

# Completion of Corporation Tax Returns Form CT1 2024

## Part 38-02-01I

This document was created August 2025

Guidance about how to access help in completing the ROS Form CT1 is available in Tax and Duty Manual (TDM) [38-02-01](#) including links to the TDMs for the various years' CT1s.

Guidance on the operational elements of the Research and Development Corporation Tax Credit is in TDM [Part 29-02-03A](#).

Guidance on Payment of Preliminary Corporation Tax is in TDM [Part 41A-07-02](#).

Guidance for 3<sup>rd</sup> party software providers developing Forms CT1 is on the Revenue [Github](#) site.

A video on Corporation Tax and Changing Accounting Periods is available on the [tax and duty professionals](#) page on the website, under the link 'Instructional Videos for Agents'

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]



## Table of Contents

|   |    |
|---|----|
| Introduction .....  | 3  |
| 1 Company Details Panel .....   | 5  |
| 1.1 De Minimis Aid .....  | 5  |
| 1.2 Outbound payments defensive measures .....                              | 6  |
| 1.3 Interest Limitation.....  | 6  |
| 1.4 Group Relief surrender of losses.....                                   | 8  |
| 1.5 Group Relief Claim to losses .....                                      | 10 |
| 1.6 S299 Leases agreed with Corporate Lessees .....                         | 12 |
| 1.7 S299 Leases agreed with Corporate Lessors .....                         | 13 |
| 1.8 S299 Leases agreed with Individual Lessees .....                        | 14 |
| 2 Trading Results.....  | 16 |
| 2.1 Trade Profits at 12.5%.....   | 16 |
| 2.2 Profits from Qualifying Assets under Chapter 5 of Part 29 TCA 1997..... | 16 |
| 2.3 Trade Losses.....   | 16 |
| 3 Extracts from accounts .....  | 17 |
| 3.1 iXBRL text changes .....  | 17 |
| 4 Irish Rental Income .....   | 18 |
| 4.1 Non-Resident Landlord Withholding Tax .....                             | 18 |
| 5 Irish Investment and Other Income .....                                   | 19 |
| 5.1 Leasing Profits .....   | 19 |
| 5.2 Qualifying Financing Companies .....                                    | 20 |
| 5.3 Digital Games Tax changes.....  | 21 |
| 5.6 Updates to Acknowledgement/Assessment .....                             | 22 |
| 6 Capital Gains .....   | 22 |
| 6.1 Gains relating to the disposal of lease machinery or plant.....         | 22 |
| 7 Deductions, Reliefs and Credits .....                                     | 23 |
| 7.1 Relief on Value Basis .....   | 23 |
| 8 Research and Development Credit .....                                     | 23 |
| 8.1 Section 766 .....   | 23 |
| 8.2 Section 766A .....  | 25 |
| 8.3 Section 766C .....  | 26 |
| 8.4 Section 766D .....  | 30 |

|      |   |    |
|------|---|----|
| 9    | Close Company Surcharge .....   | 33 |
| 9.1  | Surcharges (Section 440 and Section 441 TCA 1997) .....   | 33 |
| 10   | Recovery of Income Tax.....   | 34 |
| 10.1 | Interest paid to partnerships and tax transparent entities without the deduction of Income Tax .. | 34 |
|      | Appendix 1: Extract from Accounts.....  | 35 |

Introduction

This manual contains information about how to access help in completing the ROS Form CT1, and it contains updates about the 2024 Form CT1.

The Corporation Tax Return for accounting periods ending in 2024 is available since April 2024: for filing through ROS online and the ROS Return Preparation Facility (RPF). Further updates to the Form CT1 2024 were released on June 2024 and January 2025 .

The updates to the 2024 return are summarised for the highlighted panels. The most significant changes were those to implement the updated R&D corporation tax credit claim provisions and new Digital Games Tax provisions.

|  |           |                |
|--|-----------|----------------|
| <b>Company Details</b>                     | <b>1</b>  | <b>Updated</b> |
| <b>Trading Results</b>                     | <b>2</b>  | <b>Updated</b> |
| <b>Extract from Accounts</b>               | <b>3</b>  | <b>Updated</b> |
| <b>Irish Rental Income</b>                 | <b>4</b>  | <b>Updated</b> |
| <b>Irish Investment &amp; Other Income</b> | <b>5</b>  | <b>Updated</b> |
| <b>Foreign Income</b>                      | <b>6</b>  |                |
| <b>Exempt Profits</b>                      | <b>7</b>  |                |
| <b>Capital Gains</b>                       | <b>8</b>  | <b>Updated</b> |
| <b>Chargeable Assets</b>                   | <b>9</b>  |                |
| <b>Deductions, Reliefs &amp; Credits</b>   | <b>10</b> | <b>Updated</b> |
| <b>Research &amp; Development Credit</b>   | <b>11</b> | <b>Updated</b> |
| <b>Film Corporation Tax Credit</b>         | <b>12</b> |                |
| <b>Capital Gains (Development Land)</b>    | <b>13</b> |                |
| <b>Close Company Surcharge</b>             | <b>14</b> | <b>Updated</b> |
| <b>Recovery of Income Tax</b>              | <b>15</b> | <b>Updated</b> |
| <b>Dividend Withholding Tax</b>            | <b>16</b> |                |
| <b>Calculate</b>                           | <b>17</b> |                |
| <b>Property Based Incentives</b>           | <b>18</b> |                |
| <b>CT Self Assessment</b>                  | <b>19</b> |                |
| <b>CGT Self Assessment</b>                 | <b>20</b> |                |
| <b>Print View</b>                          | <b>21</b> |                |

Figure 1: Summary of ROS CT1 'panels' showing updates in the 2024 CT1

# 1 Company Details Panel

## 1.1 De Minimis Aid

A new section has been added to capture details of state aid received under the De Minimis regulations. This section captures both the state aid received in the current accounting period and over the previous three years. This section is a declaration and does not interact with the CT1 calculations.

**De Minimis Aid**

To comply with EU State aid rules, the total amount of de minimis aid granted per Member State to a single undertaking shall not exceed €300,000 over any period of 3 years. Member States must ensure that the combined amount of de minimis aid granted from all sources to a single undertaking in any three-year period does not exceed the €300,000 ceiling. You are required to provide details of all other de minimis aid which has been granted to you or your company within the past three years. It should be noted that a false declaration by you or your company resulting in the threshold of €300,000 being exceeded could later give rise to the aid being recovered with interest.

Where a claim is made under the following provisions, a declaration in respect of Commission Regulation (EU) 2023/2831 of 13 December 2023 ("the General De Minimis Regulation") is required—

1. Sec. 486C (Start-up company relief) in this accounting period
2. Sec. 372AAC Living City Initiative
3. Sec. 372AAD Living City Initiative
4. Sec. 268(1)(n) and Sec. 272(3)(k)(i) IBA Aviation Services Facilities

If you are applying for aid under the General De Minimis Regulation please tick the box ☐

I confirm that: the company has been granted only the following de minimis aid within the past three years (details to be supplied). Include aid granted under the General De Minimis Regulation and Commission Regulations (EU) 2023/2832, No 717/2014, and No 1408/2013, but exclude the aid in this return.

