



Notice of Rulings 27 November 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

| NOTICE OF RULINGS | | |
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| Ruling number | Subject | Brief description |
| CR 2024/73 | Aristocrat Leisure Limited – Non-Executive Director Rights Plan | <p>This Ruling sets out the income tax consequences for employees of Aristocrat Leisure Limited who participate in the Aristocrat Non-Executive Directors Rights Plan.</p> <p>This Ruling applies to entities specified in the Ruling that enter the scheme from 1 October 2024 to 30 September 2029.</p> |
| CR 2024/74 | Smartgroup Corporation Ltd – Smartgroup Logbook Solution for car logbook records and odometer records | <p>This Ruling sets out when the reports generated by the Smartgroup Logbook Solution can be utilised to reduce the operating costs in both a logbook year of tax and a non-logbook year of tax for the purpose of calculating the taxable value of a car fringe benefit using the operating cost method.</p> <p>This Ruling applies to employers specified in the Ruling from 1 April 2023 to 31 March 2028.</p> |
| CR 2024/75 | Southern Cross Payments Ltd – return of capital by in specie distribution of shares in ISX Financial EU Plc | <p>This Ruling sets out the income and capital gains tax consequences for ordinary shareholders of Southern Cross Payments Ltd who received a return of capital by way of an in specie distribution of shares in ISX Financial EU Plc on 18 October 2021.</p> <p>This Ruling applies from 1 July 2021 to 30 June 2022.</p> |
| TD 2024/9 | Income tax: factors taken into account applying paragraphs 99B(2)(a) and (b) of the <i>Income Tax Assessment Act 1936</i> | <p>This Determination sets out our view on the relevance of the following in applying the hypothetical resident taxpayer tests:</p> <ul style="list-style-type: none">• characteristics of the hypothetical taxpayer, other than residency• in determining whether an amount would be assessable, the circumstances that gave rise to the relevant amount, and• how the property paid or applied to the Australian beneficiary became a trust asset (that is, the source of the amount paid or applied). <p>This Determination applies to arrangements both before and after its date of issue.</p> |