

Insights

AUTUMN BUDGET 2024 – 10 KEY TAX POINTS FOR BUSINESS

Oct 31, 2024

SUMMARY

Yesterday, 30 October 2024, the Chancellor announced that the Autumn 2024 budget will raise taxes by £40bn, the biggest raise since 1993. While the Autumn budget arguably does not portray as pessimistic an outlook for individuals as was speculated, the rise in employers' national insurance contributions will, undoubtedly, not have been welcomed by business.

In this blog, we summarise 10 key tax announcements made at the budget that are relevant for business. It is not exhaustive, but provides a quick snapshot on a momentous budget.

| Тах | Pre-budget position | Post-budget position | Timescale |
|--------------------|--|---|--|
| Corporation tax | 25% rate payable for companies with profits over £250,000. | Headline rate is capped at 25%. | No change until the end of the current Parliament. |
| Capital allowances | Full expensing on qualifying investments. | Maintain full expensing on qualifying investments and potentially extend it to assets bought for leasing or hiring. | No change until the end of the current Parliament on existing full expensing. No timescale for possible extension to leasing or hiring. |

Summary of announcements

| Capital gains tax | 10% payable under the lower rate. | 18% payable under the lower rate. | Effective immediately. |
|---|---|--|---------------------------------|
| | 18% under the higher rate. | 24% under the higher rate. | |
| | | Anti-forestalling provisions to affect arrangements entered into in respect of unconditional but uncompleted contracts before 30 October 2024. | |
| | Reduced rate of 10% is payable on capital gains. | Initially, a 14% rate is payable on capital gains. | Effective from 6 April 2025. |
| Business Asset Disposal Relief (BADR) and Investors' Relief | | This shall rise to 18%. | Effective from 6 April 2026. |
| | Lifetime limit of £1m gains for BADR. | No change. | |
| | Lifetime limit of £10m gains for investors' relief. | Lifetime limit of £1m gains for investors' relief, matching the BADR limit. | Effective immediately. |
| | | For the BADR and investors' relief changes, anti-forestalling provisions apply. | |
| Employers' national insurance contributions | 13.8% rate payable on the income of each employee over £9,100. | 15% rate payable on the income of each employee over £5,000. | Effective 6 April 2025. |
| Stamp Duty Land Tax | 3% surcharge payable on additional dwellings. | 5% surcharge payable on additional dwellings. | All changes effective 31 |
| | 15% rate payable on the purchase by corporate bodies of dwellings costing over £500,000. | 17% rate payable on the purchase by corporate bodies of dwellings costing over £500,000. | October 2024. |
| Business rates - retail, hospitality and leisure | If eligible, 75% relief for 2024-2025 capped at | If eligible, 40% relief for 2025-2026 capped at | Effective from 1 April 2025. |

| sectors | £110,000. | £110,000. | |
|-----------------------------------|--|---|---|
| | | Permanently lower multipliers from 2026- 2027. | Effective from 1 April 2026. |
| | 28% rate payable for tax on carried interest that is taxed as capital. | 32% rate payable for tax on carried interest that is taxed as capital. | Effective from 6 April 2025. |
| Carried interest | | Taxed under income tax regime, with tax reduced by applying a 72.5% multiplier for qualifying carried interest. HMRC consulting on conditions for carried interest to be qualifying. | Effective from 6 April 2026. |
| | 35% rate payable on extraordinary profits of oil and gas companies operating in the UK or on the UK Continental Shelf. | 38% rate payable. | All changes effective from 1 November 2024. |
| Energy Profits Levy | 29% investment allowance and 80% decarbonisation investment allowance available. | 66% decarbonisation investment allowance is available (general investment allowance abolished). | |
| | Levy to expire on 31 December 2025. | Levy to expire on 31 March 2030. | |
| Inheritance tax for shares on AIM | 100% relief available as part of Business Property Relief. | 50% relief available as part of Business Property Relief. | Effective from 6 April 2026. |

* With thanks to Elizabeth Tomlinson for her assistance in writing this blog.

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