HMRC - CTM81595 - Groups: Group Relief: Surrendering Company Not UK Resident: Amount Of The Loss: UK Recomputation: Life Assurance Companies

If certain conditions are met, a UK parent company (or a UK resident subsidiary of the UK parent company) may be able to claim to set an amount representing the foreign tax loss suffered by a subsidiary resident in another European Economic Area (EEA) territory against its profits, (CTM81510).

In order to quantify the loss eligible for relief, the foreign loss is to be recomputed in accordance with UK principles, (CTM81560).

Because the CT provisions applying to UK resident companies carrying on life assurance business and general insurance business refer to other legislation made under the Financial Services and Markets Act 2000 which applies only to UK companies, it is necessary to modify that legislation by regulations so that the recomputation can be made.

For details of the modifications see the LAM and the GIM.

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