

CORPORATION TAX – FA25 CHANGES GUIDE

Note that all chapters have been updated for FY 2025 rates.

FA25 Ch	FA24 Ch	Topic	Major changes	Minor changes	No changes	Notes
1	1	Introduction to corporation tax			✓	
2	2	Computation of corporation tax		✓		Material on FY2022 and APs straddling 1.4.23 simplified as rate to be provided in exam questions
3	3	Associated companies			✓	
4	4	Long periods of account			✓	
5	5	Corporation tax self-assessment (CTSA)			✓	
6	6	Payment of corporation tax			✓	
7	7	Interest on late paid corporation tax and repayments		✓		Updated for interest rate changes

8	8	CTSA Penalty regime			✓	
9	9	Property income		✓		Abolition of capital allowances for FHL.
10	10	Loan relationships			✓	
11	11	Loan relationships – Connected companies			✓	
12	12	Corporate capital gains			✓	
13	13	Corporate capital gains – Shares			✓	
14	14	Substantial shareholding exemption			✓	
15	15	Intangible fixed assets			✓	
16	16	Intangible fixed assets – related parties			✓	
17	17	Research and development expenditure			✓	

18	18	Companies with investment business		✓		Explanation about the identification of management expenses reordered for clarity.
19	19	Relief for trading losses			✓	
20	20	Relief for other losses		✓		Short explanation of FHL losses following the abolition of FHL regime given.
21	21	The principles of group relief			✓	
22	22	Group relief – Effective use of losses			✓	
23	23	Group relief – Further aspects			✓	
24	24	Consortium relief			✓	
25	25	Group administration			✓	
26	26	Group capital gains			✓	
27	27	Group gains – Further aspects			✓	

28	28	Change in ownership of a company		✓		Examples on interaction of MCINOCOT and MCINOCOB added.
29	29	Transfers of trade			✓	
30	30	Sale of shares			✓	
31	31	Close company definition		✓		Treatment of associates clarified where their shareholdings are attributed to another participator.
32	32	Close company implications		✓		Statement of entities within the charge to s.455 tax clarified and statutory references to bed and breakfasting rules updated for FA 2025.
33	33	Close company implications – Further aspects			✓	
34	34	Accounting for income tax			✓	
35	35	Overseas matters for companies			✓	
36	36	Transfer pricing			✓	
37	37	Purchase of own shares		✓		Change in CGT rate.

OTHER TAXES – FA25 CHANGES GUIDE

Note that all chapters have been updated for 2025/26 thresholds, rates and allowances.

FA25 Ch	FA24 Ch	Topic	Major changes	Minor changes	No changes	Notes
1	1	Incorporation – Income tax aspects			✓	
2	2	Incorporation – Capital gains aspects			✓	
3	3	Incorporation – Other aspects			✓	
4	4	Limited liability partnerships		✓		Update re <i>HMRC v Bluecrest Capital Management (UK) LLP</i>
5	5	Mixed partnerships			✓	
6	6	Termination payments			✓	
7	7	Employed or self-employed?			✓	

8	8	Off-Payroll working			✓	
9	9	Connected persons			✓	
11	11	Takeovers			✓	
12	12	Gifts and QCBs			✓	
12	12	EIS and SEIS reinvestment relief			✓	
13	13	Bad Debt Relief			✓	
14	14	Accounting for VAT			✓	
15	15	The Flat-Rate Scheme			✓	
16	16	Place of Supply	✓			There are no technical changes but the chapter has been reordered and some points have been added for clarity

REQUIRED KNOWLEDGE FROM ATT PAPER 2 – FA25 CHANGES GUIDE

Note that all chapters have been updated for 2025/26 thresholds, rates and allowances.

FA25 Ch	FA24 Ch	Topic	Major changes	Minor changes	No changes	Notes
1	1	Introduction to business entities			✓	
2	2	Basics of accounting			✓	
3	3	Adjustment of profit – general principles			✓	
4	4	Common adjustments			✓	
5	5	Capital allowances – Definitions			✓	
6	6	Capital allowances – Basic computations for companies		✓		FYA on zero-emission cars and electric vehicle charging points extended to apply to expenditure incurred before 1 April 2026

7	7	Capital allowances – First year allowances for companies			✓	
8	8	Capital allowances – More computations for companies			✓	
9	9	Capital allowances – Further computations for companies			✓	
10	10	Capital allowances – Cars and other points for companies			✓	
11	11	Structures and buildings allowances			✓	
12	12	Cash basis			✓	

13	13	Cash basis – Further expenses			✓	
14	14	Tax year basis			✓	
15	15	Sole traders and self-assessment			✓	
16	16	Sole traders – Payment dates and penalties			✓	
17	17	Trading losses for sole traders			✓	
18	18	Introduction to partnerships			✓	
19	19	Partnership changes			✓	
20	20	Partnership losses			✓	
21	21	Class 4 National insurance contributions			✓	
22	22	Introduction to the UK tax system			✓	

23	23	Calculating the income tax liability			✓	
24	24	The taxation of interest			✓	
25	25	The taxation of dividend income			✓	
26	26	Class 1 and Class 1A National Insurance Contributions			✓	
27	27	Introduction to capital gains tax		✓		From 30 October 2024, both residential and non-residential assets are taxed at 18% and 24%
28	28	Calculation of capital gains			✓	
29	29	Relief for capital losses		✓		Since the rate for residential property assets has been abolished, the allocation of losses is now simpler
30	30	Chattels			✓	

31	31	Business Asset Disposal Relief and Investors' relief		✓		Change in rate of BADR from 10% to 14%. Rates and lifetime allowance for Investors' relief changed.
32	32	Rollover relief			✓	
33	33	Rollover relief and depreciating assets			✓	
34	34	Rollover relief – further aspects			✓	
35	35	Gift relief			✓	
36	36	Gift relief – restrictions			✓	
37	37	VAT General Principles			✓	
38	38	Registration			✓	
39	39	Definition of Supplies			✓	

40	40	Schedule 8 VATA 1994 – Zero-Rating			✓	
41	41	Schedule 9 VATA 1994 – Exemptions		✓		Private schools charge VAT on supplies of education fees and board and lodging from 1.1.25 (subject to special pre-payment rules)
42	42	Value of the Supply			✓	
43	43	Time of Supply			✓	
44	44	Input Tax – When to Recover			✓	
45	45	VAT Records & Returns			✓	