The gross grant equivalent of the aid in this return is:

Figure 2: New section for state aid under De Minimis regulations

## 1.2 Outbound payments defensive measures

A new section of further details under the Transactions with non-co-operative jurisdictions. This contains an additional section on reporting of outbound payments defensive measures. Up to 50 payments can be entered in this section

**Reporting requirements Chapter 5 Part 33 'Outbound payments defensive measures'**

Date of Payment

Payment Type

Select a type ▼

Gross Payment

Withheld amount

Country

Select a Country ▼

Explanation

Select an explanation

Provide details if any explanation is "other"

Add Payment

Figure 3: Additional section for outbound payments protective measures

## 1.3 Interest Limitation

Question 1.25 in the interest limitation section now allows for the input of 5 additional companies

1.25 If the answer to 1.24 is yes, please provide the following details relating to the payment

Name of the company the payment was made to

Tax reference number of the recipient

Amount of the payment

Additional Companies

Figure 4: Additional companies can now be added to 1.25

The limit on amounts that can be entered has been increased in some fields in the Interest Limitation section

Fields 1.12 and 1.13 can accommodate a number up to and including €999,999,999,999.

|   |                      |
|---|----------------------|
| 1.12 Group EBITDA (Mandatory if the answer to 1.11 is "yes". Otherwise optional)                    | <input type="text"/> |
| 1.13 Group exceeding borrowing costs (Mandatory if the answer to 1.11 is "yes". Otherwise optional) | <input type="text"/> |

Figure 5: Updated limits in 1.12 & 1.13

Fields 1.29 and 1.30 can accommodate a number ranging from - €999,999,999,999 to €999,999,999,999

|  |                      |
|--|----------------------|
| 1.29 The amount in respect of equity in the calculation of the equity ratio (Mandatory if the answer to 1.28 is "yes". Otherwise optional)       |                      |
| Interest group   | <input type="text"/> |
| Worldwide Group  | <input type="text"/> |
| 1.30 The amount in respect of total assets in the calculation of the equity ratio (Mandatory if the answer to 1.28 is "yes". Otherwise optional) |                      |
| Interest group   | <input type="text"/> |
| Worldwide Group  | <input type="text"/> |

Figure 6: Fields 1.29 & 1.30 have updated limits

Fields 1.34 to 1.39 can accommodate a number up to and including €999,999,999,999.

|   |                      |
|---|----------------------|
| 1.34 EBITDA of the interest group (Mandatory if the answer to 1.26 and 1.28 is "no". Otherwise optional)                    | <input type="text"/> |
| 1.35 Allowable amount of the interest group (Mandatory if the answer to 1.26 and 28 is "no". Otherwise optional)            | <input type="text"/> |
| 1.36 Exceeding borrowing costs of the interest group (Mandatory if the answer to 1.26 and 1.28 is "no". Otherwise optional) | <input type="text"/> |
| 1.37 Disallowable amount of the interest group (Mandatory if the answer to 1.26 and 1.28 is "no". Otherwise optional)       | <input type="text"/> |
| 1.38 Interest spare capacity of the interest group (Mandatory if the answer to 1.26 and 1.28 is "no". Otherwise optional)   | <input type="text"/> |
| 1.39 Limitation spare capacity of the interest group (Mandatory if the answer to 1.26 and 1.28 is "no". Otherwise optional) | <input type="text"/> |

Figure 7: updated limits in 1.34 to 1.39

## 1.4 Group Relief surrender of losses

Information relating to the treatment of losses under Section 403 and 404 can be found [here](#)

New section has been introduced to record losses surrendered to another company.

**Surrender of Losses**

To Enter or Edit Details of Losses Surrendered, please click the Surrender of Losses button.

Indicate, by inserting X in appropriate box, if any surrender of relevant leasing losses or capital allowances arises in respect of machinery or plant.

Click the 'Add details' button to add or amend details of relevant leasing losses or capital allowances surrendered in respect of machinery or plant

Surrender of Losses

☐

Add Details

Figure 8: New section for surrender of losses to another company

When the “Surrender of Losses” button is clicked, another section will open and details of the company to which the losses have been surrendered can then be entered

**Group Relief - Surrender of Losses, etc.**

**Surrender of Losses, etc. - Company 1**

Name of company to which loss surrendered

Irish Tax Ref. No.

If the relief being surrendered is in respect of Qualifying Assets, please tick the box.

Nature of Relief: (Please state whether surrender of Losses, Capital Allowances, Management Expenses, Charges, Non-Trade Charges, Research and Development Expenditure)

Amount Surrendered €

Click the 'Add Company' button to add another Company. You may add up to a maximum of 100 Companies

Please click on the Back to Company Details button to return to the Company Details panel

Clear

☐

Add Company

Back to Company Details

Figure 9: New section to enter details of losses surrendered



When the “Add Details” button is clicked a separate section will open to record or edit details of the relevant leasing losses or capital allowances

**Provide the following details in respect of the leasing losses or capital allowance arising in respect of machinery or plant that are being surrendered.**

**Company - 1**

Name of company to which loss/allowance is surrendered

Irish Tax Reference Number

Nature of Relief

Amount Surrendered

€

Confirm the qualifying Sec. 403(1)(d)(ii) activity(ies) of the recipient, by ticking the relevant boxes:

(a) Clause I activities

☐

(b) Clause II activities

☐

Clause IIA activities

☐

(c) Clause III activities

☐

(d) Clause IV activities

☐

Clause IVA activities

☐

Clause IVB activities

☐

Click the 'Add Company' button to add another Company. You may add up to a maximum of 100 Companies

Add Company

Please click on the Back to Company Details button to return to the Company Details panel

Back to Company Details

Figure 10: New section to enter details of leasing losses or capital allowances

This information will include which qualifying section 403(1)(d)(ii) activity applies.

## 1.5 Group Relief Claim to losses

Information relating to the treatment of losses under Section 403 and 404 can be found [here](#)

New section has been introduced to record losses claimed which have been surrendered by another company

**Claim to Losses, etc**

To Enter or Edit Details of Losses Claimed, please click the Claim to Losses button.

Indicate, by inserting X in appropriate box, if any claim of relevant leasing losses or capital allowances arises in respect of machinery or plant.

Click the 'Add details' button to add or amend details of relevant leasing losses or capital allowances claimed in respect of machinery or plant.

Claim to Losses

☐

Add Details

Figure 11: New section for claim to losses surrendered by another company

When the “Claim to Losses” button is clicked, another section will open and details of the company from which the losses are claimed can then be entered

**Group Relief - Claim to Losses, etc.**

**Claim to Losses, etc. - Company 1**

Name of company from which loss claimed

Irish Tax Ref. No.

If the relief being claimed is in respect of Qualifying Assets, please tick the box.

Nature of Relief: (Please state whether surrender of Losses, Capital Allowances, Management Expenses, Charges, Non-Trade Charges, Research and Development Expenditure)

Amount Claimed €

Click the 'Add Company' button to add another Company. You may add up to a maximum of 100 companies

Please click on the Back to Company Details button to return to the Company Details panel

Clear

☐

Add Company

Back to Company Details

Figure 12: New section to enter details of losses claimed

When the “Add Details” button is clicked a separate section will open to record or edit details of the relevant leasing losses or capital allowances being claimed

**Provide the following details in respect of the leasing losses or capital allowance arising in respect of machinery or plant that are being claimed.**

**Comapny - 1**

Name of company to which loss/allowance is claimed

Irish Tax Reference Number

Nature of Relief

Amount Claimed €

Confirm the qualifying Sec. 403(1)(d)(ii) activity(ies) of the claimant, by ticking the relevant boxes:

(a) Clause I activities ☐

(b) Clause II activities ☐

Clause IIA activities ☐

(c) Clause III activities ☐

(d) Clause IV activities ☐

Clause IVA activities ☐

Clause IVB activities ☐

Click the 'Add Company' button to add another Company. You may add up to a maximum of 100 Companies

Please click on the Back to Company Details button to return to the Company Details panel

Figure 13: New section to enter details of leasing losses or capital allowances claimed

This information will include which qualifying section 403(1)(d)(ii) activity applies

## 1.6 S299 Leases agreed with Corporate Lessees

Details of Allowances to Lessees and Lessors are contained in Part 9 the Principal Provisions Relating to Relief for Capital Expenditure and can be found [here](#).

A new section has been added to capture details of leases agreed with Corporate Lessees

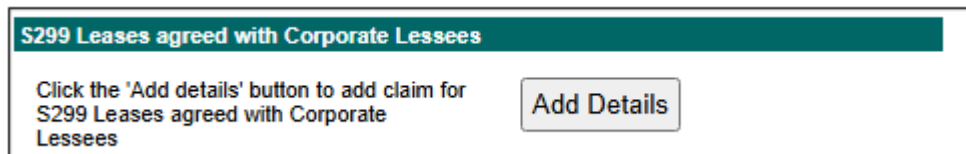


Figure 14: New section to enter details of S299 Leases with Corporate Lessees

When the “Add Details” button is clicked a separate section will open to record or edit details of the lease agreed with the Corporate lessee.

