



Corporation Tax Act 2009

2009 CHAPTER 4

PART 9 **U.K.**

INTELLECTUAL PROPERTY: KNOW-HOW AND PATENTS

CHAPTER 3 **U.K.**

SALES OF PATENT RIGHTS

Spreading of charge to tax

914 UK resident companies: proceeds of sale not received in instalments **U.K.**

- (1) This section applies if a company liable for tax under section 912—
 - (a) is UK resident, and
 - (b) does not receive the proceeds of sale in instalments.
- (2) The appropriate fraction of the amount chargeable is taxed—
 - (a) in the accounting period in which the company receives the proceeds of sale (“the period of receipt”), and
 - (b) in successive accounting periods, until the expiry of the 6-year period beginning at the start of the period of receipt.
- (3) The appropriate fraction is the same fraction of the amount chargeable as the accounting period in question is of 6 years (or, in the last period, such smaller fraction of that amount as has not already been taxed).
- (4) The company may elect that the whole of the amount chargeable is to be taxed instead in the period of receipt.
- (5) An election under subsection (4) must be made within the two-year period beginning at the end of the period of receipt.

Changes to legislation:

Corporation Tax Act 2009, Section 914 is up to date with all changes known to be in force on or before 06 July 2024. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations.

[View outstanding changes](#)

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

- Blanket amendment words substituted by [S.I. 2011/1043 art. 34](#)

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

- s. 322(2A)(zb) inserted by [2016 c. 24 s. 73\(5\)](#)
- s. 1058B(5)(ea) inserted by [2023 c. 20 Sch. para. 57](#)
- s. 1094(2A)-(2C) inserted by [2012 c. 14 Sch. 3 para. 13\(3\)](#)
- s. 1106(4A)-(4C) inserted by [2012 c. 14 Sch. 3 para. 14\(3\)](#)