

## 3. COMPANY INCOMES

#### INTRODUCTORY NOTE Α.

The tables in this section are derived mainly from data, on corporation tax assessments and on returns of qualifying distributions, franked investment income and annual payments. One table (table 3,12) is based on petroleum revenue tax assessments. Further statistics on company incomes appeared in the Green Paper on Corporation Tax (Cmnd, 8456).

#### **CORPORATION TAX** В.

- Corporation tax falls on the income and chargeable gains (collectively the "profits") of companies. A company means any body corporate or unincorporated association (including industrial and provident societies, clubs and trade associations) but not a partnership, a local authority or local authority association. The amount of chargeable gains is reduced by the appropriate fraction—see paragraph 6 of the notes on Section 5 (Capital gains tax), Corporation tax, which was introduced by the Finance Act 1965, is payable 9 months after the end of the company's accounting period or within 1 month of the issue of an assessment, whichever is the later. However, some companies which have been carrying on the same trade since before April 1965 are permitted to keep the due date of 1 January in the year following the financial year in which their accounting period ended, so there is still a large proportion of corporation tax paid on 1 January each year. The various rates of corporation tax and capital gains relief since April 1964 are shown at Appendix A.4.
- The Finance Act 1972 introduced an imputation system of corporation tax with effect from April 1973 (paragraph 4 of the notes on Section 1 decribes the system in operation prior to this). Subject to special arrangements for small companies, insurance companies and building societies, a single rate of corporation tax applies to all company profits, whether retained or distributed. Income tax is not charged on dividends but when any qualifying distribution (normally a dividend) is made, advance corporation tax (ACT) is payable by the company and this serves as a tax credit to the shareholders. The ACT payment may ultimately be set against the corporation tax liability of the company, initially for the accounting period in which the distribution was made or, if that is inadequate, against the liability of another year. The rates of ACT are shown in Appendix A.4.
- Double taxation relief. A company resident in the 4. United Kingdom is entitled to claim credit against the United Kingdom corporation tax payable on income or chargeable gains from any foreign source, for foreign tax paid on the same income or gains. The relief may be due either under a double taxation agreement or under unilateral relief provisions. More details are given in the Board's booklets Corporation Tax (pamphlet IR18) and supplements, and Double Taxation Relief (pamphlet IR6).
- A fuller description of corporation tax as originally enacted appears on pages 85 to 88 of the 112th Report of

the Commissioners of Inland Revenue (Cmnd. 4262) and the change to the "Imputation" system made by Finance Act 1972 is explained on pages 5 and 6 of the 115th Report (Cmnd, 5168). Further details are given in pamphlet IR18. For a description of other taxes on profits, now no longer charged, see Inland Revenue Statistics 1975 paragraphs 30-40.

#### C. PETROLEUM REVENUE TAX

- Petroleum revenue tax (PRT) is charged on the profits of winning oil and gas under licence in the United Kingdom, its territorial waters and designated areas of its continental shelf. The charge is on the landed value of oil and gas less royalties, the expenses incurred in finding, extracting, landing it and putting it into a saleable condition and other reliefs described below. The allowable PRT expenses are operating costs for the field including capital expenditure but not interest. The tax is charged, currently at the rate of 75 per cent, on profits arising in each 6 month chargeable period and advance payments of PRT (see paragraph 9) are creditable in full against PRT, PRT is charged on each field separately and in general a company cannot defer paying tax on the profits of one field by off-setting against those profits the development costs of another field. The one exception to this is that immediate PRT relief is given for all abortive expenditure and for exploration and appraisal expenditure incurred after 15 March 1983.
- Apart from the 100 per cent relief for expenditure and certain loss relief provisions, the following additional reliefs are currently given:
  - Uplift-a supplement of 35 per cent is given on i. (broadly, qualifying expenditure exploration and development expenditures) up to the "pay-back" period for each field: that is the period in which cumulative field income first exceeds cumulative allowable expenditure (including uplift), royalty and advance petroleum revenue tax. The restriction does not apply to any expenditure incurred before 1 January 1981 or which is incurred before 1 January 1983 in pursuance of a contract entered into before 1 January 1981. The uplift is intended to compensate for the fact that interest and other costs of financing are not deductible for PRT purposes.
  - Oil Allowance—an oil allowance currently equal in value to 1/4 million tonnes of oil (or to the PRT profits for the field if less) is given to each field for each 6 month chargeable period, subject to a cumulative limit of 5 million tonnes per field. This allowance has been doubled for offshore fields outside the Southern Basin of the North Sea which were approved on or after 1 April 1982 (ie 1/2 million tonnes per chargeable period up to a cumulative limit of 10 million tonnes per field).