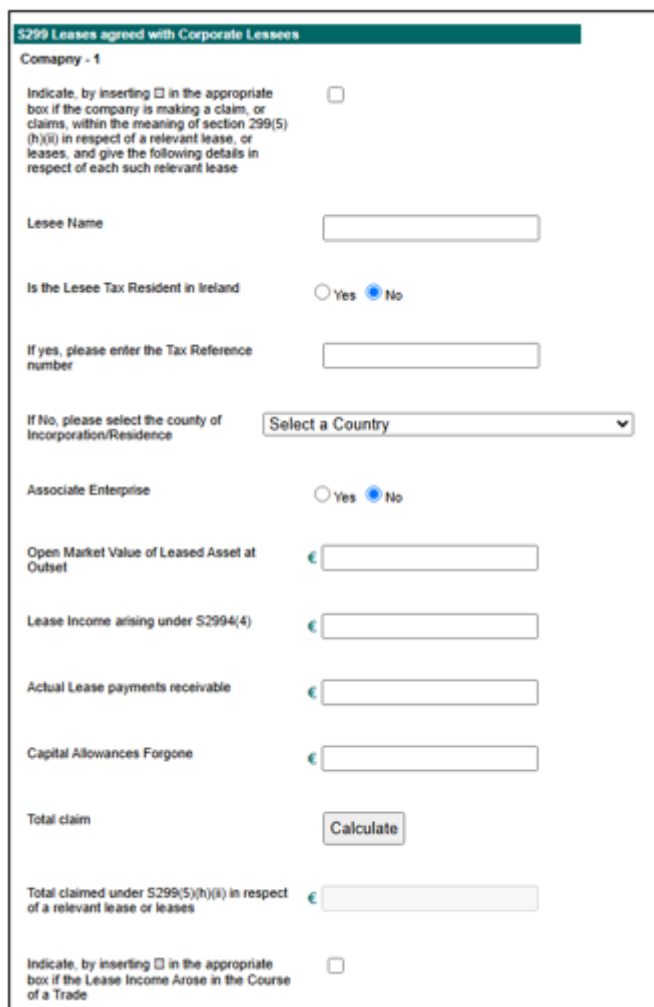


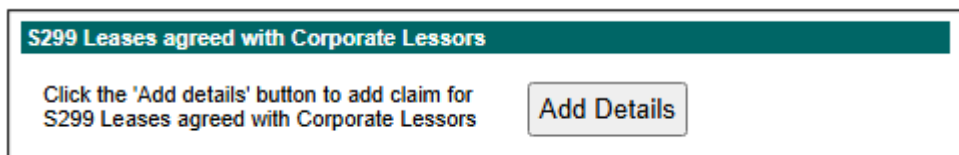
Figure 15: New section to enter details of lease agreed with Corporate Lessees

If the initial tick box at the top of the section is ticked then the subsequent questions in relation to the Lessee must be answered.

## 1.7 S299 Leases agreed with Corporate Lessors

Details of Allowances to Lessees and Lessors are contained in Part 9 the Principal Provisions Relating to Relief for Capital Expenditure and can be found [here](#)

A new section has been added to capture details of leases agreed with Corporate Lessees.



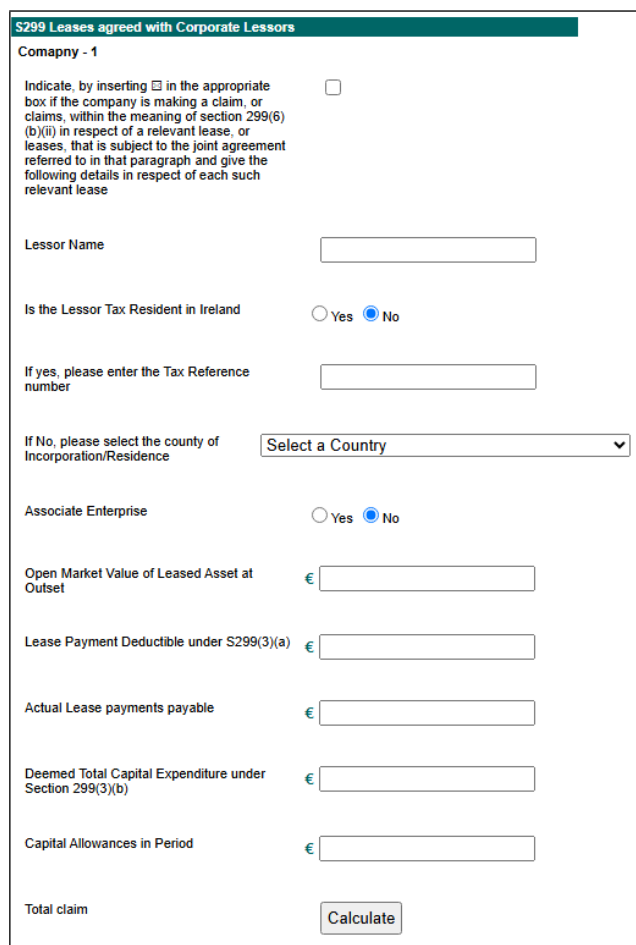
**S299 Leases agreed with Corporate Lessors**

Click the 'Add details' button to add claim for S299 Leases agreed with Corporate Lessors

**Add Details**

Figure 16: New section to enter details of lease agreed with Corporate Lessors

When the “Add Details” button is clicked a separate section will open to record or edit details of the lease agreed with the Corporate lessor.



**S299 Leases agreed with Corporate Lessors**

Company - 1

Indicate, by inserting ☐ in the appropriate box if the company is making a claim, or claims, within the meaning of section 299(6) (b)(ii) in respect of a relevant lease, or leases, that is subject to the joint agreement referred to in that paragraph and give the following details in respect of each such relevant lease

Lessor Name

Is the Lessor Tax Resident in Ireland ☐ Yes ☒ No

If yes, please enter the Tax Reference number

If No, please select the county of Incorporation/Residence

Associate Enterprise ☐ Yes ☒ No

Open Market Value of Leased Asset at Outset €

Lease Payment Deductible under S299(3)(a) €

Actual Lease payments payable €

Deemed Total Capital Expenditure under Section 299(3)(b) €

Capital Allowances in Period €

Total claim



Total claimed under S299(5)(b)(ii) in respect of a relevant lease or leases €

Click the 'Add Company' button to add another Company. You may add up to a maximum of 100 Companies

Please click on the Back to Company Details button to return to the Company Details panel

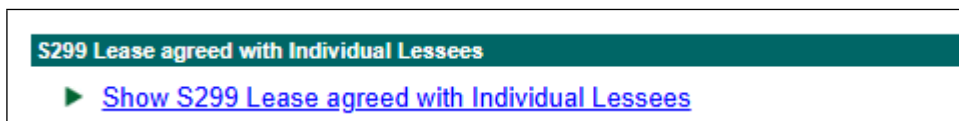
Figure 17: New section to enter details of lease agreed with Corporate Lessors

If the initial tick box at the top of the section is ticked then the subsequent questions in relation to the Lessor must be answered.

## 1.8 S299 Leases agreed with Individual Lessees

Details of Allowances to Lessees and Lessors are contained in Part 9 the Principal Provisions Relating to Relief for Capital Expenditure and can be found [here](#)

A new section has been added to capture details of leases agreed with Corporate Lessees.



**S299 Lease agreed with Individual Lessees**

► [Show S299 Lease agreed with Individual Lessees](#)

Figure 18: New section for leases agreed with Individual Lessees

When the link is clicked, a separate section will open to record or edit details of the lease agreed with the Individual Lessee.

