HMRC - CTM21405 - Outline

ICTA88/S246N - R, ICTA88/S246N (1), (2), (3) (4), & (7)

Once a company had matched an FID paid with a distributable foreign profit (CTM21310), the amount of ACT which could be repaid or set off had to be calculated.

The guidance up to [## ICTA88/S246N - R, ICTA88/S246N (1), (2), (3) (4), & (7)

Once a company had matched an FID paid with a distributable foreign profit (CTM21310), the amount of ACT which could be repaid or set off had to be calculated.

The guidance up to](https://www.gov.uk/hmrc-internal-manuals/company-taxation-manual/ctm21460) only applied where a company did not treat itself as an international headquarters company at any time in the accounting period in which the FID was paid (the ‘relevant period’). Where a company did treat itself as an international headquarters company at any time in that accounting period see CTM21505.

Where a company had paid ACT - the ‘relevant ACT’ - in respect of qualifying distributions made by it in the relevant period, see CTM21340, an amount of ACT was repaid or set off. The amount was the smaller of the ACT which:

had not already been dealt with (used in some way, CTM21410),

would be surplus if certain assumptions were made (CTM21420).

No amount was repaid or set off unless the company made a claim. See also CTM21450 regarding claims on returns.

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