

General scheme of corporation tax. CTA76 s6(1) to (3); FA97 s59(2) and Sch6 PtI par1 26.—(1) Subject to any exceptions provided for by the Corporation Tax Acts, a company shall be chargeable to corporation tax on all its profits wherever arising.

(2) A company shall be chargeable to corporation tax on profits accruing for its benefit under any trust, or arising under any partnership, in any case in which it would be so chargeable if the profits accrued to it directly, and a company shall be chargeable to corporation tax on profits arising in the winding up of the company, but shall not otherwise be chargeable to corporation tax on profits accruing to it in a fiduciary or representative capacity except as respects its own beneficial interest (if any) in those profits.

(3) Corporation tax for any financial year shall be charged on profits arising in that year; but assessments to corporation tax shall be made on a company by reference to accounting periods, and the amount chargeable (after making all proper deductions) of the profits arising in an accounting period shall where necessary be apportioned between the financial years in which the accounting period falls.

(4) Subsection (3) shall apply as respects accounting periods ending on or after the 1st day of April, 1997, as if—

(a) the period beginning on the 1st day of January, 1996, and ending on the 31st day of March, 1997, and

(b) the period beginning on the 1st day of April, 1997, and ending on the 31st day of December, 1998,

were each a financial year.