**S299 Lease agreed with Individual Lessees**

▼ Hide S299 Lease agreed with Individual Lessees

Indicate, by inserting X in the appropriate box if the company has made an election(s) under Section 299(3)(b) in respect of a relevant lease, or leases. Where a joint election has been made, please provide the following ☐

Number of Leases in respect of which an election was made. €

Are any Lessees Associated Enterprises of the Lessor? [Y/N] ☐ Yes ☐ No

Total Lease Income Arising Under section 299(4) €

Indicate, by inserting X in the appropriate box if the Lease Income Arose in the Course of a Trade or otherwise ☐

Total Actual Lease Income Receivable €

Total Open Market Value of Affected Leased Assets at Outset €

Total Capital Allowances Foregone €

Figure 19: Expanded section to enter details of leases agreed with Individual Lessees

## 2 Trading Results

### 2.1 Trade Profits at 12.5%

If there is an entry at (e) Machinery and Plant – farm safety equipment (section 285D TCA 1997), then the qualifying certificate number issued by the Dept. Agriculture, Food and Marine must be entered.

|   |         |
|---|---------|
| (e) Machinery and Plant - farm safety equipment (section 285D TCA 1997)                           | € 50000 |
| (i) The qualifying certificate number(s) issued by the Department of Agriculture, Food and Marine |         |
| <b>This is a mandatory field.</b>   |         |

Figure 20: Qualifying certificate number must be provided

Group Relief S396D has been removed from the carry back of losses section

|   |   |
|---|---|
| <b>Carry back of losses</b>                                     |   |
| Loss claimed under Sec. 396A(3) TCA 1997 (carry back of losses) | € |

Figure 21: Group Relief S396D removed from carry back of losses

### 2.2 Profits from Qualifying Assets under Chapter 5 of Part 29 TCA 1997

Group Relief S396D has been removed from the carry back of losses section

|   |   |
|---|---|
| <b>Carry back of losses</b>   |   |
| Relief under Sec.396A(3)TCA 1997 in respect of Qualifying Assets (carry back of losses) | € |

Figure 22: Group Relief S396D removed from carry back of losses

### 2.3 Trade Losses

Group Relief S396D has been removed from the Carry Back of Losses section

|  |   |
|--|---|
| <b>Carry back of losses</b>  |   |
| Loss claimed under Sec. 396(2) TCA 1997 in respect of Excepted Trades (carry back of losses) | € |

Figure 23: Group Relief S396D removed from carry back of losses



### 3 Extracts from accounts

#### 3.1 iXBRL text changes

The text on the iXBRL filing options has been updated to reflect revenue's changing case base.

| Extracts from Accounts   |  |
|--|--|
| <b>Obligation to file Electronic Financial Statements</b>  |  |
| <p><i>Mandatory iXBRL filing applies to all Corporation Taxes filers who cannot claim a waiver because they do not meet all three of the iXBRL deferral criteria set out in option 3 below. All companies may claim a waiver from mandatory iXBRL filing if they meet the criteria set out in options 4 and 5 below. Additionally, all companies may elect to file iXBRL voluntarily.</i></p> <p><i>If you are mandated to file electronic financial statements or you elect to file electronic financial statements, and fail to do so by the specific return filing date, the Corporation Tax return cannot be deemed to be fully or correctly completed until both the FormCT1 and electronic financial statements have been filed.</i></p> <p><i>If you select option 3 below and your company does not meet all three criteria, the Corporation Tax return cannot be deemed to be fully or correctly completed until both the FormCT1 and electronic financial statements have been filed.</i></p> <p><i>In the event that the electronic financial statements are submitted after the specified return filing date, the company may be liable to a surcharge under section 1084 TCA 1997.</i></p> <p><i>It should be noted also that the right to a repayment of tax only arises where a valid claim has been made. In the context of Corporation Tax repayments, Revenue does not consider that a valid claim has been made until any iXBRL financial statements required to be filed have been so filed. A repayment of Tax will not be made if there are any Tax returns outstanding. A CT return will be deemed as outstanding, if any iXBRL financial statements required to be filed, have not been so filed.</i></p> <p><i>The late filing or non filing of any iXBRL financial statements required to be filed will also delay or prevent the issue of a Tax Clearance Certificate.</i></p> <p><i>To submit Financial statement in iXBRL format or to amend Financial statements already submitted, go to the Manage Financial Statements option on the Client Services/Agent Services Screen. Multiple Financial Statements in iXBRL format may also be submitted via this option on the Agent Services Screen.</i></p> |  |
| <b>Select one of the iXBRL options below:</b>  |  |
| Option 1)  | <p>I am not mandated to file Financial Statements in iXBRL format but I elect to do so. <input type="checkbox"/></p>   |
| Option 2)  | <p>I am mandated to file financial statements in iXBRL format and I am not excluded under options 3,4 or 5 below. <input type="checkbox"/></p>   |
| Option 3)  | <p>I am not mandated to file financial statements in iXBRL format because each of the following three criteria apply to me and I am claiming an exclusion <input type="checkbox"/></p> <ol style="list-style-type: none"> <li>1. The Statement of Financial Position / Balance sheet total (aggregate of assets without deduction of liabilities) of the company does not exceed £, ~4.4 million.</li> <li>and</li> <li>2. The amount of the turnover of the company does not exceed £, ~8.8 million.</li> <li>and</li> <li>3. The average number of persons employed by the company, calculated in accordance with s317 of the Companies Act 2014, does not exceed 50.</li> </ol> |
| Option 4)  | <p>The company is inactive and there is no income or expenses on the Statement of Profit or Loss and there is a Statement of Financial Position / Balance Sheet movement of less than £, ~500. <input type="checkbox"/></p>  |
| Option 5)  | <p>The company is in liquidation (not a voluntary liquidation where there are net assets for distribution). <input type="checkbox"/></p>   |

Figure 24: New text on iXBRL filing

## 4 Irish Rental Income

### 4.1 Non-Resident Landlord Withholding Tax

This section is replacing the previous Non-Resident landlord section. The TDM Non Resident Landlord Withholding Tax [45-01-04A](#) includes guidance on the operation of NLWT. This new section contains prepopulated fields containing Rentgal Notifications where NLWT was withheld from the filer.

Note: If the values entered in the Gross value of NLWT deductions for 2024 differ from the value in the pre-populated table or NLWT system, an advisory error message is presented.

Non-resident Landlord Withholding Tax

Ensure you have claimed all NLWT deducted in the NLWT system, only claimed NLWT will appear in the pre-populated table.

Gross value of the Rental Income subject to NLWT for Accounting period ending in 2024 €

Gross value of NLWT deductions for Accounting period ending in 2024 €

If you are a non-resident landlord, and your tenant has withheld tax from the rent from 1 Jan 2023 to 30 Jun 2023 under the previous non-resident withholding system managed by the R185 paper form, state:-

**As a non-resident landlord:**

Click on the checkbox if this form is being completed by a Collection Agent

Click on the checkbox if the tax was withheld by your tenant on the gross rents (Note you must submit a Form R185 to Revenue in support of your claim for a credit for this tax)

PPSN/Tax reference number of Tenant 1 (this will be shown on the form R185 given to you by the tenant as proof of tax withheld; you will need to retain that form as proof of tax withheld)

Amount of Irish tax withheld in the period from 1/01/2023 to 30/06/2023 and within the Accounting period €

Click the 'Add another tenant' button to add details of further tenants.

Country of Residence of the non-resident company

Add another tenant

Select a Country

Figure 25: Revised section for Non Resident Landlord Withholding Tax

If the filer has claimed this credit for withheld NLWT, the calculation screen will update to reflect this.

| Assessment to Corporation Tax - Amounts Assessable |                        |
|--|------------------------|
| Rental Income                                      | 10000                  |
| <b>Total Income</b>                                | <b>10000</b>           |
| Taxable Income after Deductions                    |                        |
| Taxable Income                                     | 10000                  |
| Corporation Tax @ 25 %                             | 10000 @ 25 % = 2500.00 |
| <b>Total</b>                                       | <b>2500.00</b>         |
| Total Credits - Amounts Allowed                    |                        |
| NLWT Credit paid                                   | 1000                   |
| <b>Total Credits</b>                               | <b>1000</b>            |
| Payable under deduction of Tax - Amounts Allowed   |                        |

Figure 26: Calculate screen including NLWT credit

## 5 Irish Investment and Other Income

### 5.1 Leasing Profits

Information relating to the treatment of Capital Allowances under Section 403 and 404 can be found [here](#)

The section relating to profits arising from non-trading leasing activity has been expanded to capture more details in relation to capital allowances

| Leasing profits  |  |
|--|--|
| Profits arising from non-trading leasing activity  | € <input type="text"/>                   |
| Indicate, by inserting <input type="checkbox"/> in the appropriate box if the company has capital allowances arising from non-trading leasing activity and provide the following information with regard to the capital allowances arising from that separate trade: | <input type="checkbox"/>                 |
| (i) Amount of Capital Allowances Forward From Prior Accounting Period  | € <input type="text"/>                   |
| (ii) Amount of Capital Allowances Arising in this Accounting Period  | € <input type="text"/>                   |
| (ii)(i) Amount of Wear and Tear Allowances   | € <input type="text"/>                   |
| (ii)(ii) Total Balancing Allowance (Or Charge)   | € <input type="text"/>                   |
| (iii) Amount of Capital Allowances Utilised in this Accounting Period  | € <input type="text"/>                   |
|  | <input type="button" value="Calculate"/> |
| (iv) Amount of Capital Allowances not used in this period and available for Carry Forward to Succeeding Accounting Period(s)   | € <input type="text"/>                   |

Figure 27: Expanded section to capture capital allowances relating to leasing activity.

