

***CR 2005/102W - Income tax: scrip for scrip roll-over:
exchange of shares in The Hills Motorway Limited for
shares in Transurban Holdings Limited and
exchange of units in Hills Motorway Trust for units in
Transurban Holding Trust***

 This cover sheet is provided for information only. It does not form part of *CR 2005/102W - Income tax: scrip for scrip roll-over: exchange of shares in The Hills Motorway Limited for shares in Transurban Holdings Limited and exchange of units in Hills Motorway Trust for units in Transurban Holding Trust*

 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2005*



Class Ruling

Income tax: scrip for scrip roll-over:
exchange of shares in The Hills Motorway
Limited for shares in Transurban Holdings
Limited and exchange of units in Hills
Motorway Trust for units in Transurban
Holding Trust

Preamble

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Withdrawal**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVA 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 This Ruling is withdrawn immediately after 30 June 2005. The Ruling continues to apply, in respect of the tax laws ruled upon, to all persons within the specified class who enter into the arrangement during the term of the Ruling.

Commissioner of Taxation

16 November 2005

Previous draft:

Not previously issued as a draft

Related Rulings/Determinations:

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

Subject references:

- arrangement
- capital proceeds
- CGT event
- company
- cost base
- interests
- ordinary share

- original interest
- replacement interest
- resident
- roll-over
- scrip for scrip roll-over
- share
- shareholder
- stapled security
- takeover
- unit
- unit holder

Legislative references:

- ITAA 1936 6(1)
- ITAA 1997 104-10

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- | | |
|------------------------------|---------------------------|
| - ITAA 1997 104-10(3) | - ITAA 1997 124-781(3)(b) |
| - ITAA 1997 104-10(4) | - ITAA 1997 124-781(3)(c) |
| - ITAA 1997 116-20(1) | - ITAA 1997 124-781(4) |
| - ITAA 1997 Subdiv 124-M | - ITAA 1997 124-781(6) |
| - ITAA 1997 124-780 | - ITAA 1997 124-782 |
| - ITAA 1997 124-780(1)(a)(i) | - ITAA 1997 124-785(1) |
| - ITAA 1997 124-780(1)(b) | - ITAA 1997 124-785(2) |
| - ITAA 1997 124-780(1)(c) | - ITAA 1997 124-785(3) |
| - ITAA 1997 124-780(2)(a) | - ITAA 1997 124-785(4) |
| - ITAA 1997 124-780(2)(b) | - ITAA 1997 124-790(1) |
| - ITAA 1997 124-780(2)(c) | - ITAA 1997 124-790(2) |
| - ITAA 1997 124-780(3)(a) | - ITAA 1997 124-795(2)(a) |
| - ITAA 1997 124-780(3)(b) | - ITAA 1997 124-795(2)(b) |
| - ITAA 1997 124-780(3)(c) | - ITAA 1997 124-795(4) |
| - ITAA 1997 124-780(3)(d) | - ITAA 1997 124-810 |
| - ITAA 1997 124-780(4) | - ITAA 1997 995-1(1) |
| - ITAA 1997 124-780(4)(a) | - TAA 1953 Pt IVAAA |
| - ITAA 1997 124-780(4)(b) | - Copyright Act 1968 |
| - ITAA 1997 124-780(5) | - Corporations Act 2001 |
| - ITAA 1997 124-781(1)(a)(i) | - Corporations Act 2001 9 |
| - ITAA 1997 124-781(1)(b) | |
| - ITAA 1997 124-781(1)(c) | |
| - ITAA 1997 124-781(1)(d) | |
| - ITAA 1997 124-781(2)(a) | |
| - ITAA 1997 124-781(2)(b) | |
| - ITAA 1997 124-781(2)(c) | |
| - ITAA 1997 124-781(3)(a) | |
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Other references:

- Explanatory Memorandum to the New Business Tax System (Capital Gains Tax) Bill 1999

ATO references

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