

Beta This part of GOV.UK is being rebuilt – [find out what beta means \(/help/beta\)](#)

HMRC internal manual

Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)
([/government/organisations/hm-revenue-customs](#))

Published 11 March 2016

Updated: 10 September 2025 - [See all updates](#)

[Back to contents](#) > [CIRD10000](#) > [CIRD12000](#)

CIRD12260 - Core computational rules: accounting: entries from which deductible debits derived: exclusion of expenditure on tangible assets CTA09/PART8/S727 (2), (3)

Sometimes capital expenditure on a tangible asset may arguably have been incurred for one of the purposes set out in [CIRD12250](#)

<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development->

[manual/cird12250](#)). For example, a company may incur expenditure acquiring motor vehicles used by staff of the department responsible for promoting the company's brand names. Such capital expenditure is specifically excluded from CTA09/PART8 by S727(2).

S727(3) provides that the term, 'capital expenditure' in S727 (2) is defined by reference to CAA01. In essence that is expenditure that is not a revenue deduction - see [CA11530](#)

(<https://www.gov.uk/hmrc-internal-manuals/capital-allowances-manual/ca11530>).

← **Previous page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12250)

→ **Next page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12270)



OGI

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated



© Crown copyright