

PS LA 2010/4 (Withdrawn) - Division 7A: trust entitlements

! This cover sheet is provided for information only. It does not form part of *PS LA 2010/4 (Withdrawn) - Division 7A: trust entitlements*

! This Practice Statement is being reviewed as a result of a court/tribunal decision. Refer to Decision Impact Statement: Bendel and Commissioner of Taxation (Published 15 November 2023).

! This Practice Statement is withdrawn on and with effect from 1 July 2022 as the position stated in this Practice Statement is no longer current.

Taxation Determination TD 2022/11 *Income tax: Division 7A: when will an unpaid present entitlement or amount held on sub-trust become the provision of 'financial accommodation'?* was published on 13 July 2022. This Determination contains the ATO view (and compliance approach) on this issue that applies to trust entitlements created on or after 1 July 2022.

An entity may continue to rely on this Practice Statement in respect of trust entitlements conferred on or before 30 June 2022. This includes circumstances where Option 1 and Option 2 have been put in place after 30 June 2022 for such entitlements.

That is, the Commissioner will not devote compliance resources to sub-trust arrangements conducted in accordance with this Practice Statement in respect of trust entitlements arising on or before 30 June 2022, even though those sub-trust arrangements may commence after 30 June 2022.

! This document has changed over time. This version was published on *1 July 2022*