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## SCHEDULES

### SCHEDULE 14

#### CORPORATION TAX TREATMENT OF COMPANY DISTRIBUTIONS

#### PART 2

#### OTHER AMENDMENTS

#### ICTA

- 2 ICTA is amended as follows.
- 3 In section 13(7) (small companies' relief), omit “resident in the United Kingdom”.
- 4 (1) Section 505(1)(c) (charitable companies: general) is amended as follows.
- (2) After sub-paragraph (ii) insert—
- “(iizza) from tax under Part 9A of CTA 2009 (company distributions)”.
- (3) Omit sub-paragraph (iib).
- 5 (1) Section 95ZA (taxation of UK distributions received by insurance companies) is amended as follows.
- (2) In subsection (1), for “section 1285” substitute “section 130(2)”.
- (3) In subsection (2)(a), omit “resident in the United Kingdom”.

<sup>F1</sup>6 .....

#### Textual Amendments

- F1** Sch. 14 para. 6 repealed (with effect in accordance with s. 1184(1) of the amending Act) by [Corporation Tax Act 2010 \(c. 4\)](#), s. 1184(1), **Sch. 3 Pt. 1** (with Sch. 2)

- 7 In section 795 (double taxation relief: computation of income subject to foreign tax), omit subsection (3A).

<sup>F2</sup>8 .....

#### Textual Amendments

- F2** Sch. 14 para. 8 repealed (with effect in accordance with s. 381(1) of the amending Act) by [Taxation \(International and Other Provisions\) Act 2010 \(c. 8\)](#), s. 381(1), **Sch. 10 Pt. 1** (with Sch. 9 paras. 1-9, 22)

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9 Omit sections 806A to 806K (double taxation relief in relation to foreign dividends: onshore pooling and utilisation of eligible unrelieved foreign tax).

10 In section 826 (interest on tax overpaid), omit subsection (7BC).

F3 11 .....

**Textual Amendments**  
F3 Sch. 14 para. 11 repealed (with effect in accordance with s. 1184(1) of the amending Act) by [Corporation Tax Act 2010 \(c. 4\)](#), s. 1184(1), **Sch. 3 Pt. 1** (with [Sch. 2](#))

F4 12 .....

**Textual Amendments**  
F4 Sch. 14 para. 12 repealed (with effect in accordance with s. 1184(1) of the amending Act) by [Corporation Tax Act 2010 \(c. 4\)](#), s. 1184(1), **Sch. 3 Pt. 1** (with [Sch. 2](#))

13 In paragraph 5(3)(c) of Schedule 27 (distributing funds: United Kingdom equivalent profits)—

- (a) for “section 1285” substitute “ Chapter 2 or 3 of Part 9A ”, and
- (b) omit “in like manner as if they were dividends or distributions of a company resident outside the United Kingdom”.

F5 14 .....

**Textual Amendments**  
F5 Sch. 14 para. 14 repealed (with effect in accordance with s. 381(1) of the amending Act) by [Taxation \(International and Other Provisions\) Act 2010 \(c. 8\)](#), s. 381(1), **Sch. 10 Pt. 2** (with [Sch. 9 paras. 1-9, 22](#))

*FA 1989*

15 FA 1989 is amended as follows.

16 (1) Section 85A (life assurance: excess adjusted Case I profits) is amended as follows.

(2) In paragraph (a) of subsection (6), for “distributions received by the company in the accounting period from companies resident in the United Kingdom” substitute “ non-taxable distributions received by the company in the accounting period ”.

(3) After that subsection insert—

“(6A) In this section “non-taxable distribution” means—

- (a) a distribution that is exempt for the purposes of Part 9A of the Corporation Tax Act 2009 (company distributions), and
- (b) does not include any amount withheld from the distribution on account of tax payable under the laws of a territory outside the United Kingdom.”

17 (1) Section 89 (life assurance: policy holders' share of profits) is amended as follows.

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(2) In subsection (2)(b), for “distributions received from companies resident in the United Kingdom” substitute “ non-taxable distributions received ”.

(3) In subsection (7), after the definition of “Case I profits” insert—

““non-taxable distribution” has the same meaning as in section 85A.”

*FA 1994*

18 In section 219 of FA 1994 (taxation of profits of Lloyd's underwriters etc)—

- (a) in subsection (3), omit “Subject to subsection (4A) below,”, and
- (b) omit subsections (4), (4A) and (4C).

*FA 2006*

F<sup>6</sup>19 .....

