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## HMRC internal manual

# Corporate Intangibles Research and Development Manual

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

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## CIRD20405 - Reinvestment relief: groups of companies: general

### Extension of reinvestment relief for groups of companies

The rules described in [CIRD20000](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20000>) onwards are extended for groups of companies as follows:

1. a taxable credit on the realisation of an asset arising to one group member (or a capital gain which is not from a 'chargeable intangible asset' - see [CIRD20035 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20035\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20035)) may qualify for reinvestment relief by virtue of expenditure on new assets by one or more other members of the same group (CIRD20410),
2. relief may also be available where the reinvestment takes the form of the acquisition of a controlling interest in a company already holding chargeable intangible assets ([CIRD20420 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20420\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20420)),
3. the exclusion of credits on deemed realisations from the relief is subject to an exception where the deemed realisation arises by virtue of the degrouping provisions ([CIRD20460 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20460\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20460)),
4. reinvestment relief is also available where an election is made to reallocate the taxable credit on degrouping to another group member ([CIRD20470 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20470\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20470)),
5. reinvestment relief is available in circumstances parallel to (c) and (d) above where, under the CG degrouping rules, a charge arises in respect of goodwill or an intangible asset which is outside CTA09/PART8 ([CIRD20480 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20480\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20480)).

A group of companies for this purpose follows the definition described in [CIRD40030 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird40030\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird40030) onwards (taken from the CG rules).

The extensions to reinvestment relief listed above all have their equivalents in the CG roll-over relief code with the exception of (b), the facility to look through the acquisition of shares in a company to its underlying assets.

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(</hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20410>)



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