

*These notes refer to the Corporation Tax Act 2009
(c.4) which received Royal Assent on 26 March 2009*

CORPORATION TAX ACT 2009

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Part 5: Loan Relationships

Overview

Chapter 6: Connected companies relationships: impairment losses and releases of debts

Overview

Section 358: Exclusion of credits on release of connected companies debts: general

1146. This section precludes a debtor company from bringing a credit into account under this Part on the release of a debt where the debtor and creditor companies are connected. It is based on paragraph 5(3) and (5) of Schedule 9 to FA 1996. This section excludes the credits on the release since the debits have been disallowed (see section 354).
1147. *Subsection (1)(b)* brings out the fact that the section applies in respect of the accounting period in which the release occurs.