

**Notice of Rulings 17 July 2024**

The Commissioner of Taxation, Rob Heferen, 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)

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| NOTICE OF RULINGS | | |
| Ruling number | Subject | Brief description |
| TD 2024/5 | Income tax: how the non-arm’s length income and capital gains tax provisions interact to determine the amount of statutory income that is non-arm’s length income | This Determination outlines our views as to how the non-arm’s length income and capital gains tax provisions interact in determining the amount of statutory income that is non-arm’s length where a capital gain arises as a result of non-arm’s length dealings.  This Determination applies to years of income commencing both before and after its date of issue. |
| CR 2024/44 | Pharmx Technologies Limited – return of capital | This Ruling sets out the income tax consequences for shareholders of Pharmx Technologies Limited who received the return of share capital payment of 75 cents per ordinary share held on 4 December 2023.  This Ruling applies to shareholders specified in the Ruling from 1 July 2023 to 30 June 2024. |

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| NOTICE OF ERRATUM | | |
| Ruling number | Subject | Brief description |
| TR 2022/3 | Income tax: personal services income and personal services businesses | This Ruling amends Taxation Ruling TR 2022/3 to correct language.  This Erratum applies from 23 November 2022. |