



# Corporation Tax Act 2010

## 2010 CHAPTER 4

### PART 14

#### CHANGE IN COMPANY OWNERSHIP

#### [<sup>F1</sup>CHAPTER 2A

##### POST-1 APRIL 2017 LOSSES: FURTHER CASES INVOLVING A CHANGE IN THE COMPANY'S ACTIVITIES

#### [<sup>F1</sup>676A] **Restriction on relief for post-1 April 2017 non-trading loss on intangible fixed assets**

- (1) This section has effect for the purpose of restricting relief under section 753 of CTA 2009 (treatment of non-trading losses) in respect of a relevant non-trading loss on intangible fixed assets.
- (2) An amount is a “relevant non-trading loss on intangible fixed assets” if and so far as—
  - (a) it is by virtue of section 751 of CTA 2009 a non-trading loss on intangible fixed assets for a relevant pre-acquisition accounting period, or
  - (b) it is made up of an amount falling within paragraph (a) which has been carried forward under section 753(3) of CTA 2009.
- (3) “Relevant pre-acquisition accounting period” means an accounting period beginning—
  - (a) before the change in ownership, and
  - (b) on or after 1 April 2017.
- (4) In the case of a relevant non-trading loss on intangible fixed assets, relief under section 753 of CTA 2009 against the total profits of the actual accounting period is available only in relation to each of the notional accounting periods considered separately.

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**Changes to legislation:** There are currently no known outstanding effects for the Corporation Tax Act 2010, Section 676A1. (See end of Document for details)

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- (5) A relevant non-trading loss on intangible fixed assets may not be deducted as a result of section 753(3) of CTA 2009 (losses carried forward) from affected profits of an accounting period ending after the change in ownership.]

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**Textual Amendments**

- F1** Pt. 14 Ch. 2A inserted (with effect in accordance with Sch. 4 para. 190 of the amending Act) by [Finance \(No. 2\) Act 2017 \(c. 32\)](#), **Sch. 4 para. 75**

**Changes to legislation:**

There are currently no known outstanding effects for the Corporation Tax Act 2010, Section 676AI.