- iii. Safeguard—there is a provision which gives automatic protection for the periods up to "pay-back" and for half as many periods again. In any of these periods, if the PRT charge would otherwise reduce the return on a field before corporation tax to less than 15 per cent of cumulative "upliftable" expenditure measured on the basis of historical cost, the charge is cancelled. A tapering provision ensures that the PRT charge will not be more than 80 per cent of the amount (if any) by which the return exceeds 15 per cent of the capital expenditure to date.
- 8. Supplementary petroleum duty (SPD) was charged from 1 January 1981 until 31 December 1982 at a rate of 20 per cent on gross revenues from oil and gas won under licence in the United Kingdom or on the United Kingdom Continental Shelf, less an allowance equal to the value of the ½ million tonnes of oil per field per 6 month chargeable period. The duty is refundable if the field never reaches profitability.
- 9. The Finance Act 1982 introduced advance petroleum revenue tax (APRT) which is charged for the first chargeable period ending after 31 December 1982 in which a gross profit accrues to a participator, and for every one of the nine succeeding periods in which a gross profit accrues. The APRT charge is calculated in a similar way to SPD but with the following tax rates:

1	January 1983 -	30 June 1983	20 per cent
1	July 1983 -	31 December 1984	15 per cent
1	January 1985 -	31 December 1985	10 per cent
1	January 1986 -	31 December 1986	5 per cent

APRT will be phased out by the end of 1986. Payments of APRT are credited pound for pound against any PRT liability currently due or, if not credited in this way, can be carried forward without limit to be credited against subsequent PRT liabilities. APRT liability ceases for all fields after 5 years from first payment: any payments which have not been credited against PRT by that time are repaid to the licensee.

10. Details of the rates of petroleum revenue tax, rates of uplift and the oil allowance for chargeable periods up to the middle of 1984 are given in Appendix A.7.

# D. NOTES ON THE TABLES

- 11. The tables exclude data relating to public corporations.
- 12. The analyses by industry conform as far as possible with the Standard Industrial Classification (SIC) of 1980. However, it does not follow that the figures for each industry are directly comparable with other statistics produced by other departments (eg production statistics) where the unit of classification may be different (eg the establishment as opposed to the company which may cover more than one establishment). A table showing the definition of the industries used in this publication in terms of the Divisions and Classes of the 1980 SIC is given in Appendix B.

### Tables 3.1 to 3.4

- 13. These tables provide figures for the latest years for which reasonably reliable estimates can be made. They relate to assessments processed by early 1984 including estimated assessments where agreement had not yet been reached. Because of the presence in these tables of those estimated assessments (which are subject to amendment) and the considerable time taken to reach agreement for some large companies, revisions to the figures in later years can sometimes be considerable. The tax figures quoted here are accruals ie tax falling due from income arising in the particular year; the actual payment is made in a later period, as described in paragraph 2 above. They cannot therefore be directly compared with the financial year figures of tax receipts in table 1.1.
- 14. The figures of tax relate to corporation tax assessed, after deducting double taxation relief and income tax borne by deduction at source from income received and after other tax adjustments, but before setting off advance corporation tax.
- 15. Tables 3.1, 3.2 and 3.3 show details of income, capital allowances and stock relief, losses and other charges, and deductions taken into account in arriving at the net amount chargeable to corporation tax in agreed cases, together with the net amount chargeable in estimated cases. The number of assessments, the amounts set off for double taxation relief etc and the amount of corporation tax refer to agreed and estimated cases combined.

