CORPORATION TAX ACT 2010

EXPLANATORY NOTES

INTRODUCTION

Part 8: Oil activities

Chapter 5: Ring fence expenditure supplement

Section 323: Ring fence losses

1064. This section sets out how much of a trading loss from the ring fence trade is eligible for inclusion in the calculation of post-commencement supplement. It is based on paragraph 17 of Schedule 19C to ICTA.

1065. Subsection (3) provides that losses are not eligible for supplement if they could have been claimed against profits from an earlier accounting period.