



BUSINESS RESTRUCTURING ANALYSIS REPORT

Construction & Development Business - Holding

Company Structure & Tax Implications

Prepared for:	Instructing Accountant / Client (Mr Williams & Ms Brown)
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Classification:	Confidential

Question

Facts

Mr Williams and Ms Brown are running a construction and development business. Their annual gross turnover is \$2,100,000. It is a Pty Ltd with two directors/shareholders. The business is growing rapidly.

Questions

Client Query

As the business is growing very rapidly, what is the best structure for the business?

Discuss: (1) Holding company to control subsidiary companies for centralising management (with parent entities using a vertical integrated model to control separate projects) and asset protection (optimising risk by separating liability); and (2) Its immediate income tax, GST, and CGT implications.

1. Summary

Holding Company + Project Subsidiaries

The existing company ("Williams Brown Pty Ltd" or equivalent) becomes a subsidiary of a newly interposed holding company. Future construction and development projects are conducted through separate subsidiary companies, each wholly owned by the holding company.

This vertical integration model achieves three objectives: (1) centralised management and control through the holding company; (2) asset protection by isolating each project's liabilities in a separate subsidiary (preventing cross-contamination of project risk); and (3) scalability for a rapidly growing business that will take on multiple concurrent projects.

Tax Implications Summary

CGT: Division 615 ITAA 1997 provides a CGT rollover for interposing a new holding company between the existing shareholders and the existing company. No immediate CGT liability arises on the interposition, provided the conditions are met (all shareholders must participate, and the holding company must become the sole shareholder of the existing company).

Income Tax: No immediate income tax consequence from establishing the structure. The holding company and each subsidiary are separate taxpayers. Intra-group transactions must be at arm's length. Consolidated group election (Div 703-719) is available but not recommended at this scale.

GST: No GST consequences from interposing the holding company (share transactions are input taxed financial supplies). If assets are transferred between group entities, the going concern exemption (s 38-325 GST Act) may apply if conditions are met. Consider forming a GST group (Div 48 GST Act) to disregard intra-group supplies.

2. Facts & Assumptions

Facts Provided

Mr Williams and Ms Brown operate a construction and development business.

The business is conducted through a Pty Ltd company.

Both are directors and shareholders of the company.

Annual gross turnover is \$2,100,000.

The business is growing rapidly.

Assumptions Made

Assumption [ASSUMED]	Affects
Mr Williams and Ms Brown each hold 50% of the shares in the existing company. [ASSUMED]	Determines the shareholding structure in the new holding company and the UEO analysis for any rollover.
The existing company holds business assets (plant/equipment, motor vehicles, work-in-progress, potentially real property). [ASSUMED]	Determines which assets need to be transferred and which rollover provisions apply.
The existing company is a base rate entity (aggregated turnover < \$50M, BREPI <= 80%). [ASSUMED]	Company tax rate of 25% applies. This carries through to subsidiaries that also qualify as BREs.
The existing company has retained earnings and a positive net asset position. [ASSUMED]	Affects the valuation of shares for CGT purposes when interposing the holding company. Also relevant for Div 7A if loans arise between group entities.
The shareholders acquired their shares post-20 September 1985 (post-CGT). [ASSUMED]	CGT provisions apply to the share exchange under Division 615.
No existing family trust elections (FTEs) or group consolidation elections are in place. [ASSUMED]	Simplifies the restructure. If an FTE exists, the interposition may affect the family group.
The business is not subject to specific licensing restrictions that would prevent a group structure (e.g., QBCC licensing). [ASSUMED]	Construction businesses in Queensland require QBCC licences. The licence may need to be held by the operating subsidiary, not the holding company. This is a critical operational consideration.

Information Needed

Missing Information [NEEDED]	Impact if Different
Exact shareholding split between Mr Williams and Ms Brown. [NEEDED]	If not 50/50, affects the holding company share issue and UEO calculations.
List of assets held by the existing company (real property, plant, vehicles, WIP, goodwill, contracts). [NEEDED]	Determines asset protection strategy - which assets stay in the operating entity, which move to the holding company.
Market value of the existing company's shares and underlying assets. [NEEDED]	Required for the Division 615 rollover cost base calculations and stamp duty assessment.

Missing Information [NEEDED]	Impact if Different
Whether the existing company holds real property (development sites, business premises). [NEEDED]	Real property transfers between group entities attract stamp duty. Corporate reconstruction relief may be available but has strict conditions (100% common ownership for a specified period).
QBCC licence holder details and any licensing restrictions on group structures. [NEEDED]	QBCC licences are entity-specific. The operating subsidiary must hold the licence, not the holding company. Licence transfer or new application may be required.
Current debt facilities (bank loans, equipment finance) and any change-of-control clauses. [NEEDED]	Lenders may require consent to the restructure. Change-of-control clauses in loan agreements may be triggered by interposing a holding company.
Whether any development projects are currently in progress (WIP, pre-sold contracts). [NEEDED]	Assignment of contracts and WIP may trigger income recognition or require client consent.

