

**Beta** This part of GOV.UK is being rebuilt – [find out what beta means \(/help/beta\)](#)

## HMRC internal manual

# Corporate Intangibles Research and Development Manual

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

Published 11 March 2016

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

[Back to contents](#) > [CIRD10000](#) > [CIRD13200](#)

## CIRD13270 - Core computational rules: realisation of assets: asset deemed to be realised while remaining in hands of company

### CTA09/PART8/S859

This paragraph identifies three circumstances where an asset ceases to be a ‘chargeable intangible asset’ (see [CIRD20035](#)  
<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development->

[manual/cird20035](#)) in the hands of a company while remaining in its possession. These are:

- a company holding a chargeable intangible asset ceases to be resident in the UK - [CIRD47030](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird47030>)
- a chargeable intangible asset held by a non-resident company ceases to be used in its UK trade carried on through a permanent establishment in the UK - [CIRD47030](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird47030>)
- a chargeable intangible asset held for the purpose of a non-mutual trade or business begins to be used for a mutual trade (see below)

### **Treatment of asset beginning to be used for mutual trade**

For the purposes of Part 8 the company is regarded as:

- realising the asset and reacquiring it immediately before it begins to be used for the mutual trade,
- doing so for its market value ([CIRD45030](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird45030>)) at the time.

See [CIRD12745](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12745>) for the treatment under CTA09/PART8 where an asset ceases to be used for a mutual trade.

← **Previous page**  
([/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird13260](#))



**OG**

All content is available under the Open Government Licence v3.0, except where otherwise stated



© Crown copyright