


CR 2023/57 - Unity Bank Limited - Unity Capital Notes

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Status: **legally binding**

Class Ruling

Unity Bank Limited – Unity Capital Notes

📌 Relying on this Ruling

This publication (excluding appendix) is a public ruling for the purposes of the *Taxation Administration Act 1953*.

If this Ruling applies to you, and you correctly rely on it, we will apply the law to you in the way set out in this Ruling. That is, you will not pay any more tax or penalties or interest in respect of the matters covered by this Ruling.

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What this Ruling is about

1. This Ruling sets out the income tax consequences for specified entities who acquired Floating Rate Capital Notes issued by Unity Bank Limited (Unity) on 11 August 2023 and 16 August 2023 (Unity Capital Notes) under the Programme for the Issuance of Capital Notes described in the Information Memorandum dated 20 July 2023 and specified as Tranche No 1 of Series No 1 and Tranche No 1 and No 2 of Series No 2 in the Pricing Supplements dated 9 August 2023 and 15 August 2023.
2. Details of this scheme are set out in paragraphs 34 to 56 of this Ruling.
3. In this Ruling, unless otherwise defined, capitalised terms have the meaning specified in the Terms of the Capital Notes (Terms) which are contained in the Information Memorandum as supplemented, amended, modified, or replaced by the Pricing Supplements.
4. All legislative references in this Ruling are to the *Income Tax Assessment Act 1997*, unless otherwise indicated.

Who this Ruling applies to

5. This Ruling applies to you if you are an investor in Unity Capital Notes (referred to as an Investor) who:
 - acquired Unity Capital Notes by initial application for the issue of Unity Capital Notes under the Programme described in the Information Memorandum and supplemented by the Pricing Supplements

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- is a resident of Australia within the meaning of subsection 6(1) of the *Income Tax Assessment Act 1936* (ITAA 1936) during the period in which you hold your Unity Capital Notes
- holds your Unity Capital Notes on capital account, and
- is not subject to the taxation of financial arrangements rules in Division 230 in relation to gains and losses on your Unity Capital Notes.

Note: Division 230 will not apply to individuals unless they have made an election for it to apply.

What this Ruling does not consider

6. This Ruling does not deal with:

- the tax implications in relation to a non-resident who holds their Unity Capital Notes through a permanent establishment (as defined in subsection 6(1) of the ITAA 1936) in Australia
- the tax implications of Conversion or Write-off of Unity Capital Notes on the occurrence of a Non-Viability Event, or
- how the gross-up and tax offset rules in Division 207 apply to partnership or trustee investors (other than a partnership or trustee that is a corporate tax entity, or a trustee of a trust that is a complying superannuation entity), or to indirect distributions to partners in a partnership or beneficiaries or trustees of a trust.

When this Ruling applies

7. This Ruling applies from 1 July 2023 to 30 June 2031.

Ruling

Consequences of acquiring Unity Capital Notes

Acquisition date of Unity Capital Notes

8. You acquired your Unity Capital Notes when they were issued to you (the Issue Date) (table item 2 of section 109-10). Unity Capital Notes were issued on 11 August 2023 and 16 August 2023.

Cost base and reduced cost base of each Unity Capital Note

9. The first element of the cost base and reduced cost base of each Unity Capital Note is \$10,000, being the money you paid to acquire each of your Unity Capital Notes (subsections 110-25(2) and 110-55(2)).

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Consequences of holding Unity Capital Notes***Distributions on Unity Capital Notes and entitlement to tax offset for franking credits***

10. A Distribution on a Unity Capital Note is a non-share dividend as defined in section 974-120 and is included in your assessable income (subparagraph 44(1)(a)(ii) of the ITAA 1936).
11. In the income year in which a Distribution is made (section 207-20), you also:
- include the amount of the franking credit attached to the Distribution in your assessable income, and
 - are entitled to a tax offset equal to the franking credit.
12. To the extent that a Distribution (or a part of it) is either exempt income or non-assessable non-exempt income in your hands (and none of the exceptions in Subdivision 207-E apply), the amount of any franking credit on the Distribution that is exempt income or non-assessable non-exempt income is not included in your assessable income, and you are not entitled to a tax offset under Division 207 (Subdivision 207-D).
13. The franking credit tax offset that you are entitled to under Division 207 is subject to the refundable tax offset rules in Division 67, provided you are not excluded by the operation of section 67-25. Entities excluded by section 67-25 include corporate tax entities (such as companies, corporate limited partnerships, and public trading trusts), unless they satisfy the requisite conditions in subsections 67-25(1C) or (1D).

