



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

 This cover sheet is provided for information only. It does not form part of *CR 2005/81W - Income tax: exchange of shares in Sigma Company Limited for shares in Arrow Pharmaceuticals Limited*

 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

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

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 This Ruling is withdrawn and ceases to have effect after 30 June 2006.

Commissioner of Taxation

12 October 2005

Previous draft:

Not previously issued as a draft

- scrip for scrip
- share
- shareholder
- takeover

Related Rulings/Determinations:

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

Legislative references:

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

- 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)

CR 2005/81

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

ATO references

NO: 2005/14361

ISSN: 1445-2014

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