**Textual Amendments**

**F6** Sch. 14 para. 19 repealed (with effect in accordance with s. 1184(1) of the amending Act) by [Corporation Tax Act 2010 \(c. 4\)](#), s. 1184(1), [Sch. 3 Pt. 1](#) (with [Sch. 2](#))

*CTA 2009*

20 CTA 2009 is amended as follows.

21 In section 1(2) (overview of Act), before the “and” at the end of paragraph (f) insert—

“(fa) Part 9A (company distributions),”.

22 For section 130 (traders receiving distributions etc) substitute—

*“Insurers*

**130 Insurers receiving distributions etc**

(1) This section applies for the purpose of calculating the trading profits of—

- (a) insurance business other than life assurance business, or
- (b) any category of such business.

(2) A receipt that is exempt for the purposes of Part 9A (company distributions) is not brought into account in calculating the profits of the trade.”

23 In section 932(1) (overview of Part 10), omit paragraph (a).

24 Omit Chapter 2 of Part 10 (taxation of dividends from non-UK resident companies).

25 (1) Section 974 (charge to tax in relation to sale of foreign dividend coupons) is amended as follows.

(2) In subsection (3)(a), after “realisation of” insert “ taxable ”.

(3) In subsection (4), after “sale of” insert “ taxable ”.

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- (4) After subsection (4) insert—
- “(4A) For the purposes of subsections (3) and (4) a dividend coupon is “taxable” if the associated dividend would not have been exempt for the purposes of Part 9A (company distributions) had it been paid to the holder of the shares.”
- 26 In section 982(1)(a) and (2)(a) (boundary provisions for Part 10), omit “2.”
- 27 Omit section 1285 (exemption for distributions of UK resident companies).
- 28 In section 1310(4) (orders and regulations subject to affirmative resolution procedure in House of Commons), before paragraph (a) insert—
- “(za) section 931C (meaning of “qualifying territory”),”.
- 29 In Schedule 4 (index of defined expressions), insert at the appropriate places—
- |                                    |                |
|------------------------------------|----------------|
| “ordinary share (in Part 9A)       | section 931U”; |
| “the payer (in Part 9A)            | section 931T”; |
| “the recipient (in Part 9A)        | section 931T”; |
| “redeemable (in Part 9A)           | section 931U”; |
| “a relevant person (in Part 9A)    | section 931T”; |
| “scheme (in Part 9A)               | section 931V”; |
| “small company (in Part 9A)        | section 931S”; |
| “tax advantage scheme (in Part 9A) | section 931V”. |

*Consequential repeals*

- 30 In consequence of the amendments made by this Schedule, omit—
- (a) in F(No.2)A 1997, section 22(2) and (3)(a),
  - (b) in FA 2000, in Schedule 30, paragraphs 8(4)(c), 21 and 22,
  - (c) in FA 2001, in Schedule 27, paragraphs 1(3), 4 and 5,
  - (d) in FA 2008, in Schedule 39, paragraph 25, and
  - (e) in CTA 2009, in Schedule 1, paragraphs 174(4)(c), 252 to 254 and 392(4) and (5).

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**Changes and effects yet to be applied to the whole Act associated Parts and Chapters:**

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- s. 102(4)(za) inserted by [2010 c. 33 Sch. 9 para. 3\(3\)](#)
- Sch. 53 para. 2A-2D and cross-heading inserted by [2010 c. 33 Sch. 9 para. 7](#)
- Sch. 53 para. 6A and cross-heading inserted by [2010 c. 33 Sch. 9 para. 8](#)
- Sch. 53 para. 11A11B and cross-heading inserted by [2010 c. 33 Sch. 9 para. 17](#)
- Sch. 53 para. 14A and cross-heading inserted by [2010 c. 33 Sch. 9 para. 18](#)
- Sch. 54 para. 9B9C and cross-heading inserted by [2010 c. 33 Sch. 9 para. 11](#) (Sch. 54 para. 9B is amended before it comes into force by [2016 c. 24, Sch. 1 para. 66\(5\)](#))
- Sch. 54 para. 12A12B and cross-heading inserted by [2010 c. 33 Sch. 9 para. 19](#)
- Sch. 54 Pt. A1 inserted by [2010 c. 33 Sch. 9 para. 10](#) (Sch. 9 para. 10 is amended before it comes into force by [2017 c. 32, Sch. 4 para. 182](#))
- Sch. 55 para. 6(3A)(za) inserted by [2015 c. 11 Sch. 20 para. 15\(2\)\(a\)](#)
- Sch. 55 para. 6(4A)(za) inserted by [2015 c. 11 Sch. 20 para. 15\(3\)\(a\)](#)
- Sch. 55 para. 17(4)(ba) inserted by [2015 c. 11 Sch. 20 para. 19](#)
- Sch. 56 para. 3(1)(d) omitted by [2021 c. 26 Sch. 27 para. 40\(4\)\(c\)](#)