Determination under paragraph 177EA(5)(b) of the ITAA 1936

14. The Commissioner will not make a determination under paragraph 177EA(5)(b) of the ITAA 1936 to deny the whole, or any part, of the imputation benefits you receive in relation to a Distribution.

Determination under paragraph 204-30(3)(c)

15. The Commissioner will not make a determination under paragraph 204-30(3)(c) to deny the whole, or any part, of the imputation benefits you receive in relation to a Distribution.

Gross-up and tax offset cancelled in certain circumstances

16. Paragraph 207-145(1)(a) will not apply to cancel the effect of the gross-up and tax offset in respect of a franked Distribution if you are a qualified person in respect of that Distribution.
17. You will be a qualified person in relation to a Distribution if, during the primary qualification period, you held your Unity Capital Notes for a continuous period of at least 90 days during which you did not have 'materially diminished risks or loss of opportunities for gain' (as defined in former section 160APHM of the ITAA 1936) in respect of your Unity Capital Notes.
18. Paragraphs 207-145(1)(b) to (db) will not apply to cancel the effect of the gross-up and tax offset rules in respect of a franked Distribution.
19. In respect of paragraphs 207-145(1)(b) and (c), refer to paragraphs 14 and 15 of this Ruling.

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20. In respect of paragraph 207-145(1)(d), there is no evidence that the Distributions will be made as part of a dividend stripping operation.

21. In respect of paragraph 207-145(1)(da), the distribution washing provision does not apply (refer to subparagraph 56(t) of this Ruling).

22. In respect of paragraph 207-145(1)(db), the Unity Capital Notes are equity interests which form part of Unity's Additional Tier 1 Capital (refer to subsection 207-158(2) and subparagraph 56(d) of this Ruling).

Consequences of disposing of Unity Capital Notes

Unity Capital Notes are not traditional securities

23. A Unity Capital Note is not a 'traditional security' as defined in subsection 26BB(1) of the ITAA 1936.

24. Section 26BB of the ITAA 1936 will not apply to include any gain on the disposal or Redemption of Unity Capital Notes in your assessable income.

25. Section 70B of the ITAA 1936 will not apply to allow any loss on the disposal or Redemption of Unity Capital Notes as a deduction to you.

Unity Capital Notes are not qualifying securities

26. A Unity Capital Note is not a 'qualifying security' as defined in subsection 159GP(1) of the ITAA 1936. Therefore, Division 16E of the ITAA 1936 will not apply.

Optional Redemption of Unity Capital Notes

27. CGT event C2 happens when a Unity Capital Note is Redeemed for its Face Value (section 104-25).

28. The capital proceeds received by Investors on Redemption of the Unity Capital Notes will be replaced with the market value of the Unity Capital Notes on the Redemption Date, worked out as if the Redemption had not occurred and was never proposed to occur, if the capital proceeds are more or less than the market value of the Unity Capital Notes (subparagraph 116-30(2)(b)(ii)).

29. You will make a capital gain (or capital loss) on Redemption of your Unity Capital Notes if the capital proceeds you receive are greater than (or less than) the cost base of your Unity Capital Notes.

30. As you hold your Unity Capital Notes on capital account, no amount will be included in your assessable income on the Redemption under section 6-5.

31. In addition, you will not incur a deductible loss under section 8-1 as a consequence of the Redemption.

Other integrity provisions

Section 45A of the ITAA 1936

32. The Commissioner will not make a determination under subsection 45A(2) of the ITAA 1936 that section 45C of the ITAA 1936 applies to treat the whole, or a part, of the capital benefit provided to you on Redemption as an unfranked dividend.

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Section 45B of the ITAA 1936

33. The Commissioner will not make a determination under paragraph 45B(3)(b) of the ITAA 1936 that section 45C of the ITAA 1936 applies to treat the whole, or a part, of the capital benefit provided to you on Redemption as an unfranked dividend.

Scheme

34. The following description of the scheme is based on information provided by the applicant. If the scheme is not carried out as described, this Ruling cannot be relied upon.

Background

35. Unity is an unlisted public company incorporated in Australia. Unity operates as a mutual entity owned and controlled by its members.

36. Unity is an authorised deposit-taking institution for the purposes of the *Banking Act 1959* and is regulated by the Australian Prudential Regulation Authority (APRA).

