

CR 2021/53A1 - Addendum - ICSGlobal Limited - return of share capital and special dividend

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Addendum

Class Ruling

ICSGlobal Limited – return of share capital and special dividend

This Addendum is a public ruling for the purposes of the *Taxation Administration Act 1953*. It amends Class Ruling CR 2021/53 to clarify the assessability of the special dividend for non-residents.

CR 2021/53 is amended as follows:

1. Paragraph 9

Omit the paragraph; substitute:

If you are a non-resident, the special dividend is non-assessable non-exempt income and is not included in your assessable income as the special dividend was declared to be conduit foreign income (paragraph 802-15(1)(a)). You are also not liable to pay withholding tax in respect of the special dividend (paragraph 802-15(1)(b)).

2. Paragraph 10

Omit the paragraph.

3. Paragraph 64

After the paragraph text, insert table caption:

Table 1: Categories of CGT assets that are taxable Australian property

This Addendum applies from 4 August 2021.

Commissioner of Taxation
19 October 2022

ATO references

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