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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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CIRD44200 - Intangible assets: Restrictions for goodwill and relevant assets acquired: how accounting and other debits are restricted under F2A15 CTA09/PART 8/S816A (3)

CTA09/S816A(3) restricts when relief for relevant assets is given by withdrawing debit relief under CTA09/PART 8/Chapter 3. For example no debit relief is allowed in relation to relevant assets in relation to:

- Expenditure written off as it is incurred (CTA09/S728)
- · Amortisation or impairment accounting debits (CTA09/S729)
- · Fixed rate debits (CTA09/S731)
- · Reversal of previous accounting gain (CTA09/S732)
- · Royalties in respect of a relevant asset.

Relief is instead given when the asset is realised, although further conditions apply on realisation, see CIRD44250

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