37. Unity is an Australian-resident company as defined in subsection 995-1(1) and is not a resident of any other jurisdiction.

Main features of Unity Capital Notes

38. Unity Capital Notes are Australian dollar-denominated perpetual, non-cumulative, subordinated, unsecured debt obligations issued by Unity.

39. Unity Capital Notes were issued by Unity in Australia on the Issue Dates, being 11 August 2023 and 16 August 2023.

40. Unity Capital Notes are held either physically or in the Austraclear Limited (Austraclear) System. In relation to the Capital Notes that are held in the Austraclear system, Austraclear is the holder of the Unity Capital Notes as nominee for investors in Unity Capital Notes.

41. The Unity Capital Notes offer raised Additional Tier 1 Capital as part of Unity's capital management policy within the regulatory capital requirements prescribed by APRA. The proceeds from the issue of the Capital Notes will be used for the future growth of Unity in specific market segments.

42. The offer for issue was only open to eligible professional or sophisticated investors in accordance with Chapter 6D of the *Corporations Act 2001* and raised \$28.5 million from a mix of these types of investors.

Issue price

43. The Issue Price and Face Value of each Unity Capital Note is \$10,000. Unity Capital Notes were fully-paid on the Issue Date.

Distributions

44. Subject to the Terms, Unity will pay quarterly floating-rate cash Distributions on the Face Value of each Unity Capital Note on the relevant Payment Date.

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45. The Distribution payable is calculated as the Face Value of each Unity Capital Note, multiplied by a Distribution Rate (which is equal to the BBSW¹ plus the Margin, together adjusted by (1 – Tax Rate)), multiplied by the Day Count Fraction (which is equal to the actual number of days in the Calculation Period divided by 365). If any Distribution is not fully franked, then the Distribution will be adjusted to take into account the Franking Rate.

46. The payment of any Distribution is subject to Unity's absolute discretion and no Payment Condition existing in respect of the relevant Distribution Payment Date.

47. Payments of Distributions are non-cumulative. If all or any part of a Distribution is not paid, Unity has no liability to pay any unpaid amount of the Distribution and Investors have no claim or entitlement in respect of such non-payment. No interest accrues on any unpaid Distributions and Investors have no claim or entitlement in respect of interest on any unpaid Distributions.

48. Subject to certain exceptions, if a Distribution has not been paid in full on the Relevant Distribution Payment Date, Unity must not, without the approval of a Special Resolution, declare, determine to pay or pay a Dividend, or undertake any Buy-Back or Capital Reduction unless the Distribution is paid in full within 5 Business Days of the Relevant Distribution Payment Date.

Conversion or Write-off on Non-Viability Event

49. A Non-Viability Event means APRA has notified Unity that APRA considers that:

- the conversion into Unity MCIs or write-off of Relevant Securities in accordance with their terms or by operation of law is necessary because without the conversion or write-off, Unity would become non-viable, or
- without a public sector injection of capital, or equivalent support, Unity would become non-viable.

50. If a Non-Viability Trigger Event occurs, Unity must immediately either convert the Relevant Securities into Unity MCIs or Write-off all Relevant Securities, or where APRA is satisfied that conversion or write-off of a proportion of Relevant Securities will be sufficient to ensure that Unity will not become non-viable, that proportion of Relevant Securities.

51. Upon Conversion:

- you will be issued a number (the Conversion Number) of Unity MCIs for every Unity Capital Note held, and
- your rights (including to payment of Distributions) in relation to each Unity Capital Note that is being Converted will be immediately and irrevocably terminated for an amount equal to the Face Value of that Unity Capital Note and Unity will apply the Face Value of each Unity Capital Note by way of payment for subscription for the Conversion Number of MCIs.

52. Unity MCIs are 'mutual capital instruments' as defined in the *Corporations Act 2001* issued by Unity in accordance with the relevant provisions of its Constitution and the terms of issue set out in the Information Memorandum.

¹ In this Ruling, BBSW takes the definition provided in Clause 1.1 of the Terms (which is not replicated here).

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Optional Redemption

53. Unity may, with APRA's prior written approval, elect to Redeem for an amount equal to the Face Value (Redemption Price), all or some Unity Capital Notes of a Series on:

- a Redemption Date following the occurrence of a Tax Event or a Regulatory Event, or
- the Optional Redemption Date, being 11 August 2030.