## 5.2 Qualifying Financing Companies

Details relating to QFC's under S76E can be found [here](#)

A new section has been added to capture details of external lenders, loans and recipients. If the first tick box is ticked then details of lenders and loans must be entered.

| Qualifying Financing Companies   |   |
|--|---|
| Indicate, by inserting X in the appropriate box, if the company is a Qualifying Financing Company within the meaning of section 75E. | <input type="checkbox"/>                      |
| Where a deduction is claimed for annual interest paid on an external loan, provide the following:                                    |   |
| External Lender Name   | <input type="text"/>                          |
| If the External Lender is Irish Resident, please enter the Tax Reference number  | <input type="text"/>                          |
| If the External Lender is not Irish Resident, please enter the country of incorporation/residence                                    | <input type="text" value="Select a Country"/> |
| External Loan Principal Amount   | <input type="text"/>                          |
| External Loan Balance Outstanding  | <input type="text"/>                          |
| External Loan Interest Deductible  | <input type="text"/>                          |
| Please enter details of each matched recipient(s) in relation to this loan   |   |
| Matched Relevant Loan Recipient Name   | <input type="text"/>                          |
| If the matched recipient is Irish Resident, please enter the Tax Reference number  | <input type="text"/>                          |
| If the matched recipient is not Irish Resident, please enter the country of incorporation/residence                                  | <input type="text" value="Select a Country"/> |
| Loan Principal Amount  | <input type="text"/>                          |
| External Loan Balance Outstanding  | <input type="text"/>                          |
| Interest Receivable  | <input type="text"/>                          |
| <input type="button" value="Add Recipients"/>  |   |
| <input type="button" value="Add Loan"/>  |   |
| Income from Unmatched Loans or Unmatched Portions of Loans   | <input type="text"/>                          |
| Income from Unmatched Loans or Unmatched Portions of Loans   | <input type="text"/>                          |
| Click the "Calculate Button" to get the Gross Qualifying Financial Company Income  | <input type="button" value="Calculate"/>      |
| Gross Qualifying Financial Company Income  | <input type="text"/>                          |
| Click the "Calculate Button" to get the Net Qualifying Financial Company Income  | <input type="button" value="Calculate"/>      |
| Gross Qualifying Financial Company Income  | <input type="text"/>                          |

Figure 28: New section relating to qualifying finance companies under S76E

Note: Only one of Lender Tax Reference number or Country of Incorporation/Residence can be entered.

Filers can enter details for multiple recipients by clicking on the “Add Recipient button”

Filers can enter details of more loans by clicking on the “Add Loan” button. This should allow for up to 50 loans

If filers click on the first calculate button they will be shown the Gross Qualifying Financial Company Income. This is the total of Interest receivable from the ‘Recipient Details’ section plus the amount in the ‘Income from unmatched loans or unmatched portions of loans’ field

The second calculate button will give the Net Qualifying Financial Company Income. This is the ‘Gross qualifying financial income’ less ‘Total external interest deductible’ The total external interest deductible will be the total from all loans entered.

### 5.3 Digital Games Tax changes

Guidance on Digital Games Tax Credit is set out in TDM [15-02-07](#). The first thing to note is that the Digital Games Tax Credit can now be claimed in input mode and amend mode, whereas up to now it could only be claimed in amend mode. The main change to Digital Games Tax is as follows:

For accounting periods commencing before 1 January 2024, the CT liability of the company is reduced by the amount of the credit. Where the relief is greater than the CT due, the excess amount is paid to the company. For accounting periods commencing on, or after, 1 January 2024, the credit is not offset against the company’s CT liabilities. The company must elect to have the credit treated as an overpayment for offset against tax liabilities or repaid directly to the company.

The credit per digital game is 32% of the lowest of:

- eligible expenditure
- 80% of total qualifying expenditure
- **or**
- €25 million.

Therefore, the total of a current interim claim plus the total of previous interim claims cannot exceed 32% of €25 million. There is no change to the existing Digital Games Interim Claim or Final Claim sections for accounting periods commencing before 1 January 2024. For accounting periods commencing on or after 2024, there is a new section which can be opened by clicking on the Digital Games Relief 2024 button



Figure 29: Click this button to open the new DGT section

When the button is clicked, the new section will open and in this section the credit can be claimed as an overpayment or set against tax liabilities.

(x) Provide details of the amount at (ix), or any portion of such amount to be:

(A). Treated as an overpayment of tax, for the purposes of section 960H, as set out in section 481A(22)(a) TCA 1997? If yes, please include the amount or any portion of such amount ☐

Amount

A(i). The amount of the overpayment as set out in (x)(A) which is to be offset against the company's corporation tax payable for the accounting period for preliminary tax purposes under section 481A(22F).

B. Paid to the company by the Revenue Commissioners, as set out in section 481A(22)(b) TCA 1997. If yes, please state the amount or any portion of such amount. ☐

Amount

Figure 30: New fields on Interim Digital Games Tax section for 2024

The following material is either exempt from or not required to be published under the Freedom of Information Act 2014.

[...]

## 5.6 Updates to Acknowledgement/Assessment

Where a filer has made a Digital Games Tax claim under the new rules, the Revenue output (letter of acknowledgement or the notice of assessment) includes a reference to the DGT Claim (i) on the first (summary) page and (ii) on the detail where Panel 4 is referenced.

## 6 Capital Gains

### 6.1 Gains relating to the disposal of lease machinery or plant

New fields have been added to the Capital Gains panel to capture the disposal of leased machinery or plant

Indicate by inserting X in the appropriate box if company has disposed of leased machinery or plant in the Accounting Period. Where such a disposal (for disposals) has been made, please provide the following: ☐

(a) Number of Disposals made €

(b) Net Chargeable Gain or Loss Arising €

(c) Total Profits/(Losses) Appropriated into Trading Stock and subject to Section 596(3) Election €

Figure 33: New fields for the disposal of leased machinery or plant

If the tickbox above is ticked the three new fields must be completed.

## 7 Deductions, Reliefs and Credits

### 7.1 Relief on Value Basis

Fields relating to S396D group relief have been removed from the carry back of losses section.

**Carry back of losses**

Trading Losses Carried Back (Sec.396B) €

Trading Losses in respect of Qualifying Assets Carried Back (Sec.396B) €

Figure 34: S396D group relief removed from this section

## 8 Research and Development Credit

### 8.1 Section 766

The first four fields relating to 766(2) & 766(2)(a) have been removed as claim cannot be made under these subsections in an accounting period commencing on or after 1 January 2023

Amount of credit claimed under Sec.766 in this accounting period at 25% (include here any amounts surrendered under Sec. 766 (2A))

If any amount refers to expenditure on machinery & plant, enter that amount here.

Amount of credit included that has been surrendered in accordance with Sec.766(2A).

In relation to the amount of credit surrendered, please enter details of each employee receiving the credit

Figure 35: The four fields above have been removed

There have been a number of further updates to the R&D S776 panel.

- Text has been amended in relation to unused credit carried forward under S766(4B)(b)(ii)(I) TCA 1997 and S766(4B)(b)(iii)(I) TCA 1997.
- Reference to transitional amounts in accordance with 766(4)(D) have been removed.
- Claim for repayment of excess Research and Development Tax credit in accordance with subsection 766(4B).
  - The field for first instalment has been removed.
  - The text in the second and third instalment fields has been amended to remove reference to transitional rules 766(4D)
  - Transitional measures-Claim for payment of excess Research and Development Tax credit using transitional measures under s766(4D) section has been removed.



|   |                        |
|---|------------------------|
| Amount of unused credit claimed under Sec. 766 TCA 1997 carried forward from a previous accounting period excluding unused credit carried forward under Sec. 766(4B)(b)(ii)(I) and Sec. 766(4B)(b)(iii)(I) TCA 1997                     | € <input type="text"/> |
| Amount of unused credit carried forward under Sec 766(4B)(b)(ii)(I) TCA 1997  | € <input type="text"/> |
| Amount of unused credit carried forward under Sec 766(4B)(b)(iii)(I) TCA 1997   | € <input type="text"/> |
| Amount of unused credit carried forward under Sec.766(4C) TCA 1997  | € <input type="text"/> |
| Please enter the tax number of the predecessor company  |                        |
| Company 1   | <input type="text"/>   |
| Company 2   | <input type="text"/>   |
| Company 3   | <input type="text"/>   |
| <b>Claim for payment of excess Research &amp; Development Tax Credit in accordance with subsection 766(4B)</b>  |                        |
| Second Instalment - Amount of claim under Section 766(4B)(b)(ii)(II) TCA 1997.  | € <input type="text"/> |
| Third Instalment - Amount of claim under Sec. 766(4B)(b)(iii)(II) TCA 1997.   | € <input type="text"/> |
| Please go into section 766A and click the calculate button to claim the total research and development credit due and the total research and development credit due in this accounting period in accordance with sections 766 and 766A. |                        |
| Please click on the Back to Research and Development Credit button to return to the Research and Development Credit panel   |                        |
| <a href="#">Back to R &amp; D Credit</a>  |                        |

Figure 36: R&amp;D S766 panel for 2024

## 8.2 Section 766A

There have been a number of further updates to the R&D S776A panel.

