

SCHEDULES

SCHEDULE 15

OIL ACTIVITIES: TRANSFERABLE TAX HISTORY

PART 3

EFFECT OF A TTH ELECTION ON THE SELLER

Effect of a TTH election: corporation tax

- 16 (1) Sub-paragraphs (2) and (3) apply if the seller makes a loss in a trade in an accounting period.
- (2) For the purposes of section 37(3)(b) of CTA 2010 (including for the purposes of that provision as it has effect under the other trade loss relief provisions), the seller's total profits of a pre-transfer accounting period are treated as being—
- (a) the seller's total profits for that period, less
 - (b) the transferred profits amount for that period.
- (3) For the purposes of section 42 of CTA 2010, the seller's profits of a ring fence trade of a pre-transfer accounting period are treated as being—
- (a) the seller's ring fence profits for that period, less
 - (b) the transferred profits amount for that period.