

**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](#) > [CIRD10100](#)

## CIRD10210 - Intangible assets: introduction: finance leasing

The corporate intangible assets regime also applies to companies that are finance lessors of intangible assets. The detailed legislation is in regulations, SI2002/1967 (see [CIRD27090](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird27090>)), made under powers set out in CTA09/PART8.

These rules are likely to be predominantly of interest to specialist leasing companies. They

incorporate protection against attempts to use sale and leaseback transactions to get around the rules keeping existing assets outside the regime.

There is also a rule that, if intangible fixed assets are leased to concerns that use them in a trade or business subject to income tax, then the assets remain outside the regime.

There is more guidance on the finance leasing provisions at [CIRD27000 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird27000\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird27000) onwards.

← **Previous page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird10200)

→ **Next page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird10220)



**OGL**

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated



© Crown copyright