

## CORPORATION TAX – FA25 CHANGES GUIDE

This guide refers to changes from the Finance Act 2025.

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 deleted as no longer in the syllabus.
3	3	Associated companies	✓			Material on APs straddling 1.4.23 deleted as no longer in the syllabus.
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			✓	

8	8	CTSA Penalty regime			✓	
9	9	Property income		✓		Abolition of capital allowances for FHL.
10	10	Loan relationships			✓	
11	11	Corporate capital gains			✓	
12	12	Intangible fixed assets			✓	
13	13	Research and development expenditure		✓		New R&D disclosure facility explained.
14	14	Companies with investment business		✓		Explanation about the identification of management expenses reordered for clarity.
15	15	Relief for trading losses			✓	
16	16	Relief for other losses		✓		Short explanation of FHL losses following the abolition of FHL regime given.
17	17	The principles of group relief			✓	
18	18	Group relief – Effective use of losses			✓	
19	19	Group relief – Further aspects			✓	

20	20	Group capital gains			✓	
21	21	Group gains – Further aspects			✓	
22	22	Change in ownership of a company			✓	
23	23	Close company definition		✓		Treatment of associates clarified where their shareholdings are attributed to another participator.
24	24	Close company implications		✓		Statutory references to bed and breakfasting rules updated for FA 2025.
25	25	Accounting for income tax			✓	
26	26	Residence and Double Tax Relief			✓	
27	27	Non-resident companies			✓	
28	28	Transfer pricing			✓	
29	29	Controlled foreign companies			✓	
30	30	Off-Payroll working			✓	

31	31	Adjustment of profit – general principles			✓	
32	32	Common adjustments			✓	
33	33	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
34	34	Capital allowances – First year allowances for companies			✓	
35	35	Capital allowances – More computations for companies			✓	
36	36	Capital allowances – Further computations for companies			✓	
37	37	Capital allowances – Cars and other points for companies			✓	
38	38	Structures and buildings allowances			✓	