



# Corporation Tax Act 2010

## 2010 CHAPTER 4

### [<sup>F1</sup>PART 8B

TRADING PROFITS TAXABLE AT THE NORTHERN IRELAND RATE

### CHAPTER 8

INTANGIBLE FIXED ASSETS

*Realisation credits and realisation debits*

#### [<sup>F1</sup>357OE] **The Northern Ireland element of a realisation credit or debit**

- (1) This section has effect for the purposes of this Chapter.
- (2) A realisation credit or realisation debit can have a “Northern Ireland element” only if—
  - (a) the intangible fixed asset to which it relates has been held by the company, in an accounting period in which it was a Northern Ireland company, wholly or partly for the purposes of a qualifying trade carried on by the company, except so far as the trade consists of an excluded activity, or
  - (b) in the case of a realisation credit, roll-over relief was previously given in respect of an asset which was so held.
- (3) The “Northern Ireland element” of a realisation credit or realisation debit is determined in accordance with section 357OF or 357OG.
- (4) “Roll-over relief” means relief under Chapter 7 of Part 8 of CTA 2009 (roll-over relief in case of realisation and reinvestment).]

---

**Changes to legislation:** There are currently no known outstanding effects for the Corporation Tax Act 2010, Section 357OE. (See end of Document for details)

---

.....

### Textual Amendments

- F1** Pt. 8B inserted (with effect in accordance with s. 5 of the amending Act) by [Corporation Tax \(Northern Ireland\) Act 2015 \(c. 21\), s. 1](#)

**Changes to legislation:**

There are currently no known outstanding effects for the Corporation Tax Act 2010, Section 357OE.