- The field for credit claimed on the Amount of unused credit carried forward under Sec. 766A has been removed.
- The fields for unused credit carried forward under Sec. 766A(4B)(b)(ii)(I) TCA 1997 & Sec. 766A(4B)(b)(iii)(I) TCA 1997 have been amended to remove reference to transitional amount claimed in accordance with section 766A(4C).
- The four fields relating to Group Relief under Section 766A have been removed.
- Claim for payment of excess R&D credit in accordance with subsection 766A(4B).
  - First instalment under 766A(4B)(b)(i) has been removed.
  - The second and third instalments text has been amended to remove reference to transitional rules Sec.766A(4C).

- All the fields relating to 'Transitional measures- Claim to payment of excess Research and Development tax credit in accordance with section 766A(4C)' have been removed

|  |   |
|--|---|
| Amount of unused credit claimed on the construction or refurbishment of a building under Sec. 766A TCA 1997 carried forward from a previous accounting period excluding unused credit carried forward under Sec. 766A(4B)(b)(ii)(I) TCA 1997 and Sec. 766A(4B)(b)(iii)(I) TCA 1997 | € <input type="text"/>                                  |
| Amount of unused credit carried forward under Sec. 766A(4B)(b)(ii)(I) TCA 1997   | € <input type="text"/>                                  |
| Amount of unused credit carried forward under Sec. 766A(4B)(b)(iii)(I) TCA 1997  | € <input type="text"/>                                  |
| Amount of unused credit carried forward under Sec. 766A(3A)  | € <input type="text"/>                                  |
| Please tick the box to confirm that the building or structure, which was the subject of the claim by the predecessor company, has been transferred to the successor company in accordance with Sec. 766A(3A)   | <input type="checkbox"/>                                |
| Total Research and Development credit  | <input type="button" value="Calculate"/>                |
| Total Research and Development credit claimed in this accounting period, in accordance with section 766 and 766A   | € <input type="text"/>                                  |
| Amount of Research and Development credit being clawed back  | € <input type="text"/>                                  |
| Total Research and Development credit after Clawback   | <input type="button" value="Calculate"/>                |
| Total Research and Development credit now due in this accounting period, in accordance with section 766 and 766A   | € <input type="text"/>                                  |
| <b>Claim for payment of excess Research &amp; Development Tax Credit in accordance with subsection 766A(4B)</b>  |   |
| Second Instalment - Amount of claim under Section 766A(4B)(b)(ii)(I) TCA 1997.   | € <input type="text"/>                                  |
| Third Instalment - Amount of claim under Sec. 766A(4B)(b)(iii)(II) TCA 1997.   | € <input type="text"/>                                  |
| Please click on the Back to Research and Development Credit button to return to the Research and Development Credit panel  | <input type="button" value="Back to R &amp; D Credit"/> |

Figure 37: R&amp;D S766A panel for 2024

### 8.3 Section 766C

Research and Development corporation tax credit under section 766C, has some new fields added. A field has been added to capture R&D credit claimed at 30% which applies in respect of accounting period commencing on or after 1 January 2024.

A new tick box has been included to indicate if the company has completed the pre-filing notification. This applies to accounting period commencing on or after 1 January 2024 and are claiming the credit for the first time or have not claimed the credit in the previous three years. The

pre-filing notification must be filed through MyEnquiries via ROS. The MyEnquiries category used should be Corporation Tax(CT) and the sub-category of R&D Pre-filing notification.

|   |   |                      |
|---|---|----------------------|
| <p>Amount of the Research and Development corporation tax credit claimed under section 766C TCA in this accounting period at 30% (the 30% rate only applies in respect of an accounting period commencing on or after 1 January 2024) (the tax credit should be in respect of all qualifying expenditure attributable to the company in this accounting period)</p> | € | <input type="text"/> |
| <p>Where applicable did the company complete the pre-filing notification to Revenue <input type="checkbox"/></p>  |   |                      |

Figure 38: R&D 766C new fields for 30% rate and pre-filing notification

A new section has been added for Tax Credit forward amounts relating to claim made in the period before the prior period under section 766C TCA 1997

|  |   |                      |
|--|---|----------------------|
| <p><b>Tax credit forward amounts relating to claim made in the period before the prior period under section 766C TCA 1997</b></p>  |   |                      |
| R&D tax credit claimed (under section 766C) in the period before the prior period  | € | <input type="text"/> |
| Amount of the R&D tax credit which was claimed as a first instalment under section 766C(6)(a)  | € | <input type="text"/> |
| Amount of the R&D tax credit which was claimed as a second instalment under section 766C(6)(b)   | € | <input type="text"/> |
| Balance of the R&D corporation tax credit (under section 766C(6)(c)) in respect of a R&D corporation tax credit claim (under section 766C) made in the period before the prior period (i.e. amount of R&D corporation tax credit less first instalment and second instalment claimed.) | € | <input type="text"/> |

Figure 39: R&D 766C new section for claims made in the period before the prior period

There is a new field in the section for 1<sup>st</sup> Instalment under section 766C. This is to cater for the new threshold amount of €50,000 (or 50% of the amount of credit claimed) which applies to accounting periods commencing on or after 1 January 2024

|   |   |                      |
|---|---|----------------------|
| <p>First instalment, relating to a credit claimed in this accounting period, under section 766C(6)(a) TCA 1997. The first instalment is the greater of: (1) 50,000 or if lower, the amount of the credit claimed, or (2) 50% of the amount of the credit claimed. (The amount of 50,000 only applies in respect of an accounting period commencing on or after 1 January 2024).</p> | € | <input type="text"/> |
|---|---|----------------------|

Figure 40: R&D 766C new field for €50,000 threshold

There is a new section for a claim to 3<sup>rd</sup> Instalment under section 766C.

|   |                          |
|---|--------------------------|
| <b>Claim to 3rd instalment under section 766C</b>   |                          |
| Third Instalment - Amount due under section 766C(6)(c) TCA 1997   | € <input type="text"/>   |
| Provide the following details of the third instalment or any portion of such amount:  |                          |
| Indicate, by inserting x in the appropriate box if it is to be treated as an overpayment of tax, for the purposes of section 960H, as set out in section 766C(7)(a) TCA 1997? If yes, please include the amount or any portion of such amount | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if it is to be paid to the company by the Revenue Commissioners, as set out in section 766C(7)(b) TCA 1997? If yes, please state the amount or any portion of such amount.                    | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if the excess amount or any part of that amount to be surrendered to a key employee in accordance with section 766C(2) TCA 1997? If yes, please state the amount.                             | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |
| In relation to the amount of credit surrendered, please enter details of each employee receiving the R&D corporation tax credit   |                          |
| PPSN  | <input type="text"/>     |
| Amount  | <input type="text"/>     |

Figure 41: R&D 766C new section for third instalment

The amount of third instalment due must equal the sum of the amount selected to be treated as an overpayment of tax for the purposes of section 960H and the amount selected for repayment to the company under section 766C(7)(b).

The amount selected to be treated as an overpayment of tax for the purposes of section 960H will be offset first against outstanding liabilities and any excess will be refunded. The amount selected to be paid to the company under section 766C(7)(b) will be repaid directly to the company without any checks for outstanding liabilities.

