

## SCHEDULES

### SCHEDULE 10

#### CORPORATION TAX RELIEF FOR CARRIED-FORWARD LOSSES

##### *Commencement*

- 32 (1) The amendments made by this Schedule have effect in relation to accounting periods beginning on or after the relevant date (see subparagraph (3)).
- (2) For the purposes of the amendments made by this Schedule, where a company has an accounting period beginning before the relevant date and ending on or after that date (“the straddling period”)—
- (a) so much of the straddling period as falls before the relevant date, and so much of that period as falls on or after that date, are to be treated as separate accounting periods, and
  - (b) where it is necessary to apportion an amount for the straddling period to the two separate accounting period, it is to be apportioned—
    - (i) in accordance with section 1172 of CTA 2010 (time basis), or
    - (ii) if that method would produce a result that is unjust or unreasonable, on a just and reasonable basis.
- (3) The “relevant date” is—
- (a) 1 April 2017, in relation to the amendments made by paragraphs 24 and 25 of this Schedule,
  - (b) 6 July 2018, in relation to the amendments made by paragraphs 1 to 11, 13 and 14 and 16 to 20 of this Schedule, and
  - (c) 1 April 2019, in relation to the other amendments made by this Schedule.