

**Notice of Rulings 16 December 2020**

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/)

| NOTICE OF RULINGS | | |
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| Ruling number | Subject | Brief description |
| LCR 2020/3 | The superannuation fund for foreign residents withholding tax exemption and sovereign immunity | This Ruling provides the ATO’s view on key concepts relating to sovereign immunity and the ‘superannuation fund for foreign residents’ withholding tax exemption.  This Ruling is effective from 1 July 2019. |
| CR 2020/75 | Qantas Airways Limited – 2019/20 Qantas short term incentive plan | This Ruling sets out the income tax consequences for employees of Qantas Airways Limited (Qantas) and its subsidiaries who are granted a right to be allocated a Qantas share under the 2019/20 Qantas Short Term Incentive Plan.  This Ruling applies from 1 July 2019 to 30 June 2023. |
| CR 2020/76 | Qantas Airways Limited – 2020–22 Qantas long term incentive plan | This Ruling sets out the income tax consequences for employees of Qantas Airways Limited (Qantas) and its subsidiaries who are granted a right to be allocated a Qantas share under the 2020–22 Qantas Long Term Incentive Plan.  This Ruling applies from 1 July 2019 to 30 June 2023. |
| PR 2020/13 | Income tax: Challenger Guaranteed Annuity (Floating Rate Fixed Term) | This Ruling sets out the tax consequences for taxpayers who invest in Challenger Guaranteed Annuity (Floating Rate Fixed Term) issued by Challenger Life Company Limited.  This Ruling applies from 16 December 2020, to entities that enter into the scheme from 16 December 2020 to 30 June 2023. |