



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

152 Adjustments where life assurance business carried on

- (1) This section applies to a member of a multinational group that carries on a life assurance business.
 - (2) Where amounts charged to the member's policyholders for taxes payable by the member are reflected in its underlying profits, those profits are to be adjusted to exclude such of those amounts as would (had they not been charged to the policyholders) have [^{F1}been included in the member's covered tax balance].
 - (3) Where returns to the member's policyholders are not reflected in the member's underlying profits but corresponding increases or decreases in the liability of the member to the policyholders are so reflected, those profits are to be adjusted so as to reflect those returns to the extent they correspond with those increases or decreases in liability.
- [^{F2}(4) In this section "life assurance business" means—
- (a) a life assurance business within the meaning of section 56 of FA 2012, or
 - (b) a business regulated as a life assurance business under the law of a territory outside the United Kingdom.]

Changes to legislation: There are currently no known outstanding effects for the Finance (No. 2) Act 2023, Section 152. (See end of Document for details)

Textual Amendments

- F1** Words in s. 152(2) 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. 10\(2\)](#)
- F2** S. 152(4) 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. 10\(3\)](#)

Changes to legislation:

There are currently no known outstanding effects for the Finance (No. 2) Act 2023, Section 152.