



# Finance (No. 2) Act 2023

## 2023 CHAPTER 30

### PART 3

#### MULTINATIONAL TOP-UP TAX

### CHAPTER 4

#### CALCULATION OF ADJUSTED PROFITS OF MEMBERS OF A MULTINATIONAL GROUP

##### *Adjustments of underlying profits*

#### **[<sup>F1</sup>147 Accrued pension expense**

- (1) This section applies in an accounting period where a member of a multinational group—
  - (a) has made contributions to a pension fund in the period,
  - (b) has received amounts from the pension fund in the period, or
  - (c) otherwise has amounts of income or expense relating to the pension fund reflected in its underlying profits.
- (2) Take the amount of income or expense (expressed as a negative number where expense) that has arisen directly in respect of the fund as reflected in the member's underlying profits and—
  - (a) add the sum of contributions made to the fund by the member in the period, and
  - (b) subtract any amount received by the member from the fund in the period.
- (3) If the result of subsection (2)—
  - (a) is more than nil, reduce the underlying profits by that result, or
  - (b) is less than nil, increase the underlying profits by that result (as expressed a positive number).]

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**Changes to legislation:** There are currently no known outstanding effects for the Finance (No. 2) Act 2023, Section 147. (See end of Document for details)

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#### Textual Amendments

- F1** [S. 147](#) substituted (22.2.2024 with effect for accounting periods beginning on or after 31.12.2023 in accordance with Sch. 12 para. 1(2) of the amending Act) by [Finance Act 2024 \(c. 3\)](#), [Sch. 12 para. 7](#)

**Changes to legislation:**

There are currently no known outstanding effects for the Finance (No. 2) Act 2023, Section 147.