


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

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# Addendum

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## 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.

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**Commissioner of Taxation**  
19 October 2022

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ATO references

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