

**Notice of Rulings 31 January 2024**

The Commissioner of Taxation, Chris Jordan, gives notice by notifiable instrument under subsection 358-5(4) of Schedule 1 to the *Taxation Administration Act 1953* of the following public rulings, copies of which can be obtained from [ato.gov.au/law](http://ato.gov.au/law)

|  |  |  |
| --- | --- | --- |
| NOTICE OF RULINGS | | |
| Ruling number | Subject | Brief description |
| TR 2024/1 | Income tax: composite items – identifying the relevant depreciating asset for capital allowances | This Ruling addresses the issue of whether an asset that is made up of a number of parts or components (the composite item) is itself a depreciating asset, or whether one or more of its components are separate depreciating assets.  The Ruling applies to years of income commencing both before and after its date of issue. |
| CR 2024/4 | Allkem Limited – scrip for scrip roll‑over | This Ruling sets out the income tax consequences for the holders of ordinary shares in Allkem Limited who disposed of those shares to Arcadium Lithium plc on 4 January 2024.  The Ruling applies from 1 July 2023 to 30 June 2024. |
| CR 2024/5 | Shriro Holdings Limited – return of capital | This Ruling sets out the income tax consequences for shareholders of Shriro Holdings Limited who received a return of share capital on 4 January 2024.  The Ruling applies from 1 July 2023 to 30 June 2024. |
| CR 2024/6 | Healthia Limited – scheme of arrangement | This Ruling sets out the income tax consequences for Healthia Limited shareholders who exchanged their Healthia shares on 11 December 2023 for Class B shares in Harold Topco Ltd, by way of a scheme of arrangement.  The Ruling applies from 1 July 2023 to 30 June 2024. |