There is a new section for Successor claim under section 766C (7A)

| Successor claim under section 766C (7A)   |                          |
|---|--------------------------|
| Amount of the Research and Development Corporation tax credit claimed by the predecessor company which is available to be claimed by the successor company under Sec.766C(7A) TCA 1997  | € <input type="text"/>   |
| Please enter the tax number of the predecessor company  |                          |
| Company 1   | <input type="text"/>     |
| Company 2   | <input type="text"/>     |
| Company 3   | <input type="text"/>     |
| First Instalment  | € <input type="text"/>   |
| Second Instalment   | € <input type="text"/>   |
| Third Instalment  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if it is to be treated as an overpayment of tax, for the purposes of section 960H, as set out in section 766C(7)(a) TCA 1997? If yes, please include the amount or any portion of such amount | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if it is to be paid to the company by the Revenue Commissioners, as set out in section 766C(7)(b) TCA 1997? If yes, please state the amount or any portion of such amount.                    | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |

Figure 42: R&D 766C new section for Successor claims

The amounts entered as first, second or third instalments cannot exceed to total amount of Research and Development Corporation Tax credit claimed by the successor company.

The amount selected to be treated as an overpayment of tax for the purposes of section 960H plus the amount selected for repayment to the company under section 766C(7)(b) cannot exceed the sum of the first, second and third instalments. The amount selected to be treated as an overpayment of tax for the purposes of section 960H will be first offset against outstanding liabilities and any excess will be refunded. The amount selected for repayment to the company under section 766C(7)(b) will be repaid directly to the company without any checks for outstanding liabilities.

## 8.4 Section 766D

Research and Development corporation tax credit claimed on the construction or refurbishment of a building under section 766D, has some new fields added.

A field has been added to capture R&D credit claimed at 30% which applies in respect of accounting period commencing on or after 1 January 2024.

A new tick box has been included to indicate if the company has completed the pre-filing notification. This applies to accounting period commencing on or after 1 January 2024 and to companies claiming the credit for the first time or have not claimed the credit in the previous three years. The pre-filing notification must be filed through MyEnquiries via ROS. The MyEnquiries category that should be used is Corporation Tax(CT) and the sub-category R&D Pre-filing notification.

|   |                          |                      |
|---|--------------------------|----------------------|
| Amount of the Research and Development corporation tax credit claimed on the construction or refurbishment of a building under section 766D in this accounting period at 30% (the 30% rate only applies in respect of an accounting period commencing on or after 1 January 2024) | €                        | <input type="text"/> |
| Where applicable did the company complete the pre-filing notification to Revenue  | <input type="checkbox"/> |                      |

Figure 43: R&D 766D new fields for 30% validation and pre-filing notification

A new section has been added for Tax Credit forward amounts relating to claim made in the period before the prior period under section 766C TCA 1997

|   |   |                      |
|---|---|----------------------|
| <b>Tax credit forward amounts relating to claim made in the period before the prior period under section 766D TCA 1997</b>  |   |                      |
| R&D tax credit claimed (under section 766D) in the period before the prior period   | € | <input type="text"/> |
| Amount of the R&D tax credit which was claimed as a first instalment under section 766D(5)(a)   | € | <input type="text"/> |
| Amount of the R&D tax credit which was claimed as a second instalment under section 766D(5)(b)  | € | <input type="text"/> |
| Balance of the R&D corporation tax credit in respect of a R&D corporation tax credit claim (under section 766D) made in the period before the prior period (i.e. amount of R&D corporation tax credit less first instalment and second instalment claimed.) | € | <input type="text"/> |

Figure 44: R&D 766D new section for claims made in the period before the prior period

There is a new section for claim to 3<sup>rd</sup> Instalment under section 766

| Claim to 3rd instalment under section 766D   |                          |
|--|--------------------------|
| Third Instalment - Amount due under section 766D(5)(c) TCA 1997  | € <input type="text"/>   |
| Provide the following details of the third instalment or any portion of such amount:   |                          |
| Indicate, by inserting x in the appropriate box if it is to be treated as an overpayment of tax, for the purposes of section 960H, as set out in section 766D(6)(a) TCA 1997? If yes, please include the amount or any portion of such amount  | <input type="checkbox"/> |
| Amount   | € <input type="text"/>   |
| Insert x in the appropriate box if the excess credit (as defined under section 766D(2)) which is to be treated as an overpayment (within the meaning of section 960H) been allocated to this company from another group company (i.e. the excess credit is being claimed by this company)? | <input type="checkbox"/> |
| Amount   | € <input type="text"/>   |
| Enter tax reference number of the company from which the excess credit has been surrendered  |                          |
| TRN  | <input type="text"/>     |
| Insert x in the appropriate box if the excess credit (as defined under section 766D(2)) which is to be treated as an overpayment (within the meaning of section 960H) been surrendered to another group company (i.e. the excess credit is surrendered to a group company)?                | <input type="checkbox"/> |
| Amount   | € <input type="text"/>   |
| Enter tax reference number of the company from which the excess credit has been surrendered  |                          |
| TRN  | <input type="text"/>     |
| Indicate, by inserting x in the appropriate box if it is to be paid to the company by the Revenue Commissioners, as set out in section 766D(6)(b) TCA 1997? If yes, please state the amount or any portion of such amount.   | <input type="checkbox"/> |
| Amount   | € <input type="text"/>   |

Figure 45: R&D 766D new section for third instalment

The amount entered for the Third instalment amount due under section 766D(5)(c) must equal to the sum of:

- The amount selected to be treated as an overpayment under S960H
- Plus the amount to be repaid to the company
- Plus the amount allocated to this company by another group company
- Less any amount surrendered by this company to another group company.

There is a new section for Successor claim under section 766D(3A)

| Successor claim under section 766D (3A)   |                          |
|---|--------------------------|
| Amount of the Research and Development Corporation tax credit claimed by the predecessor company which is available to be claimed by the successor company under Sec.766D(3A) TCA 1997  | € <input type="text"/>   |
| Please enter the tax number of the predecessor company  |                          |
| Company 1   | <input type="text"/>     |
| Company 2   | <input type="text"/>     |
| Company 3   | <input type="text"/>     |
| First Instalment  | € <input type="text"/>   |
| Second Instalment   | € <input type="text"/>   |
| Third Instalment  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if it is to be treated as an overpayment of tax, for the purposes of section 960H, as set out in section 766C(7)(a) TCA 1997? If yes, please include the amount or any portion of such amount | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |
| Indicate, by inserting x in the appropriate box if it is to be paid to the company by the Revenue Commissioners, as set out in section 766C(7)(b) TCA 1997? If yes, please state the amount or any portion of such amount.                    | <input type="checkbox"/> |
| Amount  | € <input type="text"/>   |

Figure 46: R&D 766D new section for successor claims

The amounts entered as first, second or third instalments cannot exceed the total amount of Research and Development Corporation Tax credit claimed by the successor company.

The amount selected to be treated as an overpayment of tax for the purposes of section 960H plus the amount selected for repayment to the company under section 766D(6)(b) cannot exceed the



sum of the first, second and third instalments. The amount selected to be treated as an overpayment of tax for the purposes of section 960H will be first offset against outstanding liabilities and any excess will be refunded. The amount selected for repayment to the company under section 766D(6)(b) will be repaid directly to the company without any checks for outstanding liabilities.

NB: There is an error in the text of this section as it refers to 766C(7)(a) and 766C(7)(b) where it should refer to 766D(6)(a) and 766D(6)(b)

## 9 Close Company Surcharge

### 9.1 Surcharges (Section 440 and Section 441 TCA 1997)

A number of text updates have been made to this section:

- Text has been added at the top of the section “Where an election under s434(3A)(a) is being made the following panels should be completed”
- The text for making a joint election under section 434(3A) has been updated.
- Reference to making a distribution has been removed.
- A joint election (under s434(3A)(a)) is required, therefore both companies, the paying company and the receiving company respectively, should make their “election” on their respective CT1 returns.

