



Corporation Tax Act 2009

2009 CHAPTER 4

PART 18

UNREMITTABLE INCOME

1275 Claim for relief for unremittable income

- (1) If a company liable for corporation tax on unremittable income makes a claim for relief under this section in respect of that income, it is not taken into account for corporation tax purposes.
- (2) Subsection (1) is subject to section 1276.
- (3) No claim under this section may be made in respect of any income so far as an ECGD payment has been made in relation to it.
- (4) In subsection (3) “ECGD payment” means a payment made by the Export Credits Guarantee Department under an agreement entered into as a result of arrangements made under—
 - (a) section 2 of the Export and Investment Guarantees Act 1991 (c. 67) (insurance in connection with overseas investment), or
 - (b) section 11 of the Export Guarantees and Overseas Investment Act 1978 (c. 18).
- (5) A claim under this section must be made before the expiry of 2 years after the end of the accounting period in which the income arises.

Changes to legislation:

There are outstanding changes not yet made by the legislation.gov.uk editorial team to Corporation Tax Act 2009. Any changes that have already been made by the team appear in the content and are referenced with annotations.

[View outstanding changes](#)

Changes and effects yet to be applied to the whole Act associated Parts and Chapters:

- Blanket amendment words substituted by [S.I. 2011/1043 art. 34](#)

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- Pt. 13 Ch. 1A inserted by [2024 c. 3 Sch. 1 para. 5](#)
- Pt. 14A inserted by [2024 c. 3 Sch. 2 para. 1](#)
- s. 1218ZCLA and cross-heading inserted by [2024 c. 3 Sch. 5 para. 9\(1\)](#)
- s. 142(5)(6) inserted by [2024 c. 3 Sch. 1 para. 9\(14\)\(c\)](#)
- s. 322(2A)(zb) inserted by [2016 c. 24 s. 73\(5\)](#)
- s. 807A substituted for s. 808-808E by [2024 c. 3 Sch. 2 para. 5\(2\)](#)
- s. 934(1A)(1B) inserted by [2023 c. 30 Sch. 2 para. 12\(2\)](#)
- s. 962(3A) inserted by [2023 c. 30 Sch. 2 para. 12\(5\)\(b\)](#)
- s. 962A(3A) inserted by [2023 c. 30 Sch. 2 para. 12\(6\)\(b\)](#)
- s. 963(1A) inserted by [2023 c. 30 Sch. 2 para. 12\(7\)\(a\)](#)
- s. 1040ZA(A1) inserted by [2024 c. 3 Sch. 2 para. 5\(3\)](#)
- s. 1044(2A) inserted by [2024 c. 3 Sch. 1 para. 6\(4\)\(b\)](#)
- s. 1044(5A)(5B) inserted by [2024 c. 3 Sch. 1 para. 6\(4\)\(c\)](#)
- s. 1045(2A) inserted by [2024 c. 3 Sch. 1 para. 6\(5\)\(b\)](#)
- s. 1045(4A) inserted by [2024 c. 3 Sch. 1 para. 6\(5\)\(c\)](#)
- s. 1045ZA inserted by [2024 c. 3 Sch. 1 para. 6\(6\)](#)
- s. 1045ZA(2)(3) modified by [2024 c. 3 Sch. 1 para. 21\(3\)\(4\)](#)
- s. 1052-1053A substituted for ss. 1052, 1053 by [2024 c. 3 Sch. 1 para. 6\(9\)](#)
- s. 1058B(5)(ea) inserted by [2023 c. 20 Sch. para. 57](#)
- s. 1062A inserted by [2024 c. 3 Sch. 1 para. 6\(15\)](#)
- s. 1094(2A)-(2C) inserted by [2012 c. 14 Sch. 3 para. 13\(3\)](#)
- s. 1106(4A)-(4C) inserted by [2012 c. 14 Sch. 3 para. 14\(3\)](#)
- s. 1129(3)(d) and word inserted by [2024 c. 3 Sch. 1 para. 9\(4\)\(b\)](#)
- s. 1131(4) inserted by [2024 c. 3 Sch. 1 para. 9\(5\)\(b\)](#)
- s. 1132A inserted by [2024 c. 3 Sch. 1 para. 9\(6\)](#)
- s. 1134(3)(e) substituted for s. 1134(3)(d) by [2024 c. 3 Sch. 1 para. 9\(8\)\(e\)\(iv\)](#)
- s. 1138A applied by [S.I. 2024/348 reg. 3](#)
- s. 1138A1138B inserted by [2024 c. 3 Sch. 1 para. 9\(12\)](#)
- s. 1140A inserted by [2024 c. 3 Sch. 1 para. 9\(13\)](#)
- s. 1142C inserted by [2024 c. 3 Sch. 1 para. 9\(16\)](#)
- s. 1142D inserted by [2024 c. 3 Sch. 1 para. 9\(17\)](#)
- s. 1142E inserted by [2024 c. 3 Sch. 1 para. 9\(18\)](#)
- s. 1179DT(a) omitted by [2024 c. 3 Sch. 1 para. 12\(2\)\(a\)](#)
- s. 1179FL(a) omitted by [2024 c. 3 Sch. 1 para. 12\(2\)\(b\)](#)
- s. 1217FA(2)(bb) inserted by [2024 c. 3 Sch. 3 para. 2\(2\)\(c\)](#)
- s. 1217JA(3)-(10) inserted by [2024 c. 3 Sch. 3 para. 7\(3\)](#)
- s. 1217KB(4A) inserted by [2024 c. 3 Sch. 3 para. 9](#)
- s. 1217KD and cross-heading inserted by [2024 c. 3 Sch. 3 para. 10\(1\)](#)
- s. 1217QA(1)(a)(b) inserted by [2024 c. 3 Sch. 4 para. 2\(1\)](#)
- s. 1217RF(1)(c) and word inserted by [2024 c. 3 Sch. 4 para. 7\(2\)\(b\)](#)
- s. 1217RF(2)(za)(zb) inserted by [2024 c. 3 Sch. 4 para. 8\(1\)\(b\)](#)
- s. 1217RF(2)(za) omitted by [2024 c. 3 Sch. 1 para. 12\(7\)](#)
- s. 1217RF(3)-(10) inserted by [2024 c. 3 Sch. 4 para. 7\(3\)](#)
- s. 1217RI(4A) inserted by [2024 c. 3 Sch. 4 para. 9](#)
- s. 1217RKA and cross-heading inserted by [2024 c. 3 Sch. 4 para. 10\(1\)](#)
- s. 1218ZAA(4A) inserted by [2024 c. 3 Sch. 5 para. 2\(1\)](#)

- s. 1218ZCG(1)(ba) inserted by 2024 c. 3 Sch. 5 para. 6(2)
- s. 1218ZCG(2A)-(2H) inserted by 2024 c. 3 Sch. 5 para. 6(3)
- s. 1218ZCJ(4A) inserted by 2024 c. 3 Sch. 5 para. 8
- s. 1310(4)(zc) inserted by 2024 c. 3 Sch. 1 para. 12(9)(b)