such amount as would secure that neither a gain nor a loss would accrue to company on the disposal.					y		
TCGA92	173	Transfers within a group: trading stock - adjustments required depending on circumstances.			y				
TCGA92	177A	Restriction on set-off of pre-entry losses; schedule 7A to this Act (which makes provision in relation to losses accruing to a company before the time when it becomes a member of a group of companies ...) shall have effect.					y		
TCGA92	177B	Restrictions on setting losses against pre-entry gains - Schedule 7AA to this Act (which makes provision restricting the losses that may be set against the chargeable gains accruing to a company in the accounting period in which it joins a group of companies) shall have effect.					y		
TCGA92	179ZA	Claim for adjustment of calculations under section 179 (Company ceasing to be member of group: post-appointed day cases); a company which meets conditions may make a claim for the amount of the gain to be treated for the purposes of the subsection in question as reduced by an amount specified in the claim.					y		
TCGA92	184A	Restrictions on buying losses: tax avoidance schemes.					y		
TCGA92	184B	Restrictions on buying gains: tax avoidance schemes.					y		
TCGA92	184G	Avoidance involving losses: schemes converting income to capital.					y		
TCGA92	184H	Avoidance involving losses: schemes securing deductions.					y		
TCGA92	185	Deemed disposal of assets on company ceasing to be resident in UK.					y		
TCGA92	186	Deemed disposal of assets on company ceasing to be liable to UK taxation.					y		
TCGA92	187A	Deemed disposal under section 185: ATED-related gains and losses - states when loss or gain accrues.					y		
TCGA92	187B	Deemed disposal of UK residential property interest under section 185 - states when loss or gain recognised.					y		
TCGA92	188C	This section applies where a company ("company A") makes a non-resident CGT disposal to another company ("company B") at a time when both companies are members of the same NRCGT group, then company A's acquisition of the asset is treated as company B's acquisition of the asset, everything done by company A in relation to the asset in the period of company A's ownership of the asset is accordingly treated as done by company B, and the disposal mentioned in subsection (1) is accordingly disregarded.					y		
TCGA92	188D - 188K	Further provisions for NRCGT purposes.					y		
TCGA92	189 - 191	Recovery of tax provisions.					y		
TCGA92	192	Tax exempt distributions.					y		
TCGA92	192A	Exemptions for gains or losses on disposal of shares etc.			y				
TCGA92	193 - 203	Capital gains provisions for oil and mining industries; includes restriction on roll over relief, replacement of business assets etc.					y		
TCGA92	204 - 214	Capital gains provisions for Insurance companies; includes disallowance of insurance premiums as expenses.					y		
TCGA92	215 - 217	Capital gains provisions for building societies; includes provisions for assets transferred from society to company.					y		
TCGA92	218 - 220	Capital gains provisions for the Housing Corporation, Housing for Wales and housing associations; includes disposals of land between the Housing Corporation, Housing for Wales or Scottish Homes and housing associations (no gain no loss if conditions met).					y		
TCGA92	Part 7A	UK Representatives of Non-UK Residents; provides for a branch or agency to be treated as the UK representative of a non-UK resident in respect of certain amounts chargeable to capital gains tax.					y		
TCGA92	276A	No gain/no loss: foreign permanent establishment exemption.					y		

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TCGA92	279	Foreign assets: delayed remittances; if conditions met, the amount of the qualifying gains shall be deducted from the amounts on which the claimant is assessed to capital gains tax for the year in which the qualifying gains accrued to the claimant, but the amount so deducted shall be assessed to capital gains tax on the claimant (or his personal representatives) as if it were an amount of chargeable gains accruing in the year of assessment in which the conditions set out in subsection (3) below cease to be satisfied.					y		
TCGA92	279A	Deferred unascertainable consideration: election for treatment of loss; the taxpayer may make an election under this section for the relevant loss to be treated as accruing in an earlier year in accordance with section 279C if conditions met.					y		
CAA01	Part 1- 2	Introduction - CA's.			y				
CAA01	7	If an allowance is made under any Part of this Act to a person in respect of capital expenditure, no allowance is to be made to him under any other Part in respect of that expenditure.	y		y				
CAA01	8	No double relief through pooling under Part 2 (plant and machinery allowances).			y				
CAA01	11	Allowances are available under this Part if a person carries on a qualifying activity and incurs qualifying expenditure.			y				
CAA01	12	For the purposes of this Part, expenditure incurred for the purposes of a qualifying activity by a person about to carry on the activity is to be treated as if it had been incurred by him on the first day on which he carries on the activity.			y				
CAA01	13	Use for qualifying activity of plant or machinery provided for other purposes - the amount of the notional expenditure is the market value of the plant or machinery on the date when it is brought into use for the purposes of the qualifying activity, subject to other conditions of the section.			y				
CAA01	15 - 20	Lists qualifying activities for the purposes of this part.					y		
CAA01	21 - 38	Lists qualifying expenditure e.g. structures, assets and works, as well as exclusions e.g. production animals etc.					y		
