

SCHEDULES

SCHEDULE 20

CONTROLLED FOREIGN COMPANIES AND FOREIGN PERMANENT ESTABLISHMENTS

PART 2

FOREIGN PERMANENT ESTABLISHMENTS

Main provision

- 5 (1) Section 18F is amended as follows.
- (2) In subsection (1)(a) for “subsection (6)” substitute “subsections (6) to (8)”.
- (3) For subsection (2) substitute—
- “ (2) The relevant day”, in relation to an election made by a UK resident company, means—
- (a) the day on which, at the time of the election, the company’s accounting period following that in which the election is made is expected to begin, or
- (b) if the election is made before the company’s first accounting period, the day on which that accounting period begins.
- (2A) “The relevant day”, in relation to an election made by a non-UK resident company, means the day on which the company becomes UK resident.”
- (4) In subsection (6) for “The election can be revoked” substitute “An election can be revoked by the company which made it”.
- (5) After subsection (6) insert—
- “ (7) An election made by a UK resident company is revoked if the company ceases to be UK resident.
- (8) An election made by a non-UK resident company is revoked if, having become UK resident, the company ceases to be UK resident.”