

International

About this section

Section C6 provides technical detail on the consolidation rules for:

- the treatment of foreign income tax offsets
- transferring and using excess foreign tax credits
- transferring attribution surpluses relating to controlled foreign companies, foreign investment funds and foreign life assurance policies
- the treatment of conduit foreign income
- transferring foreign dividend account balances, and
- inheriting irrevocable elections or choices in relation to interests in CFCs, FIFs or FLPs.

This section has an overall explanation of these rules and detailed worked examples showing the processes and calculations involved.

For a brief description of the above rules see Part B (→ 'Treatment of foreign income tax offsets, excess foreign tax credits, attribution surpluses, conduit foreign income and irrevocable elections', B2-5).

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