



Notice of Rulings 13 July 2022

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

NOTICE OF RULINGS		
Ruling number	Subject	Brief description
CR 2022/62	Totium Pty Ltd – health services provided to employees via The Exec Check program	This Ruling sets out the fringe benefits tax consequences for employers providing their employees with access to Totium Pty Ltd's The Exec Check program. This Ruling applies from 1 April 2021 to 31 March 2025.
CR 2022/63	Crestone Holdings Limited – scheme of arrangement and dividends	This Ruling sets out the income tax consequences of the dividends paid by Crestone Holdings Limited on 2 May 2022 and the scheme of arrangement whereby LGT Holding (Australia) Pty Ltd acquired all of the shares in Crestone Holdings Limited on 12 May 2022. This Ruling applies from 1 July 2021 to 30 June 2027.
CR 2022/64	Western Areas Limited – employee share scheme – shares disposed of under scheme of arrangement	This Ruling sets out the income tax consequences for Western Areas Limited employees who participated in the Tax Exempt Share Plan to acquire ordinary shares in Western Areas Limited, which were subsequently disposed of on 20 June 2022. This Ruling applies from 1 July 2019 to 30 June 2022.
TD 2022/11	Income tax: Division 7A: when will an unpaid present entitlement or amount held on sub-trust become the provision of 'financial accommodation'?	This Determination describes when a private company provides financial accommodation within the meaning of section 109D of the <i>Income Tax Assessment Act 1936</i> where that company is made presently entitled to income of a trust and either that entitlement remains unpaid (an unpaid present entitlement) or the trustee sets aside an amount from the main trust and holds it on a new separate trust (sub-trust) for the private company beneficiary. This Determination applies to trust entitlements arising on or after 1 July 2022.

NOTICE OF ADDENDUM		
Ruling number	Subject	Brief description
CR 2022/60	BHP Group Limited – dividend by way of in specie distribution of Woodside Energy Group Ltd shares	This Ruling has been amended to update the ratio of BHP Group Limited shares. This Addendum applies from 6 July 2022.