# Tables 3.5 to 3.7

- 16. In these tables estimates are given of the statutory capital allowances due for the year. The figures do not include any element of unused allowances brought forward from earlier years nor do they exclude those carried forward to later years. Consequently they do not represent the amounts actually allowed against profits in the assessment. The columns in the tables showing totals are based on comprehensive assessments data: the analyses are based on sample information.
- 17. Capital allowances provide a variety of reliefs from corporation tax in respect of expenditure on certain types of capital asset incurred for the purposes of carrying on a trade. The types of capital asset which qualify for relief and the rates of allowances since 1965 are given in Appendix A.3.
- 18. Although, in general, investment allowances ceased to be available in respect of expenditure incurred on or after 17 January, 1966, they were claimed in some instances on later payments due under a legally binding contract entered into before that date.

### Tables 3.8 to 3.11

19. These tables show franked and annual payments made by companies, franked payments received by them (referred to as franked investment income) and annual payments received, advance corporation tax paid under the imputation system of corporation tax, and income tax deducted from annual payments. Franked payments consist of distributions and the advance corporation tax due on those distributions. The major item classed as a distribution is a company's dividends (including capital dividends). Annual payments from which income tax has to be deducted include yearly interest and patent royalties, annuities, certain rents and easements, and payments under deeds of covenant.

- 20. Distributions are not subject to corporation tax in the hands of a recipient company. Franked investment income may be set off against franked payments by a company so as to reduce the amount of advance corporation tax payable. Similarly where a company receives income under deduction of income tax in any accounting period, it may claim to set off that income tax against its own liability to income tax on payments. Income received under deduction of tax is assessable to corporation tax on the company and any income tax suffered by deduction may be set off against the corporation tax liability on the income, provided it has not already been used to off-set the company's income tax liability.
- 21. Whilst liability to corporation tax is assessed annually and in accordance with a company's own accounting period, notification of distributions and annual payments, as well as accounting for advance corporation tax and income tax, is dealt with quarterly. The return period for notification of these payments is normally a calendar quarter but provision is made for other return periods where the company's accounting period does not commence immediately after or end with a calendar quarter. The figures in these tables relate to payments made (and tax due on those payments) in the twelve months ending on 31 March. There are therefore timing differences between these figures and those provided in tables 3.1 to 3.7.
- 22. Intra Group Dividends (table 3.8): a parent company and its subsidiary (if both are resident in the United Kingdom) may elect jointly that the subsidiary shall pay dividends to the parent or to fellow subsidiaries without accounting for advance corporation tax. A similar but more restricted election is available for members of a consortium. Where dividends are paid in accordance with such an election the amounts are not included in these tables. If a company chooses to account for advance corporation tax despite this election the related franked payments are shown as intra group dividends.

- 23. Tax Credit Paid to Non-residents (table 3.8): dividends may be paid to non-residents who are covered by double taxation agreements by which they are entitled to pay at a lower rate of tax on the complete franked payment than the United Kingdom rate. In these cases the company may be authorised to pay to the non-resident the dividend plus the excess tax credit.
- 24. Repayments (tables 3.8 and 3.9): advance corporation tax and income tax must be accounted for quarterly rather than annually. If in a return period franked payments exceed franked investment income, or income tax on payments made exceeds income tax on payments received, a payment of tax is due to the Inland Revenue in respect of that return period. If the position is reversed in a later return period within the same accounting period of the company, the company is entitled to a repayment of tax.
- 25. Annual Payments to Non-residents (table 3.9): income tax is deducted from annual payments at source and accounted for to the Inland Revenue. Where the annual payment is made to a non-resident the deduction is often at a reduced rate under the terms of a double taxation agreement.

### Table 3.12

- 26. This table relates to petroleum revenue tax assessments made by 31 December 1983 including estimated assessments which may be subsequently revised. The figures do not include those fields in production but not yet assessed to petroleum revenue tax.
- 27. The licence debit is the element in the PRT computation which broadly allows for royalty payments to the Secretary of State for Energy. There is a preliminary deduction for the royalties payable in respect of each chargeable period and this is adjusted in subsequent periods to the amounts actually paid. The deduction only takes into account cash payments; royalty taken in kind is already deducted in the determination of gross profits. For chargeable periods after 31 December 1980 it also includes any licence payments other than royalties covered by section 118 of the Finance Act 1981.
- 28. The figures for expenditure in a particular chargeable period refer to expenditure deducted against profits in an assessment for the period and include, where applicable, uplift on that expenditure.