54. Unity may only elect to Redeem Unity Capital Notes if APRA is satisfied that either:

- the Unity Capital Notes the subject of the Redemption are replaced concurrently or beforehand with a capital instrument of the same or better quality and the replacement of the instrument is done under conditions that are sustainable for Unity's income capacity, or
- the capital position of Unity will remain adequate after Unity elects to Redeem the Unity Capital Notes.

55. Unity Capital Notes will be Redeemed by payment on the Redemption Date of an amount equal to the Face Value to the Investor. On the Redemption Date, the only right the Investor will have in respect of Unity Capital Notes will be to obtain the Redemption Price payable in accordance with the Terms and any Distribution Unity has determined is payable on that date. Upon the Redemption Price being paid (or taken to be paid), all other rights conferred, or restrictions imposed, by Unity Capital Notes will no longer have effect.

Other matters

56. This Ruling is made on the basis that:

- (a) During the term of the scheme, Unity is a resident of Australia under the income tax laws of Australia and of no other jurisdiction.
- (b) The Investors who acquired Unity Capital Notes under the offer for issue are residents of Australia for tax purposes.
- (c) Unity Capital Notes are equity interests in Unity and non-share equity interests as defined in subsection 995-1(1).
- (d) Unity Capital Notes form part of Unity's Additional Tier 1 Capital for the purposes of the prudential standards determined by APRA and in force under section 11AF of the *Banking Act 1959*.
- (e) Distributions will be frankable distributions as defined in section 202-40.
- (f) Unity will frank Distributions at the same franking percentage as the benchmark franking percentage for the franking period in which the distributions are made.
- (g) Distributions on Unity Capital Notes are not sourced, directly or indirectly, from Unity's share capital account or its non-share capital account.
- (h) Distributions paid on Unity Capital Notes will not be debited against Unity's share capital account or non-share capital account.
- (i) Immediately before the payment of a Distribution, Unity expects that the amount of its available frankable profits will be such that no part of a Distribution is taken to be unfrankable under section 215-15.

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- (j) Unity expects that future tax payments will generate sufficient franking credits for Unity to fully frank frankable distributions on all equity interests.
- (k) Unity will not differentially frank Distributions to different Investors according to their tax status or on any other basis.
- (l) Unity, as a mutual entity, does not make distributions on its member shares.
- (m) Unity's share capital account did not become tainted under Division 197 as a result of issuing the Unity Capital Notes and will not become tainted as a result of issuing Unity MCIs on Conversion.
- (n) If Unity Capital Notes are Redeemed, the Redemption Price payable to you will be debited in full to Unity's non-share capital account.
- (o) Unity MCIs issued on Conversion will be equity interests in Unity as defined in Subdivision 974-C and constitute Tier 1 Capital.
- (p) Unity does not currently have on issue any other equity interests as defined in Subdivision 974-C that constitute Tier 1 Capital.
- (q) You will not take any 'positions' (as defined in former section 160APHJ of the ITAA 1936) at any time in relation to your Unity Capital Notes apart from holding your Unity Capital Notes.
- (r) You (or an associate) will not make, be under an obligation to make, or be likely to make, a 'related payment' (as defined under former section 160APHN of the ITAA 1936) in relation to a Distribution.
- (s) You will hold your Unity Capital Notes for a continuous period of at least 90 days (excluding the day of acquisition and disposal (if relevant)), during the 'primary qualification period' (as defined in former section 160APHD of the ITAA 1936) in relation to a Distribution.
- (t) You (or your connected entities) will not engage in distribution washing (as outlined in section 207-157) in relation to a Distribution (unless entitled to the exception under subsection 207-157(4)).
- (u) All parties to the transaction are dealing with each other on arm's length terms.

Commissioner of Taxation

11 October 2023

 Status: **not legally binding**

Appendix – Explanation

❶ *This Explanation is provided as information to help you understand how the Commissioner's view has been reached. It does not form part of the binding public ruling.*

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Determination under paragraph 177EA(5)(b) of the ITAA 1936

57. Section 177EA of the ITAA 1936 is a general anti-avoidance provision that applies where one of the purposes (other than an incidental purpose) of a particular scheme is to enable a taxpayer to obtain an imputation benefit.