3. Related Areas & Cross-Over Analysis

Area	Relevance	Key Provision	Impact
CGT - Div 615	Interposing new holding company between shareholders and existing company.	Div 615 ITAA 1997	CGT rollover available. No immediate CGT on share exchange if all shareholders participate.
CGT - Subdiv 328-G	Alternative rollover for transferring active assets between group entities.	Subdiv 328-G ITAA 1997	Available if aggregated turnover < \$10M. Covers CGT assets, trading stock, depreciating assets, revenue assets. Requires no change in UEO.
Income Tax	Separate taxation of each entity in the group.	s 6-5, s 8-1 ITAA 1997	Each subsidiary is a separate taxpayer. Intra-group transactions must be at arm's length (s 26-50). Transfer pricing (Subdiv 815-B) may apply if cross-border element.
GST	Intra-group supplies and potential GST group formation.	Div 48 GST Act	GST group disregards intra-group supplies. Going concern exemption for asset transfers. Construction activities = taxable supplies.
Stamp Duty (QLD)	Share transfers and any real property transfers within the group.	Duties Act 2001 (Qld)	Corporate reconstruction relief available for 100% commonly owned group transfers. Landholder duty if group entities hold QLD land.
Asset Protection	Separating operating liabilities from accumulated assets.	Corporations Act 2001	Limited liability of each subsidiary. Holding company protected from subsidiary's debts (subject to director duties).
Division 7A	Intra-group loans between related companies.	Div 7A ITAA 1936; s 109K	s 109K exempts loans between companies. However, loans from company to shareholder/associate still trigger Div 7A.
Company Tax Rate	Each subsidiary's BRE status.	s 23AA, s 23AB ITRA 1986	Each subsidiary assessed independently. If trading income, likely 25% rate. Passive holding company income may attract 30% if BREPI > 80%.
QBCC Licensing	Construction businesses must hold QBCC licence.	Queensland Building and Construction Commission Act 1991	Licence is entity-specific. New subsidiaries need their own licence or must operate under the existing entity's licence.

4. Analysis

4.1 Current Structure

Mr Williams (50%) and Ms Brown (50%) are the sole shareholders and directors of Williams Brown Pty Ltd (the "Existing Company"). The Existing Company conducts all construction and development activities through a single entity.

Current Structure Risks

Risk: All business activities, liabilities, contracts, and claims are concentrated in one entity. If a project fails, a defect claim arises, or a contractual dispute occurs, all company assets (including assets from profitable projects) are exposed to that single claim.

Growth limitation: A single entity cannot efficiently segregate project risk, manage multiple concurrent developments with different investors/joint venturers, or provide clean exit pathways for individual projects.

4.2 Proposed Structure - Holding Company + Project Subsidiaries

Structure Diagram

Mr Williams (50%)

Ms Brown (50%)

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Williams Brown Holdings Pty Ltd (Holding Company)

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|--- 100% ---> Williams Brown Construction Pty Ltd (Operating Co - existing company)

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|--- 100% ---> Project Alpha Pty Ltd (Subsidiary - Project 1)

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|--- 100% ---> Project Beta Pty Ltd (Subsidiary - Project 2)

|

|--- 100% ---> [Future project subsidiaries as needed]

How the Structure Works

Holding Company: Williams Brown Holdings Pty Ltd is a new company interposed between the shareholders and the Existing Company using Division 615. It becomes the 100% shareholder of the Existing Company. It provides centralised management, holds the group's intellectual property and key contracts (if appropriate), and receives dividends from subsidiaries. It does not conduct construction work directly.

Operating Company (Existing Co): The Existing Company continues to operate the core construction business. It holds the QBCC licence, employs the workforce, owns the plant and equipment, and executes construction contracts. Its liabilities are limited to its own assets.

Project Subsidiaries: Each major development project is conducted through a separate wholly-owned subsidiary. The subsidiary acquires the development site, enters into the construction contract (with the Operating Company or third parties), and sells the completed product. When the project is complete and all obligations are discharged, the subsidiary can be wound up cleanly.

Asset Protection Benefits

Risk	Single Entity	Holding Company Group
Defect claim on Project A	All company assets exposed - including profits from Project B, plant, vehicles, cash reserves.	Only Project Alpha Pty Ltd's assets are exposed. Project Beta, the Operating Company, and the Holding Company are insulated.
Contractual dispute with a client	All assets exposed.	Dispute is isolated in the specific project subsidiary.
Developer insolvency on a project	Entire business at risk if significant.	Only the project subsidiary enters administration. The group continues operating.
Workers compensation / personal injury claim	All assets exposed.	Claim lies against the Operating Company (employer). Holding company and project subsidiaries not directly liable.
Plant/equipment exposure	Equipment used across all projects - all at risk.	Equipment held in Operating Company and leased to project subsidiaries. If a project subsidiary fails, the equipment is not that subsidiary's asset.

