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## HMRC internal manual

# Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)  
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[Back to contents](#) > [CIRD10000](#) > [CIRD20000](#)

## CIRD20050 - Reinvestment relief: general matters and conditions to be satisfied: by asset realised: assets within CG code CTA09/S898 & 900

Reinvestment relief is also available to defer a capital gain on a disposal of an intangible asset (including goodwill):

- which, but for failing the FA02 rule ([CIRD11500](#) <https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development>

[manual/cird11500](#)) onwards), would come within CTA09/PART8 (referred to as an 'existing asset' - see [CIRD11505 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11505\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11505)), the gain on the asset need not be one which qualifies for CG roll-over relief,

- on or after 1 April 2002.

For this purpose, the requirement that the asset realised must have been a chargeable intangible asset throughout the period it is held by a company or for a substantial part of that period ([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)) is replaced by the requirement that it must be a 'chargeable asset' throughout, or for a substantial part of, the same period.

An asset is a chargeable asset at any time if any gain on its disposal by the company holding it at that time would fall within the charge to CT and not be subject to exemption under any of the UK's double taxation agreements. This definition is similar to that described in CG45710.

The conditions in the reinvestment relief rules dealing with the asset realised are adapted where that asset is within the CG code as follows:

- references to the net proceeds of realisation for this purpose are to be read as references to the net proceeds of disposal, as explained in [CIRD20060 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20060\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20060),
- references to the cost of an asset are the subject of a special definition (see CIRD20060),
- contrary to the equivalent rule for the part realisation of chargeable intangible assets (see [CIRD20080 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20080\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20080)) part disposal of assets to a related party are not excluded from the scope of the relief.

## Withdrawal of CG roll-over relief

As the counterpart to the extension of reinvestment relief to CG described above, CG roll-over relief ceases to be available. See [CIRD20270 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20270\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20270).

### ← Previous page

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20040)

### → Next page

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird20060)



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