

SCHEDULES

SCHEDULE 6

DIVERTED PROFITS TAX

Extension of period for amendment of company tax return

12 After section 101 insert—

“101A Amendment of CT return during review period: section 80 or 81 case

- (1) This section applies where a charging notice is issued to a company by reason of section 80 or 81 applying in relation to it for an accounting period.
- (2) At any time during the first 12 months of the review period, the company may amend its company tax return for the accounting period so as to reduce the taxable diverted profits arising to it in the accounting period.

101B Amendment of CT return during review period: section 86 case

- (1) This section applies where a charging notice is issued to a company (“the foreign company”) by reason of section 86 applying in relation to it for an accounting period.
- (2) At any time during the first 12 months of the review period, the avoided PE may amend a company tax return made by it so as to reduce the taxable diverted profits arising to the foreign company in the accounting period.”