CAA01	52	The amount of the allowance is a percentage of the first-year qualifying expenditure in respect of which the allowance is made, as shown in the table under this section.			y				
CAA01	55	Whether a person is entitled to a writing-down allowance or a balancing allowance, or liable to a balancing charge, for a chargeable period is determined separately for each pool of qualifying expenditure and depends on the available qualifying expenditure in that pool for that period, and the total of any disposal receipts to be brought into account in that pool for that period.			y				
CAA01	61	A person who has incurred qualifying expenditure is required to bring the disposal value of the plant or machinery into account for the chargeable period, subject to calculation rules specified in this section and general limit on amount of disposal value.			y				
CAA01	68	Hire-purchase etc. and plant or machinery provided by lessee - adjustments needed on disposal value on cessation of notional ownership.			y				
CAA01	72	Computer software - adjustments to disposal values (subject to limit on disposal values).			y				
CAA01	74 - 82	Cars, etc.			y				
CAA01	75	The amount of the writing-down allowance to be made to a person for a chargeable period in respect of qualifying expenditure incurred on the provision of a car to which section 74 applies must not exceed £3,000.			y				
CAA01	76	Limit where part of expenditure met by another person.			y				
CAA01	77	For any chargeable period in which the car is used partly for purposes other than those of the qualifying activity any writing-down allowance or balancing allowance to which the person is entitled, or any balancing charge to which the person is liable, must be reduced to an amount which is just and reasonable having regard to the relevant circumstances.			y				

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CAA01	88	If a short-life asset is disposed of at less than market value, the disposal is not one in respect of which an election is made under section 89(6), and there is no charge to tax under ITEPA 2003, the disposal value to be brought into account for the purposes of Chapter 5 is the market value of the asset.		y					
CAA01	89	If, at any time before the cut-off, a person disposes of a short-life asset to a connected person, the transferor is to be treated as having sold the short-life asset to the connected person for an amount equal to the available qualifying expenditure in the short-life asset pool for the chargeable period in which the disposal occurs.		y					
CAA01	100	Long-life assets; if the monetary limit is exceeded for the period, all of the expenditure falling to be incurred under the contract on the provision of the plant or machinery is to be treated for the purposes of this section as incurred in the first chargeable period in which any of the expenditure is incurred.				y			
CAA01	104	Disposal value of long-life assets - the disposal value that the taxpayer must bring into account is the notional written-down value of the long-life asset, calculated using the formula specified under this section.				y			
CAA01	105 - 126	Overseas leasing; includes provisions for disposals made to connected persons (the disposal value to be brought into account is the market value of the plant or machinery at the time of the disposal, or if less, the qualifying expenditure incurred by the person disposing of the plant or machinery) and states circumstances when allowances are prohibited.				y			
CAA01	127 - 158	Ships; chapter contains provisions for what expenditure is/ or is not to be allocated to a single ship pool, and notice postponing first-year or writing down allowance.				y			
CAA01	159 - 171	Provisions affecting mining and oil industries, e.g. restriction on allowance available when decommissioning service is supplied by connected person.				y			
CAA01	185 - 187	Fixtures; circumstances when restrictions on amount of qualifying expenditure apply.		y					
CAA01	205 - 208	Asset provided or used only partly for qualifying activity - reductions in allowances apply if conditions met.		y					
CAA01	209 - 212	Partial depreciation subsidies - reductions in allowances apply if conditions met.				y			
CAA01	213 - 233	Anti-avoidance - allowances under this part may be restricted if a relevant transaction entered into has a tax avoidance purpose.				y			
CAA01	234 - 246	Additional VAT liabilities and rebates; if conditions met, the additional VAT liability is to be treated as qualifying expenditure/generates first-year allowance (limits on a subsequent disposal value apply).				y			
CAA01	247 - 262	Giving effect to allowances and charges; includes provisions for non-BLAGAB long-term businesses (in certain circumstances any allowance and charges due must be apportioned between the businesses).		y					
CAA01	263 - 270	Supplementary provisions; provide provisions for circumstances when a person succeeds to a qualifying activity which until that time was carried on by a connected person - then they may make a s267 election - relevant plant or machinery is treated as sold at a price which gives rise to neither a balancing allowance nor a balancing charge.		y					
CAA01	Part 3A	Business Premises Renovation Allowances - this part imposes restrictions on an allowance given e.g. expenditure not treated as qualifying expenditure if there was a delay in carrying out works.		y					
CAA01	Part 5	Mineral Extraction Allowances - this part imposes, amongst others, limits on qualifying expenditure on mineral exploitation and access (if the mineral asset is an interest in land, so much of the buyer's expenditure on acquiring the asset as is equal to the undeveloped market value of the interest is not qualifying)				y			
