

**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](#) > [CIRD48000](#)

## CIRD48260 - Intangible assets: avoidance: measures in F2A05: change to rules: market value rules

### Market value rules

This page deals with the changes to the market value rules. Changes to the related party rules are dealt with at [CIRD48270 \(https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48270\)](https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48270).

Amendments to the market value rule on transfers between related parties were made in respect of transfers:

- at over or under value ([CIRD45033](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird45033>)) to ensure that the legislation for employment income and distributions could still act,
- where CG gift relief was claimed ([CIRD45035](#) (<https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird45035>)) so that the gain deferred reduced the expenditure recognised for the purposes of FA02/SCH29 and CTA09/PART8.

← **Previous page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48250)

→ **Next page**

(/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird48270)



**OGI**

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



© Crown copyright