58. The conditions in paragraphs 177EA(3)(a) to (d) of the ITAA 1936 will be satisfied in relation to the present scheme. Therefore, the relevant circumstances of the scheme must be considered to establish whether any person who entered into or carried out the scheme, or any part of the scheme, did so for a more than incidental purpose of enabling an Investor to obtain an imputation benefit (paragraph 177EA(3)(e) of the ITAA 1936).

59. The Commissioner considers that the relevant circumstances of the scheme do not, on balance, lead to a conclusion that the purpose of enabling Investors to obtain imputation benefits is more than incidental to Unity's primary purpose of raising Additional Tier 1 Capital for regulatory capital requirements and continuing to operate within capital ratios.

Determination under paragraph 204-30(3)(c)

60. Subsection 204-30(1) empowers the Commissioner to make a determination under paragraph 204-30(3)(c) if an entity streams distributions in a certain way.

61. Based on the scheme, there is no evidence of streaming. Distributions will be received by all Investors by reason of their proportionate holding of Unity Capital Notes and not by reference to their tax profiles or individual tax positions. There is nothing in the Terms that allows Unity to treat Investors differently in respect of their entitlement to a franked Distribution.

Status: **not legally binding**

Gross-up and tax offset denied in certain circumstances – qualified persons

62. If you are not a qualified person in relation to a Distribution, you:
- do not include the franking credit attached to the Distribution in your assessable income (paragraph 207-145(1)(e)), and
 - are not entitled to a tax offset equal to the amount of the franking credit attached to the Distribution (paragraph 207-145(1)(f)).
63. As this Ruling is made on the basis that you have not made a related payment in respect of a Distribution, the relevant qualification period is the 'primary qualification period' (as defined in former section 160APHD of the ITAA 1936). The primary qualification period begins on the day after you acquired your Unity Capital Notes and ends on the 90th day after the day Unity Capital Notes become ex-distribution.
64. You need to have held your Unity Capital Notes 'at risk' for a continuous period of 90 days (excluding the days of acquisition and disposal, if relevant) during the primary qualification period. Any days you had materially diminished risks of loss or opportunities for gain in respect of your holding are excluded from the calculation of the holding period, but those days are not taken to break the continuity of the period you held your Unity Capital Notes (former subsection 160APHO(3) of the ITAA 1936).
65. Under former subsection 160APHM(2) of the ITAA 1936, you are taken to have materially diminished the risks of loss and opportunities for gain on a particular day with respect to your Unity Capital Notes if your net position on that day does not retain 30% or more of the risks and opportunities associated with holding Unity Capital Notes.

Market value of Unity Capital Notes on Redemption

66. The capital proceeds received by Investors on Redemption will be replaced with the market value of the Unity Capital Notes on the date of Redemption, worked out as if the Redemption had not occurred and was never proposed to occur, if the capital proceeds are more or less than the market value (subparagraph 116-30(2)(b)(ii)).
67. The market value of the Unity Capital Notes which are Redeemed may be determined in accordance with the Practical Compliance Guideline PCG 2021/1 *Application of market value substitution rules when there is a buy-back or redemption of hybrid securities – methodologies for determining value for investors holding their securities on capital account*.

Section 45A of the ITAA 1936

68. Section 45A of the ITAA 1936 applies where a company streams capital benefits and the payment of dividends to shareholders who would derive a greater benefit from receiving the capital benefits (the advantaged shareholders), and it is reasonable to assume that other shareholders (the disadvantaged shareholders) have received, or will receive, dividends.
69. The Redemption of Unity Capital Notes will constitute the provision of a capital benefit to Investors (paragraph 45A(3)(b) of the ITAA 1936 as affected by subsection 45A(3A) of the ITAA 1936).

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70. However, the Redemption of Unity Capital Notes will not constitute the streaming of capital benefits because, under a Redemption, Unity will not selectively direct the flow of capital benefits to Investors who could most benefit from the receipt of capital. Accordingly, as this requirement does not apply to the Redemption of Unity Capital Notes, the Commissioner will not make a determination to treat the whole, or a part, of the capital benefit received by Investors as an unfranked dividend.

Section 45B of the ITAA 1936

71. Section 45B of the ITAA 1936 applies where certain capital benefits are provided to shareholders in substitution for dividends. Where the conditions are met, the Commissioner may make a determination under paragraph 45B(3)(b) of the ITAA 1936 that section 45C of the ITAA 1936 applies to the whole, or a part, of the capital benefit such that it will be treated as an unfranked dividend.

