
Changes to legislation: There are currently no known outstanding effects for the Finance Act 2019, Cross Heading:
Interest allowance (alternative calculation) election: unpaid employees' remuneration. (See end of Document for details)

SCHEDULES

SCHEDULE 11

CORPORATE INTEREST RESTRICTION

Interest allowance (alternative calculation) election: unpaid employees' remuneration

9 After section 424 insert—

“424A Unpaid employees' remuneration

- (1) Where an interest allowance (alternative calculation) election has effect in relation to a period of account of a worldwide group, this Chapter applies in relation to the period subject to this section.
- (2) The definition of “the group's profit before tax” in section 416(2) has effect as if references to amounts that are recognised in the financial statements of the group for the period, as items of profit or loss, excluded amounts so recognised in respect of employees' remuneration that are not paid before the end of the period of 9 months immediately following the end of the period of account.
- (3) If—
 - (a) an amount is, as a result of subsection (2), excluded from the financial statements of the group for the period of account, and
 - (b) the amount is paid in a later period of account of the group in relation to which an interest allowance (alternative calculation) election has effect,the definition of “the group's profit before tax” in section 416(2) has effect as if references to amounts that are recognised in the financial statements of the group for the later period of account, as items of profit or loss, included the amount that is paid in that later period.
- (4) Section 1289 of CTA 2009 (unpaid remuneration: supplementary) applies for the purposes of this section as it applies for the purposes of section 1288 of that Act.”

Changes to legislation:

There are currently no known outstanding effects for the Finance Act 2019, Cross Heading:
Interest allowance (alternative calculation) election: unpaid employees' remuneration.