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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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## CIRD25010 - Intangible assets excluded from CTA09/PART8: introduction

### CTA09/PART8/CHAPTER4

The third of the tests mentioned in [CIRD11100](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11100>) that an intangible asset needs to meet to satisfy the asset conditions is that it must not fall within any of a number of excluded categories.

These statutory exclusions can be divided into three types:

- assets which are largely outside FRS102 s18 (or IAS38/FRS105 s13/FRS10) as a matter of accounting principle ([CIRD25025](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25025) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25025>) onwards),
- assets excluded, some within FRS102 s18 (or IAS38/FRS105 s13/FRS10) some outside it, because special tax rules already apply to them - these exclusions are partial only ([CIRD25050](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25050) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25050>)),
- assets held by a company for uncommercial purposes or for the purposes of activities of the company outside the charge to CT ([CIRD25070](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25070) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird25070>)).

## Options

s801 provides that options or other rights (for example a futures contract) to acquire or dispose of an excluded asset are themselves excluded from CTA09/PART8. See [CIRD11175](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11175) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird11175>) for the treatment under CTA09/PART8 of options and other rights.

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