



Finance Act 2022

2022 CHAPTER 3

PART 1

INCOME TAX, CORPORATION TAX AND CAPITAL GAINS TAX

International matters

24 Cross-border group relief

- (1) CTA 2010 is amended as follows.
- (2) In section 107 (restriction on losses etc surrenderable by non-UK resident)—
 - (a) omit subsections (1A), (6A), (6B), (10) and (11);
 - (b) in subsection (2) omit “In any other case,”;
 - (c) in subsection (7) omit “or (6B)”.
- (3) In Part 5 (group relief), omit Chapter 3 (surrenders made by non-UK resident company resident or trading in the EEA).
- (4) In section 188BI (restriction on surrender of losses made when non-UK resident)—
 - (a) omit subsections (2), (8), (9), (13) and (14);
 - (b) in subsection (3) omit “In any other case,”;
 - (c) in subsection (10) omit “or (9)”.
- (5) In Schedule 4—
 - (a) Part 1 makes amendments consequential on this section, and
 - (b) Part 2 makes provision as to commencement.

Changes to legislation:

There are currently no known outstanding effects for the Finance Act 2022, Section 24.