



***CR 2003/95W - Income tax: capital gains: scrip for scrip roll over: exchange of shares in GPG (UK) Holdings plc (GPG Holdings) known formerly as Guinness Peat Group plc for shares in the Guinness Peat Group plc (GPG) known formerly as Brunel Holdings plc***

 This cover sheet is provided for information only. It does not form part of *CR 2003/95W - Income tax: capital gains: scrip for scrip roll over: exchange of shares in GPG (UK) Holdings plc (GPG Holdings) known formerly as Guinness Peat Group plc for shares in the Guinness Peat Group plc (GPG) known formerly as Brunel Holdings plc*

 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: capital gains: scrip for scrip roll over: exchange of shares in GPG (UK) Holdings plc (GPG Holdings) known formerly as Guinness Peat Group plc for shares in the Guinness Peat Group plc (GPG) known formerly as Brunel Holdings plc

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### *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

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1. This Ruling is withdrawn and ceases to have effect after 30 June 2003.

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### Commissioner of Taxation

29 October 2003

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#### *Previous Ruling:*

Not previously released in draft form

#### *Related Rulings/Determinations:*

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

#### *Subject references:*

- acquiring entity
- arrangement
- capital
- capital gain

- class of persons
- exchange
- fixed entitlement
- income
- original entity
- original interest
- replacement interest
- roll-over
- scrip
- scrip for scrip roll-over
- share
- shareholder

# CR 2003/95

- share company

*Legislative references:*

- |                                |                                |
|--------------------------------|--------------------------------|
| - ITAA 1936 6(1)               | - ITAA 1997 124-780(4)(b)      |
| - ITAA 1997 Subdivision 124-M  | - ITAA 1997 124-785(1)         |
| - ITAA 1997 124-780(1) (a)(i)  | - ITAA 1997 124-785(2)         |
| - ITAA 1997 124-780(1) (b)     | - ITAA 1997 124-785(4)         |
| - ITAA 1997 124-780(1) (c)     | - ITAA 1997 124-795(1)         |
| - ITAA 1997 124-780(2) (a)(ii) | - ITAA 1997 124-795(2)(a)      |
| - ITAA 1997 124-780(2) (b)     | - ITAA 1997 124-795(2)(b)      |
| - ITAA 1997 124-780(2) (c)     | - ITAA 1997 124-795(4)         |
| - ITAA 1997 124-780(3) (a)     | - ITAA 1997 124-810            |
| - ITAA 1997 124-780(3) (b)     | - ITAA 1997 170-260            |
| - ITAA 1997 124-780(3)(c)(ii)  | - ITAA 1997 995-1(1)           |
| - ITAA 1997 124-780(3) (d)     | - TAA 1953 Part IVAAA          |
| - ITAA 1997 124-780(4)(a)      | - Companies Act 1985 (UK) 425  |
|                                | - Copyright Act 1968           |
|                                | - Corporations Act 2001 619(3) |
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ATO references

NO: 2003/14409

ISSN: 1445 2014