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HMRC internal manual

Corporate Intangibles Research and Development Manual

From: [HM Revenue & Customs](#)
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Published 11 March 2016

Updated: 10 September 2025 - [See all updates](#)

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CIRD44150 - Intangible assets: Restrictions for goodwill and relevant assets: circumstances when F2A15 rules will apply

CTA09/S816A (1)

Circumstances

The F2A15 rules apply when a company holds a relevant asset. The new rules apply to:

- assets acquired between 8 July 2015 and 31 March 2019, and
- assets created at any time and not previously recognised but only in relation to expenditure incurred between 8 July 2015 and 31 March 2019.

CTA09/S816A (2)

Relevant assets

The F2A15 rules apply to goodwill and to other types of intangible assets that are commonly associated with and were typically subsumed within goodwill under old UK GAAP (FRS10). This is to ensure that the new rules will apply despite the relaxed recognition criteria in new UK GAAP (FRS102 s18 and IAS38). Without this extended definition many types of intangible assets, not previously recognised as separate intangible assets under old UK GAAP, would remain eligible for unrestricted relief. This extended definition therefore prevents businesses from claiming relief for goodwill type assets closely associated with a business's customers. The definition of 'relevant asset' includes:

- goodwill,
- customer information of the business carried on by the transferor,
- customer relationships (contractual and non-contractual) of the business carried on by the transferor,
- unregistered trade mark or sign used in the business of the transferor, and
- a licence in respect of the above.

If during the course of your work a company identifies an asset closely associated with goodwill, but which is not included in the list

above, please notify one of the intangibles tax specialists in BAI.

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