

# Where have we come from?

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## 2005 - 2006

- **Conduit Foreign Income (CFI) rules**
  - Exemption from dividend WHT for foreign sourced profits distributed by way of unfranked dividends to non-residents
    - No Australian tax if foreign shareholder had invested directly
- **Foreign Resident CGT reforms**
  - Narrowed range of assets held by non-residents subject to Australian CGT
  - “Taxable Australian Property” (**TAP**), includes:
    - Taxable Australian real property (**TARP**), including shares in “land rich” companies (Australian and foreign)
    - Assets used at any time in carrying on business in Australia through a permanent establishment

# Conduit Foreign Income Annual Report

**Camilla Rothe**



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