


***TD 93/214A1 - Addendum - Income tax: Offshore Banking Units (OBU) - must an OBU enter details of expenditure that it intends to claim as allowable offshore banking (OB) deductions or allowable non-OB deductions in its relevant books of account at the time of incurring that expenditure?***

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# Addendum

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## Taxation Determination

Income tax: Offshore Banking Units (OBU) – must an OBU enter details of expenditure that it intends to claim as allowable offshore banking (OB) deductions or allowable non-OB deductions in its relevant books of account at the time of incurring that expenditure?

This Addendum is a public ruling for the purposes of the *Taxation Administration Act 1953*. It amends Taxation Determination TD 93/214 to update the end date of the Offshore Banking Unit regime.

TD 93/214 is amended as follows:

**1. Paragraph 2**

After the word 'OBU's', insert new footnote 1:

<sup>1</sup> The OBU regime is closed to new entrants from 14 September 2021. The concessional tax treatment for existing OBUs in respect of offshore activities will be removed effective from the 2023-24 income year. Interest payments paid on or after 1 January 2024 on offshore borrowings by OBUs will no longer be exempt from withholding tax.

This Addendum applies from 13 September 2021.

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**Commissioner of Taxation**

13 October 2021

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ATO references

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