TABLE 3.1 Company incomes Analysis by industry: assessments for 19791 Number, income, allowances, deductions and tax

See notes on page 22				NI-A	Other	Capital	
ndustry	Number of assessments	Gross trading profits	Capital allowances and stock relief <sup>2</sup>	Net trading profits	income	gains <sup>3</sup>	
	Agreed and estimated	Agreed asse	ssments				
Agriculture, forestry and fishing Energy and water supply	10.6 0.7	223.4 304.4	147.3 116.4	76.1 188.0	19.2 29.4	8.0 8,6	
Manufacturing (Revised definition)							
Extraction, metal	11.8	1,861.8	1,041.3	820,6	308.7	10.3	
manufacture, chemicals	54.4	3,709.4	2,027.3	1,682.1	343.2	18.2	
Metal goods & engineering Other manufacturing	43,1	3,292.7	1,684.3	1,608.5 	408.3 	25.3 	
Total manufacturing (Revised definition)	109.3	8,863.9	4,752.9	4,111.9	1,059.5	53.8	
Construction	56.2	984.4	517.7	466.7	133.0	14.8	
	07.0	3,538.9	1,787.4	1,751.5	386.2	46.2	
Distribution and repairs Hotels and catering	97.9 31.7	252.4	80.1	172.3	48.0	10.2	
Transport & communication	21.5	974.1	425.3	548.8	150.2	47.2	
Banking, finance and insurance	33.1	1,893.6	526.7	1,366.9	1,694.5	211.3	
Business services		4 057 0	622.2	635.1	708.0	73.6	
and leasing	67.1	1,257.3	224.5	269.7	167.6	8.6	
Other services	44.3	494.2	227.J	200.1			
Overseas	1.1	530.5	54.8	<b>475</b> .7	183.8	2.4	
Not classified	0.1	-	· –	-		0.1	
Total all industries	473.6	19,317.1	9,255.3	10,062.7	4,579.3	484.8	

<sup>1</sup>Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year.

2Capital allowances less balancing charges and stock relief less recoveries,

<sup>-</sup>Capital allowances less balancing charges an set off against trading profits. 3As reduced (see paragraph 6 on page 55). 4Set off against profits.

TABLE 3.1 (continued)
Company incomes
Analysis by Industry: assessments for 19791
Number, income, allowances, deductions and tax

See notes on page 22				NC	Imbers: tho	usands; Amou	mes: E munon	
Industry	Losses4	Other charges and deductions	Net amoun corporation	chargeable to tax		Double taxation relief etc.	Corporation tax	
	Agreed assessments			Estimated Total assessments		Agreed and estimated assessments		
Agriculture, forestry and fishing Energy and water supply	39.1 134.1	21.9 39.5	42.2 52.4	10.0 483.5	52.2 535.8	3.1 6.7	23.9 272.1	
Manufacturing (Revised definition) Extraction, metal manufacture, chemicals Metal goods & engineering Other manufacturing	180 . 1 495 . 9 309 . 7	373.4 694.7 704.9	586.1 852.9 1,027.5	274.3 625.4 405.1	860.4 1,478.3 1,432.6	93.6 78.5 94.4	357.0 710.4 677.8	
Total manufacturing (Revised definition)	985.7	1,773.0	2,466.5	1,304.8	3,771.3	266.5	1,745.2	
Construction	230.5	187.8	196.2	97.6	293.8	18.3	135.6	
Distribution and repairs Hotels and catering	597.1 33.6	671.8 73.7	915.0 123.2	924.0 89.2	1,838.9 212.3	93.6 7.8	863.8 100.5	
Transport & communication	179.9	383.0	183.3	70.7	254.0	17.0	116.3	
Banking, finance and insurance Business services	352.2	1,568.0	1,352.5	1,499.2	2,851.7	662.0	805.3	
and leasing	219.3 72.4	721.8 127.7	475.6 245.8	271.1 171.2	746.6 417.0	38.8 51.1	352.7 166.4	
Other services						420.5	240.5	
Overseas	27.5	121.9	512.5	758.0	1,270.5	420.5		
Not classified	-		0.1	0.1	0.2		0.1	
Total all industries	2,871.4	5,690.1	6,565.3	5,679.4	12,244.3	1,585.3	4,822.4	

