



Taxation (International and Other Provisions) Act 2010

2010 CHAPTER 8

[^{F1}PART 9A

CONTROLLED FOREIGN COMPANIES

CHAPTER 4

THE CFC CHARGE GATEWAY: PROFITS ATTRIBUTABLE TO UK ACTIVITIES

[^{F1}371DE] **Exclusion: trading profits (the basic rule)**

- (1) All trading profits are to be excluded from the provisional Chapter 4 profits if the following conditions are met—
 - (a) the business premises condition (see section 371DG),
 - (b) the income condition (see section 371DH),
 - (c) the management expenditure condition (see section 371DI),
 - (d) the IP condition (see section 371DJ), and
 - (e) the export of goods condition (see section 371DK).
- (2) Trading profits are also to be excluded from the provisional Chapter 4 profits in accordance with section 371DI(7) and (8) (so far as applicable).
- (3) This section is subject to section 371DL (anti-avoidance).]

Textual Amendments

F1 Pt. 9A inserted (17.7.2012) by [Finance Act 2012 \(c. 14\)](#), [Sch. 20 para. 1](#) (with [ss. 56-58](#))

Changes to legislation:

There are currently no known outstanding effects for the Taxation (International and Other Provisions) Act 2010, Section 371DF.