CAA01	Part 6	Research and Development Allowances; allowance given for all expenditure incurred for carrying out research and development, or providing facilities for carrying out research and development, but it does not include expenditure incurred in the acquisition of rights in research and development, or rights arising out of research and development, nor does it include expenditure on the provision of a dwelling (but exceptions		y					

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CAA01	Part 7	Know-how Allowances - allowances are available under this Part if a person incurs qualifying expenditure on the acquisition of know-how; "know-how" means any industrial information or techniques likely to assist in manufacturing or processing goods or materials, working a source of mineral deposits (including searching for, discovering or testing mineral deposits or obtaining access to them), or carrying out any agricultural, forestry or fishing operations. Exclusions apply.					y		
CAA01	Part 8	Patent Allowances, this part restricts e.g. amount of disposal value if conditions met.					y		
CAA01	Part 9	Dredging Allowances.					y		
CAA01	Part 10	Assured Tenancy Allowances - lists, amongst other, limits on allowance available in respect of a dwelling-house, to the residue of qualifying expenditure attributable to it.					y		
CAA01	Part 11	Contributions - defines exclusion of expenditure met by contributions and contribution allowances (conditions have to be met).					y		
CAA01	Schedule A1	First-year Tax Credits; a company may claim a first-year tax credit for a chargeable period in which it has a surrenderable loss, unless it is an excluded company in relation to that chargeable period.						y	
TIOPA10	Part 4	Transfer Pricing.					y		
TIOPA10	147	Tax calculations to be based on arm's length, not actual, provision (conditions and exemptions apply).					y		
TIOPA10	187	Tax treatment if actual interest exceeds arm's length interest.					y		
TIOPA10	187A	Excess interest treated as a qualifying distribution.					y		
TIOPA10	188	Double taxation relief by way of credit for foreign tax.					y		
TIOPA10	189	Double taxation relief by way of deduction for foreign tax.					y		
TIOPA10	192	Attribution to guarantor company of things done by issuing company.					y		
TIOPA10	196	Balancing payments between affected persons: no charge to, or relief from, tax.					y		
TIOPA10	198	Balancing payments by guarantor to issuer: no charge to, or relief from, tax.					y		
TIOPA10	200	Election to pay tax rather than make balancing payments.					y		
TIOPA10	202	Election, in guarantee case, to pay tax rather than make balancing payments.					y		
TIOPA10	206A	Modification of basic rule where allowances restricted for certain expenditure.					y		
TIOPA10	Part 5	Advance Pricing Agreements.					y		
TIOPA10	Part 6	Tax Arbitrage.					y		
TIOPA10	231	This Part provides for the service on companies of two kinds of notice, as a result of which they must calculate or recalculate their income or chargeable gains or liability to corporation tax less advantageously.					y		
TIOPA10	243	Consequences of deduction notices.					y		
TIOPA10	244	The rule against double deduction.					y		
TIOPA10	245	Application of the rule against deduction for untaxable payments.					y		
TIOPA10	248	The rule against deduction for untaxable payments.					y		
TIOPA10	254	Rule for calculation or recalculation of income etc. following receipt notice.					y		
TIOPA10	Part 7	Tax Treatment of Financing Costs and Income.					y		
TIOPA10	274 - 305A	Origin s35 and Sch 15 FA 2009. These provide for the restriction of the tax deduction available for finance expenses of groups of companies. The effect of the measure is to limit the aggregate UK tax deduction for UK members of a group of companies that have net finance expenses to the consolidated gross finance expense of that group. The Schedule applies to a group that has either a UK or a foreign parent. Finance expenses and finance income are payments of interest and interest-like payments. The changes were part of the package of measures introduced as the result of the Government's review of the taxation of foreign					y		
TIOPA10	274 - 285	Disallowance of certain financing expenses of relevant group companies arising in a period of account of the worldwide group to which this Part applies.					y		
TIOPA10	286 - 298	The exemption from the charge to corporation tax of certain financing income of UK group companies where financing expenses of relevant group companies have been disallowed under Chapter 3.					y		

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TIOPA10	299 - 305	The exemption from the charge to corporation tax of certain intra-group financing income of UK group companies where the paying company is denied a deduction for tax purposes otherwise than under this Part.					y		
TIOPA10	Part 8	Offshore Funds.					y		
TIOPA10	Part 9A	Controlled Foreign Companies.					y		
TIOPA10	371AA	A charge ("the CFC charge") is charged under this Part on UK resident companies which have certain interests in CFCs, by reference to the chargeable profits of CFCs (if conditions met). Exceptions apply.					y		
FA12	Part 2	Revised Tax Code for Life Assurance business and other long-term business carried on by insurance companies. Brings the tax rules for such companies more into line with those which apply to companies generally and aligns them more closely with the commercial realities of life insurance business.					y		
FA15	77-116	Diverted Profits Tax.					y		