TABLE 3.2 Company incomes Analysis by industry: assessments for 19801 Number, income, allowances, deductions and tax

See notes on page 22				Numbers: thousands; Amounts: £ million			
Industry	Number of assessments	Gross trading profits	Capital allowances and stock relief <sup>2</sup>	Net trading profits	Other income	Capital gains <sup>3</sup>	
	Agreed and estimated	Agreed ass	essments				
Agriculture, forestry						· <del></del>	
and fishing	11.1	215.3	140,7	74.6	24.2	9.3	
Energy and water supply	0.8	135.0	79,7	55,3	172.2	0.7	
Manufacturing (Revised definition) Extraction, metal							
manufacture, chemicals	11.7	1,313.6	643,8	669,8	263,2	23.7	
Metal goods & engineering	59.4	2,737.7	1,367.2	1,370.6	358.9	22.0	
Other manufacturing	44.5	2,769.4	1,530.2	1,239.2	395,0	31.9	
Total manufacturing (Revised definition)	115.6	6,820.7	3,541.2	3,279.6	1,017.1	77.6	
Construction	58.8	1,021.3	534.2	487.1	162.6	15.8	
Distribution and repairs	104.3	2.934.7	1,325.6	1,609.1	449.9	64.4	
Hotels and catering	33,0	203.7	106.1	97.6	67.0	12.5	
Transport & communication	22.4	897.3	369.9	527.4	201.2	46.7	
Banking, finance							
and insurance	34.9	1,780.3	438.9	1,341.4	1,718.0	100.0	
Business services	70.0	4 400 0	477		***		
and leasing Other services	72.2 48.0	1,100.0 492.3	477.5 231.9	622.5 260.3	772.1	79.0	
	70.0	40E, 3	231.3	200.3	191.6	8.4	
Overseas	1.0	131.7	37.5	94.2	78.0	7.2	
Not classified	0.3	2.4	0.4	1.9	0.4	0.2	
Total all industries	502.4	15,734.7	7,283.6	8,451.0	4,854.3	421.8	

<sup>1</sup>Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year.

2Capital allowances less balancing charges and stock relief less recoveries, set off against trading profits.

3As reduced (see paragraph 6 on page 55).

4Set off against profits.

TABLE 3.2 (continued)
Company incomes
Analysis by industry: assessments for 1980±
Number, income, allowances, deductions and tax

Industry	Losses4	Other charges and deductions	Net amoun corporation	t chargeable to tax		Double taxation relief etc.	Corporatior tax
	Agreed ass	sessments		Estimated assessments	Total	Agreed and assessment	
Agriculture, forestry and fishing Energy and water supply	41.7 18.9	18.5 174.1	47.9 35.2	8.9 872.6	56.8 907.8	3.9 6.7	25.7 465.5
Manufacturing (Revised definition) Extraction, metal							
manufacture, chemicals	176.2 358.0	326.5 577.2	454.0 816.3	409.9 897.0	863.8 1,713.3	76.8 52.0	358.1 842.9
Metal goods & engineering Other manufacturing	302.1	627.9	736.1	659.5	1,395.6	102.6	626.6
Total manufacturing						004 4	4 007 0
(Revised definition)	836.3	1,531.6	2,006.4	1,966.4	3,972.7	231.4	1,827.6
Construction	267.3	181.4	216.8	124.0	340.8	23.1	157.3
Distribution and repairs	606.3	545.5	971.6	920.1	1,891.7	94.3	892.2
lotels and catering	27.2	46.8	103.1	69.4	172.5	9.5	80,9
Fransport & communication	228.4	361.0	185.9	129.4	315.3	14.3	152.2
Banking, finance and insurance Business services	461.6	1,422.1	1,275.7	1,784.6	3,060.3	479.7	1,100.0
and leasing	249.3	722.3	502.0	473.1	975.1	43.3	474.7
Other services	76.9	130,2	253.2	128.9	382,1	57.5	142.2
Overseas	16,1	52.7	110,6	2,039.7	2,150.2	849.0	269.5
Not classified	0.4	1.7	0.4	1.2	1.6	0.1	0,8
Total all industries	2,830.4	5, 187.9	5,708.8	8,518.3	14,226.9	1,812.8	5,588.6

