



# ***CR 2006/92W - Income tax: scrip for scrip rollover: acquisition of Brambles Industries Limited by Brambles 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 2007*

# Class Ruling

## Income tax: scrip for scrip rollover: acquisition of Brambles Industries Limited by Brambles Limited

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### **❶ This publication provides you with the following level of protection:**

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

A public ruling is an expression of the Commissioner's opinion about the way in which a relevant provision applies, or would apply, to entities generally or to a class of entities in relation to a particular scheme or a class of schemes.

If you rely on this ruling, we must apply the law to you in the way set out in the ruling (or in a way that is more favourable for you if we are satisfied that the ruling is incorrect and disadvantages you, and we are not prevented from doing so by a time limit imposed by the law). You will be protected from having to pay any underpaid tax, penalty or interest in respect of the matters covered by this ruling if it turns out that it does not correctly state how the relevant provision applies to you.

## Withdrawal

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1. This Ruling is withdrawn immediately after 30 June 2007. The Ruling continues to apply, in respect of the relevant provisions relied upon, to all persons within the specified class who enter into the arrangement during the term of the Ruling.

## References

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### *Previous draft:*

Not previously issued as a draft

- scrip for scrip rollover
- share
- shareholder

### *Subject references:*

- arrangement
- capital proceeds
- CGT event
- company
- cost base
- interests
- ordinary share
- original interest
- replacement interest
- resident
- rollover

### *Legislative references:*

- ITAA 1936 6(1)
- ITAA 1936 177E
- ITAA 1997 104-10
- ITAA 1997 104-10(1)
- ITAA 1997 104-10(2)
- ITAA 1997 104-10(3)
- ITAA 1997 104-10(3)(b)
- ITAA 1997 104-10(4)
- ITAA 1997 104-230
- ITAA 1997 104-230(9)(a)

- |                              |                            |
|------------------------------|----------------------------|
| - ITAA 1997 116-20           | - ITAA 1997 124-785(1)     |
| - ITAA 1997 116-20(1)        | - ITAA 1997 124-785(2)     |
| - ITAA 1997 116-20(1)(a)     | - ITAA 1997 124-785(4)     |
| - ITAA 1997 116-20(1)(b)     | - ITAA 1997 124-790        |
| - ITAA 1997 Subdiv 124-M     | - ITAA 1997 124-795(1)     |
| - ITAA 1997 124-780(1)(a)(i) | - ITAA 1997 124-795(2)     |
| - ITAA 1997 124-780(1)(b)    | - ITAA 1997 124-795(2)(a)  |
| - ITAA 1997 124-780(1)(c)    | - ITAA 1997 124-795(2)(b)  |
| - ITAA 1997 124-780(2)(a)    | - ITAA 1997 124-795(4)     |
| - ITAA 1997 124-780(2)(b)    | - ITAA 1997 124-800(1)     |
| - ITAA 1997 124-780(2)(c)    | - ITAA 1997 124-810        |
| - ITAA 1997 124-780(3)(a)    | - ITAA 1997 136-25         |
| - ITAA 1997 124-780(3)(b)    | - ITAA 1997 170-260        |
| - ITAA 1997 124-780(3)(c)    | - ITAA 1997 995-1          |
| - ITAA 1997 124-780(3)(d)    | - TAA 1953                 |
| - ITAA 1997 124-780(4)(a)    | - TAA 1953 Sch 1 357-75(1) |
| - ITAA 1997 124-780(4)(b)    | - Copyright Act 1968       |
| - ITAA 1997 124-780(5)       |                            |
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#### ATO references

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ATOlaw topic: Income Tax ~~ Capital Gains Tax ~~ CGT event A1 - disposal of a CGT asset  
Income Tax ~~ Capital Gains Tax ~~ CGT events K1 to K11 - other CGT events  
Income Tax ~~ Capital Gains Tax ~~ roll-overs - scrip for scrip