



Corporation Tax Act 2009

2009 CHAPTER 4

PART 3

TRADING INCOME

CHAPTER 12

DEDUCTIONS FROM PROFITS: UNREMITTABLE AMOUNTS

175 Withdrawal of relief

- (1) This section applies if—
 - (a) some or all of an unremittable amount has been deducted from profits under section 173, and
 - (b) any of the following events occurs.
- (2) The events are that—
 - (a) the amount or part of it ceases to be unremittable,
 - (b) an allowable provision for impairment loss is made in respect of the amount or part of it,
 - (c) the amount or part of it is used to finance expenditure or investment outside the United Kingdom,
 - (d) the amount or part of it is applied outside the United Kingdom in another way,
 - (e) the amount or part of it is exchanged for, or discharged by, an amount that is not unremittable, and
 - (f) if the amount is an amount owed, a payment under a contract of insurance is received in relation to the amount or part of it.
- (3) The amount or the part of it in question is brought into account as a receipt in calculating the profits of the trade of the period of account in which the event occurs, but only so far as—
 - (a) it has been deducted from profits under section 173, and

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- (b) it has not already been brought into account as a receipt in calculating the profits of the trade as a result of this section.
- (4) If the event is the receipt of a payment under a contract of insurance, the amount brought into account as a receipt must not exceed the amount of the payment.
- (5) In subsection (2)(b) “allowable provision for impairment loss” means either—
- (a) a debit in respect of the impairment of a financial asset (see section 476(1)) which is brought into account under Part 5 (loan relationships), or
 - (b) a provision in respect of which a deduction is allowable under section 55 (bad debts).

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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):

- s. 322(2A)(zb) inserted by [2016 c. 24 s. 73\(5\)](#)
- 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. 1058B(5)(ea) inserted by [2023 c. 20 Sch. para. 57](#)
- 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. 1138A applied by [S.I. 2024/348 reg. 3](#)