

**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](#) > [CIRD13200](#)

## CIRD13240 - Core computational rules: realisation of assets: meaning of realisation proceeds

### CTA09/PART8/S739

#### Provision

The proceeds of realisation are, subject to tax adjustments, the amount recognised for accounting purposes as those proceeds, net of the incidental costs.

## Accounting treatment

That amount may well be set in a company's accounts against the book value of the asset realised to show on the face of those accounts only a profit or loss on disposal. But the proceeds for the purposes of Part 8 remain the figure before it is netted off in this way.

## Tax adjustments

The net proceeds may be subject to adjustment for tax (see [CIRD12030 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12030\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12030)), for example under the market value rule described in [CIRD45030 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird45030\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird45030) or the disincorporation relief provisions described in [CIRD43000 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird43000\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird43000)+ or where the consideration received is something other than money (see [CIRD48340 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48340\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48340)).

The incidental costs that are allowable in this way are not further defined but the various rules prohibiting or deferring deductions for certain types of expenditure described in [CIRD12580 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12580\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12580) apply. Expenditure on entertaining buyers of a company's intangible assets is perhaps the most likely type of disallowable expenditure to occur in practice.

## Other relevant guidance

See [CIRD13245 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13245\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13245) for how the net

proceeds of sales referable to an individual intangible asset are identified where a number of assets are realised together and for the link with the acquirer's tax computations.

See [CIRD12550 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12550\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12550) for the treatment of the incidental costs incurred in connection with the intended realisation of an asset that turns out to be abortive.

See [CIRD48340 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48340\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48340) where the consideration received includes something other than money.

← **Previous page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13230)

---

→ **Next page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13245)



**OGL**

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



© Crown copyright