

UK Corporation Tax and Groups - The Basics

This course will explain what Groups are for UK tax purposes and what the reliefs and implications for companies are of being part of a group, including impact of overseas activity and ownership

It will include :-

Definitions

- Loss Relief Group
- Capital Gains Group
- Impact of non UK entities
- Impact of non-UK ownership

Relief for losses

- Losses qualifying for Group Relief
- Branch losses
- Direction of relief
- Interaction with other loss reliefs
- Payment for relief
- Compliance obligations
- Changes of ownership
- Anti-avoidance

Capital Gains

- Impact of being in a CG Group
- No Gain/No loss transfers
- Limitations of benefit
- Substantial Shareholding Exemption
- Changes of ownership
- Anti Avoidance

Commonly encountered issues and planning