Surcharges (Section 440 and Section 441 TCA 1997)

Where an election under s434(3A)(a) is being made the following panels should be completed:

If the company is making a joint election with another company under s434(3A)(a), please tick the box ☐

The tax reference number of the company which paid the distribution

The tax reference number of the company which received the distribution

The date of the distribution

The amount of the distribution covered by the election €

Click on the 'add election' button to add another election. You can add up to 10 Elections Add another Election

**Surcharges in respect of Accounting Periods ending in the 12 months preceding this Accounting Period**

Section 440 TCA 1997 €

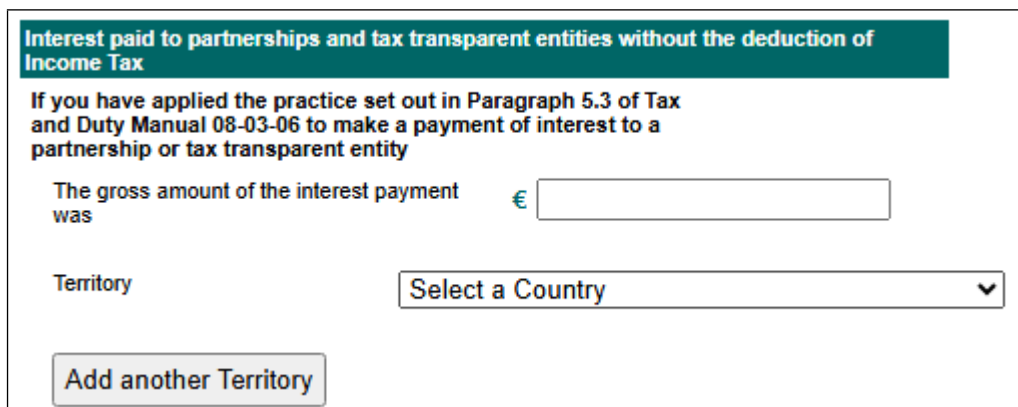
Section 441 TCA 1997 €

Figure 47: Surcharge screen with new question and removal of reference to making a distribution

## 10 Recovery of Income Tax

### 10.1 Interest paid to partnerships and tax transparent entities without the deduction of Income Tax

A new section has been added which deals with interest paid without the deduction of Income Tax. Details of paragraph 5.3 as referenced in this section can be found here: [08-03-06](#) . A filer will be asked to enter the gross amount of interest paid and also the territory to which the partnership or tax transparent entity belongs. One country must be chosen from the territory dropdown. There is no option for “None”. Up to 50 territories and corresponding payments can be entered.



The screenshot shows a form section with a dark green header containing the text "Interest paid to partnerships and tax transparent entities without the deduction of Income Tax". Below the header, there is a paragraph of text: "If you have applied the practice set out in Paragraph 5.3 of Tax and Duty Manual 08-03-06 to make a payment of interest to a partnership or tax transparent entity". This is followed by two input fields: "The gross amount of the interest payment was" with a Euro symbol (€) and a text box, and "Territory" with a dropdown menu labeled "Select a Country". At the bottom of the section is a button labeled "Add another Territory".

Figure 48: new section for Interest paid to partnerships and tax transparent entities without the deduction of Income Tax

## Appendix 1: Extract from Accounts

| 2024 CT1 Extracts from Accounts   | Change / validation / notes  |
|---|--|
| *Income   | No change  |
| *Sales / Receipts / Turnover  | No change  |
| *Receipts from Government Agencies - GMS, etc.  | No change  |
| *Other Income   | No change  |
| Trading Account Items   | No change  |
| * Purchases   | Field is mandatory   |
| *Gross Trading Profits  | No change  |
| Expenses and Deductions   | All fields in section are mandatory  |
| *Salaries / Wages   | Amended wording – question split   |
| *Staff costs  | Amended wording – question split   |
| *Directors' remuneration including fees, bonuses, etc   | Field is mandatory   |
| *Sub-Contractors <b>for the purposes of RCT</b>   | Amended wording – question split   |
| * <b>Sub-contractors other</b>  | Amended wording – question split   |
| *Rent paid  | New question   |
| *Consultancy, Professional fees   | Field is mandatory   |
| *Motor, Travel and Subsistence  | Field is mandatory   |
| *Repairs / Renewals   | Field is mandatory   |
| *Interest Payable   | Field is mandatory   |
| *Depreciation/ <b>Amortisation</b> , Goodwill/Capital write-off'  | Amended text   |
| *(a) Provisions including Bad Debts - positive  | No change  |
| *(b) Provisions including Bad Debts – negative  | Amended text   |
| Other Expenses – Negative/Credit Entries  | New question   |
| Other Expenses [Total]  | No change  |
| Total CRSS and BRSS payments received   | New question   |
| <b>Note (Expenses and deductions)</b><br><b>If you wish to comment on any one off or unusual expenses/deductions in this period use this 'additional notes' field</b> | New question   |
| Extracts from Adjusted Net Profit / Loss Computation  | No change  |
| Profit / Loss per Accounts  | No change  |
| *A value must be provided for either Profit or Loss on ordinary activities before taxation  | No change  |
| Profit on ordinary activities before taxation   | No change  |
| Loss on ordinary activities before taxation   | No change  |
| Adjustments made to Profit/Loss <b>before tax</b> per Accounts  | Amended text   |
| <b>There are no adjustments required to the profit / loss per accounts</b><br>Tickbox   | New question. Tickbox added, with validation on field. Either the tickbox is ticked, or all the fields in the section must be completed. |
| *Subscriptions and Donations  | All are mandatory if the tickbox (as per the row above) is NOT ticked.   |
| *Entertainment Expenses   | No change  |
| *Disallowable Legal and Professional Expenses   | No change  |

| <b>2024 CT1 Extracts from Accounts</b>  | <b>Change / validation / notes</b> |
|---|------------------------------------|
| *Section 130 Loan Interest  | No change                          |
| <b>Light, Heat and Phone</b>  | Deleted                            |
| *Depreciation/Amortisation, Goodwill/Capital write-off  | New question                       |
| *Net gain on sale of fixed / chargeable assets €  | No change                          |
| *Net loss on sale of fixed / chargeable assets  | No change                          |
| Deduction for stock relief under S 666  | New question                       |
| Deduction for increase in carbon tax under section 664A   | New question                       |
| *Other deductions   | New question                       |
| *Other addbacks   | New question                       |
| Balance Sheet and Capital and Reserve Items   | No change                          |
| Director's current and loan account   | No change                          |
| *(a) Amounts owed by directors (debit balance)  | Field is mandatory                 |
| *(b) Amounts owing to directors (credit balance)  | Field is mandatory                 |
| Stock, Work in Progress, Finished goods   | No change                          |
| Trade Debtors   | New question                       |
| <b>Other</b> Debtors and Prepayments  | Amended text                       |
| Cash on hand / Bank - Debit   | No change                          |
| Bank / Loans / Overdraft - Credit   | No change                          |
| Trade creditors   | New question                       |
| <b>Other</b> Creditors and Accruals   | Amended text                       |
| Client Account Balances - Debit   | No change                          |
| Client Account Balances - Credit  | No change                          |
| Tax Creditors   | No change                          |
| *A value must be provided for either Shareholder's Funds positive or Shareholder's Funds negative                                 | No change                          |
| (a) Shareholder's Funds - positive  | No change                          |
| (b) If negative, state amount here  | No change                          |
| Notes to the Accounts   | No change                          |
| Tick appropriate box(es) below and give additional information, if appropriate, in the space provided at <b>Additional Notes</b>  | No change                          |
| Modified Auditors Report  | No change                          |
| Emphasis of Matter  | No change                          |
| Qualified Opinion   | No change                          |
| Disclaimed Opinion  | No change                          |
| Adverse Opinion   | No change                          |
| Change of Accounting Policies   | No change                          |
| Depreciation of fixed assets  | No change                          |
| Stocks and work in progress   | No change                          |
| Property Development transactions   | No change                          |
| Other   | No change                          |
| Prior Year Adjustments  | No change                          |
| Indicate if there are prior year adjustments arising from changes in accounting policies or from correction of fundamental errors | No change                          |
| Change in nature of Company's / business' activities  | No change                          |
| Indicate if there was a change in the nature of the   | No change                          |

| <b>2024 CT1 Extracts from Accounts</b>   | <b>Change / validation / notes</b> |
|--|------------------------------------|
| Company's / business' activities during the accounting period  |                                    |
| Exceptional Items arising during the year  | No change                          |
| Indicate if exceptional items, as defined in the Financial Reporting Standards, occurred during the year | No change                          |
| Additional Notes   | No change                          |
| If you wish to expand on any item listed in Notes to the Accounts above, use this notes panel.           | No change                          |
| Please click on the Back to Extracts Accounts button to return to the Extracts From Accounts panel       | No change                          |

