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HMRC internal manual

Corporate Intangibles Research and Development Manual

From: **HM Revenue & Customs**

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CIRD13520 - Core computational rules: CT computation: intangible assets used for a trade or property business CTA09/PART8/S747-749

In the case of a trade, the deductible debits and taxable credits are simply regarded as receipts and expenses brought into the computation of the profit or loss from the trade for the accounting period in which they arise. The general CT rules then apply in the ordinary way to that profit or loss.

The same approach applies to the debits and credits arising from intangible assets used for the purpose of activities that borrow the computational rules for trades, namely:

- property businesses (including furnished lettings, and overseas property businesses)
- mines, transport undertakings etc within CTA09/S39(4) where the profits arising from land (which need not be trading profits on first principles) are taxed as trading income
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