


# ***CR 2003/12W - Income tax: CSR Limited Demerger - CSR Employee Share Acquisition Plan***

 This cover sheet is provided for information only. It does not form part of *CR 2003/12W - Income tax: CSR Limited Demerger - CSR Employee Share Acquisition Plan*

 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2003*

## **Class Ruling**

### **Income tax: CSR Limited Demerger – CSR Employee Share Acquisition Plan**

#### ***Preamble***

*The number, subject heading, and the **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. CR 2001/1 explains **Class Rulings** and **Taxation Rulings** TR 92/1 and TR 97/16 together explain when a Ruling is a public ruling and how it is binding on the Commissioner.*

## **Withdrawal**

1. This Ruling is withdrawn on 30 June 2003 and ceases to have effect for income years commencing after that date. The Ruling continues to apply, in respect of the tax laws ruled upon to all persons within the specified class who enter into a specified arrangement during the term of the Ruling. Thus the Ruling continues to apply to those persons, even following its withdrawal, for arrangements entered into prior to the withdrawal of the Ruling. This is subject to there being no change in the arrangement or in the persons' involvement in the arrangement.

#### **Commissioner of Taxation**

26 February 2003

#### *Related Rulings/Determinations:*

TR 92/1; TR 92/20; TR 97/16;  
CR 2001/1

- qualifying shares
- return of capital
- roll-over

#### *Subject references:*

- beneficiary
- capital gains
- cessation time
- cost base adjustments
- demerger
- demerger dividend
- discount capital gain
- employee share acquisition scheme
- present entitlement

#### *Legislative references:*

- ITAA 1936 Part III
- ITAA 1936 13A
- ITAA 1936 44
- ITAA 1936 44(4)
- ITAA 1936 97
- ITAA 1936 97(1)(a)
- ITAA 1936 139C(1)
- ITAA 1936 139CA
- ITAA 1936 139CA(2)

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|-------------------------|---------------------------|
| - ITAA 1936 139CA(2)(a) | - ITAA 1997 104-75(6)     |
| - ITAA 1936 139CA(2)(b) | - ITAA 1997 104-135(1)    |
| - ITAA 1936 139CA(2)(d) | - ITAA 1997 109-5(1)      |
| - ITAA 1936 139CA(3)    | - ITAA 1997 112-20(1)     |
| - ITAA 1936 139CC(3)    | - ITAA 1997 115-A         |
| - ITAA 1936 139CC(4)    | - ITAA 1997 115-25        |
| - ITAA 1936 139CD       | - ITAA 1997 115-215       |
| - ITAA 1936 139E        | - ITAA 1997 115-215(3)(a) |
| - ITAA 1936 139FA       | - ITAA 1997 115-215(3)(b) |
| - ITAA 1936 139FB       | - ITAA 1997 115-215(6)    |
| - ITAA 1997 3-1         | - ITAA 1997 125           |
| - ITAA 1997 102-5(1)    | - ITAA 1997 125-55(1)     |
| - ITAA 1997 104-10(1)   | - ITAA 1997 130-D         |
| - ITAA 1997 104-10(2)   | - ITAA 1997 130-83(2)     |
| - ITAA 1997 104-10(4)   | - ITAA 1997 130-83(3)     |
| - ITAA 1997 104-75(1)   | - TAA 1953 Part IVAAA     |
| - ITAA 1997 104-75(5)   | - Copyright Act 1968      |
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## ATO References

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