72. The Redemption of Unity Capital Notes will constitute a scheme under which Investors are provided with a capital benefit by Unity (paragraph 45B(5)(b) as affected by subsection 45B(7) of the ITAA 1936). As a result, paragraph 45B(2)(a) of the ITAA 1936 will be satisfied.

73. At least some Investors will obtain a tax benefit as defined in subsection 45B(9) of the ITAA 1936 as a result of a Redemption. Accordingly, paragraph 45B(2)(b) of the ITAA 1936 will be satisfied.

74. Therefore, whether section 45B of the ITAA 1936 will apply to a Redemption of Unity Capital Notes depends on whether paragraph 45B(2)(c) of the ITAA 1936 will be satisfied. This involves considering the relevant circumstances of the Redemption scheme including, but not limited to, those listed in subsection 45B(8) of the ITAA 1936, to establish whether one of the persons who will enter into or carry out the scheme will do so for a more than incidental purpose of enabling a relevant taxpayer (the Investor) to obtain a tax benefit.

75. Having regard to the relevant circumstances, it has not been concluded that the Redemption of Unity Capital Notes will be entered into for a more than incidental purpose of enabling Investors to obtain a tax benefit. Accordingly, paragraph 45B(2)(c) of the ITAA 1936 would not be satisfied and the Commissioner will not make a determination under paragraph 45B(3)(b) of the ITAA 1936 that section 45C of the ITAA 1936 applies to the whole, or a part, of the capital benefit provided to Investors on Redemption.

 Status: **not legally binding**

References

Legislative references:

- ITAA 1936 6(1)
- ITAA 1936 26BB
- ITAA 1936 26BB(1)
- ITAA 1936 44(1)(a)(ii)
- ITAA 1936 45A
- ITAA 1936 45A(2)
- ITAA 1936 45A(3)(b)
- ITAA 1936 45A(3A)
- ITAA 1936 45B
- ITAA 1936 45B(2)(a)
- ITAA 1936 45B(2)(b)
- ITAA 1936 45B(2)(c)
- ITAA 1936 45B(3)(b)
- ITAA 1936 45B(5)(b)
- ITAA 1936 45B(7)
- ITAA 1936 45B(8)
- ITAA 1936 45B(9)
- ITAA 1936 45C
- ITAA 1936 70B
- ITAA 1936 Div 16E
- ITAA 1936 159GP(1)
- ITAA 1936 former 160APHD
- ITAA 1936 former 160APHJ
- ITAA 1936 former 160APHM
- ITAA 1936 former 160APHM(2)
- ITAA 1936 former 160APHN
- ITAA 1936 former 160APHO(3)
- ITAA 1936 177EA
- ITAA 1936 177EA(3)(a)
- ITAA 1936 177EA(3)(b)
- ITAA 1936 177EA(3)(c)
- ITAA 1936 177EA(3)(d)
- ITAA 1936 177EA(3)(e)
- ITAA 1936 177EA(5)(b)
- ITAA 1997 6-5
- ITAA 1997 8-1
- ITAA 1997 Div 67
- ITAA 1997 67-25
- ITAA 1997 67-25(1C)
- ITAA 1997 67-25(1D)
- ITAA 1997 104-25
- ITAA 1997 109-10
- ITAA 1997 110-25(2)
- ITAA 1997 110-55(2)
- ITAA 1997 116-30(2)(b)(ii)
- ITAA 1997 Div 197
- ITAA 1997 202-40
- ITAA 1997 204-30(1)
- ITAA 1997 204-30(3)(c)
- ITAA 1997 Div 207
- ITAA 1997 Subdiv 207-D
- ITAA 1997 Subdiv 207-E
- ITAA 1997 207-20
- ITAA 1997 207-145(1)(a)
- ITAA 1997 207-145(1)(b)
- ITAA 1997 207-145(1)(c)
- ITAA 1997 207-145(1)(d)
- ITAA 1997 207-145(1)(da)
- ITAA 1997 207-145(1)(db)
- ITAA 1997 207-145(1)(e)
- ITAA 1997 207-145(1)(f)
- ITAA 1997 207-157
- ITAA 1997 207-157(4)
- ITAA 1997 207-158(2)
- ITAA 1997 215-15
- ITAA 1997 Div 230
- ITAA 1997 Subdiv 974-C
- ITAA 1997 974-120
- ITAA 1997 995-1(1)
- Banking Act 1959 11AF
- Corporations Act 2001 Ch 6D

Other references:

- PCG 2021/1

ATO references

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