



# ***CR 2005/81W - Income tax: exchange of shares in Sigma Company Limited for shares in Arrow Pharmaceuticals Limited***

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2006*



## Class Ruling

### Income tax: exchange of shares in Sigma Company Limited for shares in Arrow Pharmaceuticals Limited

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#### *Preamble*

*The number, subject heading, **What this Class Ruling is about** (including **Tax laws**, **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

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1. This Ruling is withdrawn and ceases to have effect after 30 June 2006.

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#### **Commissioner of Taxation** 12 October 2005

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#### *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 gains tax
- capital proceeds
- CGT event
- company
- cost base
- employee share scheme
- interests
- ordinary share
- original interest
- replacement interest
- resident
- roll-over
- roll-over relief
- scrip

- scrip for scrip
- share
- shareholder
- takeover

#### *Legislative references:*

- ITAA 1936 6(1)
- ITAA 1936 Pt III Div 13A
- ITAA 1936 139DQ
- ITAA 1936 139DR
- ITAA 1936 139E
- ITAA 1997 Subdiv 124-M
- ITAA 1997 124-780(1)(a)(i)
- ITAA 1997 124-780(1)(b)
- ITAA 1997 124-780(1)(c)
- ITAA 1997 124-780(2)(a)
- ITAA 1997 124-780(2)(b)
- ITAA 1997 124-780(2)(c)
- ITAA 1997 124-780(3)(a)
- ITAA 1997 124-780(3)(b)
- ITAA 1997 124-780(3)(c)
- ITAA 1997 124-780(3)(d)
- ITAA 1997 124-780(4)(a)

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|---------------------------|------------------------|
| - ITAA 1997 124-780(4)(b) | - ITAA 1997 124-810    |
| - ITAA 1997 124-780(5)    | - ITAA 1997 130-83(1A) |
| - ITAA 1997 124-785(2)    | - ITAA 1997 170-260    |
| - ITAA 1997 124-785(4)    | - Copyright Act 1968   |
| - ITAA 1997 124-795(2)(a) | - TAA 1953 Pt IVAAA    |
| - ITAA 1997 124-795(2)(b) |                        |
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## ATO references

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ATOlaw topic: Income Tax ~~ Capital Gains Tax ~~ roll-overs - scrip for scrip