TABLE 3.3 Company incomes

Analysis by industry: assessments for 19811 Number, income, allowances, deductions and tax

See notes on page 22						Canital
ndustry	Number of assessments	Gross trading profits	Capital allowances and stock relief <sup>2</sup>	Net trading profits	Other income	Capital gains <sup>3</sup>
	Agreed and estimated	Agreed asse	ssments			
Agriculture, forestry and fishing Energy and water supply	11,7 0,9	207.5 102.3	136.3 41.4	71.2 60.9	20.1 32.5	5,8 0,5
Manufacturing (Revised definition)						
Extraction, metal	12.2	1,066.5	445.6	620.9	192.6	14.3
manufacture, chemicals	63.9	2,537.1	1,236.8	1,300.3	381.4	22.2
Metal goods & engineering Other manufacturing	47.1	2,082.6	958,7	1, 124.0	350.4 	30.3
Total manufacturing (Revised definition)	123.2	5,686.2	2,641.1	3,045.2	924.4	66.8
Construction	62.9	924.5	450.9	473.6	180.9	11.3
	112.3	2,452.8	1.088.0	1,364.8	435.0	49.2
Distribution and repairs Hotels and catering	34.3	159.1	83.5	75.6	55.8	13.6
Transport & Communication	24.7	808.2	267.3	541.0	161.3	27.1
Banking, finance and insurance	36.8	1,278.0	242.7	1,035.4	1,434.1	66.8
Business services	<b>20.0</b>	1,038.1	433.0	605.1	769.4	82.9
and leasing	80.2	474.6	219.7	254.9	135.0	9.9
Other services	54.1	7/7.0				
Overseas	1.0	147.3	22.0	125.3	73.5	5.5
Not classified	1.7	22.4	8.5	13.8	5.8	1.9
Total all industries	543.8	13,301.0	5.634.4	7,666.8	4,227.7	341.2

<sup>1</sup>Generally the figures relate to the earnings of accounting periods ending in the financial year to the following 31 March; in aggregate they correspond approximately to the earnings of the calendar year.

2Capital allowances less balancing charges and stock relief less recoveries,

set off against trading profits.

3As reduced (see paragraph 6 on page 55).

4Set off against profits.

TABLE 3.3 (continued)
Company incomes

Analysis by industry: assessments for 19811 Number, income, allowances, deductions and tax

188.5

90.8

16.5

4,4

2,450.4

703,5

107.7

60.6

9,7

4,198.2

See notes on page 22

Business services and leasing

Other services

Not classified

Total all industries

Overseas

Double Industry Losses4 Other Net amount chargeable to Corporation charges corporation tax taxation tax and relief etc. deductions Agreed assessments **Estimated** Agreed and estimated Total assessments assessments Agriculture, forestry 36.3 12,8 48.0 32,4 80.5 7.6 34.7 and fishing Energy and water supply 16.3 34.6 42.9 1,048.3 1,091.2 10.0 557.8 Manufacturing (Revised definition) Extraction, metal 252.1 694.9 137.5 438.2 80.2 manufacture, chemicals Metal goods & engineering 1,133.1 509.5 345.8 488.9 869.2 1,099.3 1,968.6 58.3 969.0 Other manufacturing 332.0 510.3 662.4 941.5 1,603.8 116.9 718.8 Total manufacturing (Revised definition) 815,3 1,251.3 1,969.8 2,735.7 4,705.5 255.4 2,197.3 Construction 241.3 142.0 282.5 200.1 482.6 27.1 225.5 2,262.6 Distribution and repairs 477.2 449.5 922,3 1,340.3 141.2 1,041.0 Hotels and catering 33.2 38.0 73.8 152.7 226.5 9.9 108,7 Transport & communication 170.0 374,4 185,0 257.0 442.0 14.7 216.6 Banking, finance and insurance 360,6 1,014,1 1,161.6 2,145.6 3,307.3 643.6 1,049.5

565.4

201.2

127.3

5,587.2

7,4

626,8

254.5

8.5

1,704.7

10,506.6

1,192.2

1,832.0

16,094.1

455.8

15.9

Numbers: thousands; Amounts: £ million

50.3

33.8

599.4

1,793.5

0.5

581.5

205.1

355.0

6,580.6

7.9