



Corporation Tax Act 2009

2009 CHAPTER 4

PART 8

INTANGIBLE FIXED ASSETS

CHAPTER 14

MISCELLANEOUS PROVISIONS

Values to be used in special cases

856 Assets acquired or realised together

- (1) Any reference in this Part to the acquisition or realisation of an asset includes a reference to the acquisition or realisation of that asset together with other assets.
- (2) For the purposes of this Part assets acquired or realised as a result of one bargain are treated as acquired or realised together even though—
 - (a) separate prices are, or purport to be, agreed for separate assets, or
 - (b) there are, or purport to be, separate acquisitions or realisations of separate assets.
- (3) If assets are acquired together, any values allocated to particular assets by the company in accordance with generally accepted accounting practice must be accepted for the purposes of this Part.
- (4) If no such values are so allocated, so much of the expenditure as on a just and reasonable apportionment is properly attributable to each asset is treated for the purposes of this Part as referable to that asset.
- (5) If assets are realised together, so much of the proceeds of realisation as on a just and reasonable apportionment is properly attributable to each asset is treated for the purposes of this Part as proceeds of the realisation of that asset.

Changes to legislation: Corporation Tax Act 2009, Cross Heading: Values to be used in special cases is up to date with all changes known to be in force on or before 22 June 2024. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations. (See end of Document for details) [View outstanding changes](#)

857 Deemed market value acquisition: adjustment where nil accounting value

- (1) This section applies if—
 - (a) a company is treated for the purposes of this Part as acquiring an asset at market value, but
 - (b) the accounting value of the asset transferred is nil in the hands of the transferee.
- (2) In such a case any reference in this Part to—
 - (a) the cost of the asset recognised for accounting purposes,
 - (b) the accounting value of the asset, or
 - (c) any loss recognised for accounting purposes in respect of capitalised expenditure on the asset,is a reference to the cost, value or loss that would have been recognised if the asset had been acquired at market value.
- (3) If the asset is revalued, the revaluation is ignored.
- (4) In this section “revaluation” has the same meaning as in section 723 (see subsection (5) of that section) and “revalued” must be read accordingly.

Changes to legislation:

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Changes and effects yet to be applied to the whole Act associated Parts and Chapters:

- Blanket amendment words substituted by [S.I. 2011/1043 art. 34](#)

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- s. 322(2A)(zb) inserted by [2016 c. 24 s. 73\(5\)](#)
- s. 1058B(5)(ea) inserted by [2023 c. 20 Sch. para. 57](#)
- s. 1094(2A)-(2C) inserted by [2012 c. 14 Sch. 3 para. 13\(3\)](#)
- s. 1106(4A)-(4C) inserted by [2012 c. 14 Sch. 3 para. 14\(3\)](#)