



Notice of Rulings 21 February 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](https://www.ato.gov.au/law)

| NOTICE OF RULINGS | | |
|-------------------|--|--|
| Ruling number | Subject | Brief description |
| TR 2024/2 | Income tax: when does a corporate limited partnership 'credit' an amount to a partner in that partnership? | <p>This Ruling sets out the Commissioner's view on when a corporate limited partnership 'credits' an amount to one of its partners within the meaning of section 94M of the <i>Income Tax Assessment Act 1936</i>.</p> <p>The Ruling applies to years of income commencing both before and after the date of issue.</p> |
| TR 2024/3 | Income tax: deductibility of self-education expenses incurred by an individual | <p>This Ruling sets out the principles on the deductibility of self-education expenses under section 8-1 of the <i>Income Tax Assessment Act 1997</i>.</p> <p>The Ruling applies to arrangements both before and after its date of issue.</p> |
| CR 2024/9 | InvoCare Limited – employee share scheme – shares disposed of under a scheme of arrangement | <p>This Ruling sets out the income tax consequences for employees of InvoCare Limited who participated in the Employee Share Purchase Plan to acquire ordinary shares in InvoCare Limited which were disposed of for cash consideration pursuant to a scheme of arrangement on 24 November 2023.</p> <p>The Ruling applies from 1 July 2023 to 30 June 2024.</p> |
| CR 2024/10 | InvoCare Limited – scheme of arrangement and special dividend | <p>This Ruling sets out the income tax consequences of the special dividend paid and the scheme of arrangement under which Etermal Aus BidCo Pty Ltd acquired all the issued capital of InvoCare Limited which was not already held by funds managed or advised by TPG Capital Asia.</p> <p>The Ruling applies from 1 July 2023 to 30 June 2024.</p> |
| CR 2024/11 | Incitec Pivot Limited – reduction of share capital | <p>This Ruling sets out the income tax consequences for holders of ordinary shares in Incitec Pivot Limited who received a reduction of share capital of \$0.1557 per share paid on 8 February 2024.</p> <p>The Ruling applies from 1 July 2023 to 30 June 2024.</p> |

| | | |
|------------|--|---|
| CR 2024/12 | A2B Australia Limited – special dividend | <p>This Ruling sets out the income tax consequences for holders of ordinary shares in A2B Australia Limited who received a special dividend of \$0.60 per share paid by A2B Australia Limited on 30 January 2024.</p> <p>The Ruling applies from 1 July 2023 to 30 June 2024.</p> |
| PR 2024/1 | FTC Automator platform – use by clients of KPMG and Geotab Australia to calculate fuel tax credits | <p>This Ruling sets out the fuel tax credit consequences for fuel tax credit clients of KPMG and Geotab Australia Pty Ltd or its affiliates in Australia that specifically use the FTC Automator platform.</p> <p>The Ruling applies to taxable fuel acquired on or after 1 July 2023 by the class of entities specified in the Ruling that enter into the scheme for the fuel tax credit results from the FTC Automator from 1 July 2023 until 31 December 2024.</p> |

| NOTICE OF ADDENDUM | | |
|--------------------|---|---|
| Ruling number | Subject | Brief description |
| TR 2005/13 | Income tax: tax-deductible gifts – what is a gift | <p>This Addendum amends Taxation Ruling TR 2005/13 to remove the reference to Subdivision 30-D of the <i>Income Tax Assessment Act 1997</i> as this subdivision was repealed by the <i>Tax Laws Amendment (2011 Measures No. 9) Act 2012</i>.</p> <p>The Addendum applies from 21 March 2012.</p> |