

Beta

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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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<u>updates</u>

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CIRD11720 - Intangible assets within CTA09/PART8: FA02 rule exceptions: royalties: general CTA09/PART8/S896 (1)

Timing rule

The royalties within CIRD11710

(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11710) to which CTA09/PART8 applies

are those, paid or received, which are not to be brought into account for corporation tax prior to 1 April 2002 under the rules outside CTA09/PART8.

If royalties of this kind are recognised for accounting purposes prior to 1 April 2002 they are brought into account under Part 8 on 1 April 2002. Otherwise they are brought into account under CTA09/PART8 on whatever date they are recognised for accounting purposes.

Other guidance relevant to royalties

For the more general computational rules that affect royalties see

- CIRD12530 (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12530) outgoings.
- CIRD13020 (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13020) incomings.

For the special computational rule for royalties paid late to related parties see <u>CIRD12660</u> (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12660).

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