

*These notes refer to the Corporation Tax Act 2010  
(c.4) which received Royal Assent on 3 March 2010*

# **CORPORATION TAX ACT 2010**

---

## **EXPLANATORY NOTES**

### **INTRODUCTION**

#### **Part 22: Miscellaneous provisions**

##### ***Chapter 5: Set off of income tax deductions against corporation tax***

##### ***Section 967: Deductions from payments received by UK resident companies***

2883. This section explains how income tax deducted from payments received by UK resident companies is set off against corporation tax. It is based on section 7(2) and (4) of ICTA.
2884. The exception for relevant loan interest in section 7(3) is rewritten by consequential amendment to section 369(6) of ICTA. Section 369 has not been repealed because the relief for certain life annuity payments continues to be in force.

##### ***Section 968: Deductions from payments received by non-UK resident companies***

2885. This section explains how income tax deducted from payments received by non-UK resident companies is set off against corporation tax. It is based on section 11(3) of ICTA.
2886. As is the case for section 7(3) of ICTA, the exception for relevant loan interest in section 11(4) is rewritten by consequential amendment to section 369(6) of ICTA.