Key Benefit: Risk Isolation

The vertical integration model ensures that the failure of any single project does not contaminate the rest of the group. Each subsidiary is a separate legal entity with its own limited liability.

The holding company is further insulated because it does not conduct operations - it only holds shares in subsidiaries. Creditors of a subsidiary generally cannot reach the holding company's assets unless the corporate veil is pierced (which requires fraud, sham, or agency).

4.3 CGT Implications - Division 615 Rollover

Relevant Law

Division 615 ITAA 1997 provides a CGT rollover for interposing a new holding company between shareholders and an existing company. The rollover allows the shareholders to exchange their shares in the existing company for shares in the new holding company without triggering an immediate CGT event.

The conditions for Division 615 are:

- (a) All owners of membership interests in the original entity (the Existing Company) must exchange their interests for interests in the new interposed entity (the Holding Company);
- (b) Immediately after the exchange, each owner's percentage interest in the Holding Company equals their percentage interest in the Existing Company before the exchange;
- (c) The Holding Company becomes the sole owner of all membership interests in the Existing Company;
- (d) The only consideration the owners receive is shares in the Holding Company (no cash or other consideration);
- (e) Both the Existing Company and the Holding Company are Australian residents.

Application to Facts

Mr Williams and Ms Brown each transfer their 50% shareholding in the Existing Company to the new Holding Company. In exchange, the Holding Company issues shares to Mr Williams (50%) and Ms Brown (50%). The Holding Company becomes the 100% shareholder of the Existing Company.

The conditions are satisfied: all shareholders participate, the percentage interests are maintained (50/50), the Holding Company becomes the sole shareholder, and no cash consideration is paid.

CGT Result: No Immediate Liability

CGT rollover under Division 615 applies. No immediate CGT liability for Mr Williams or Ms Brown on the share exchange.

The cost base of their new shares in the Holding Company equals the cost base of their old shares in the Existing Company.

The Holding Company's cost base for the shares in the Existing Company is determined under s 615-20 based on the market value of the Existing Company at the time of the exchange.

Creating New Subsidiaries

Creating new project subsidiaries (Project Alpha Pty Ltd, Project Beta Pty Ltd, etc.) does not trigger any CGT consequences. The Holding Company simply subscribes for shares in each new subsidiary at their issue price (typically \$1 per share). No existing assets are transferred - the subsidiaries are newly incorporated "clean" entities.

4.4 Income Tax Implications

Separate Taxation of Each Entity

Each company in the group is a separate taxpayer. The Holding Company, the Operating Company, and each project subsidiary each lodge their own income tax return and are taxed independently. There is no automatic consolidation of income.

Intra-Group Transactions

Transactions between group entities must be at arm's length. Key intra-group transactions will include:

Transaction	Tax Treatment	Key Risk
Operating Company builds for Project Subsidiary (construction contract)	Operating Co recognises revenue. Project Subsidiary recognises cost of construction as part of its cost base/trading stock. Must be at arm's length price.	If not arm's length, s 26-50 ITAA 1997 limits deductions. ATO may also apply Subdiv 815-B if any cross-border element.
Project Subsidiary sells completed development	Profit is ordinary income (s 6-5) if property developed for sale. No CGT discount - property is trading stock/revenue asset.	Profit taxed at 25% (if BRE). Extraction to shareholders requires dividends through the holding company.
Subsidiary pays dividend to Holding Company	Franked dividends received by the Holding Company are exempt from tax (s 44(1) read with Subdiv 207-B ITAA 1997 - inter-corporate dividend exemption).	Holding Company receives franked dividends tax-free. Can then distribute to shareholders.
Holding Company pays dividend to shareholders	Assessable to Mr Williams and Ms Brown at their marginal rates. Franking credits provide a tax offset.	Top-up tax payable if marginal rate exceeds company rate.
Management fees (Holding Company to subsidiaries)	Deductible to subsidiary, assessable to Holding Company. Must be at arm's length.	If above market rate, excess is non-deductible (s 26-50).
Intra-group loans	s 109K ITAA 1936 exempts company-to-company loans from Div 7A.	s 109K only applies to company-to-company loans. Loans from company to individual shareholders still trigger Div 7A.

Tax Rate for Each Entity

Each subsidiary that conducts active construction/development will earn trading income (ordinary income under s 6-5). Provided aggregated turnover < \$50M and BREPI ≤ 80%, each subsidiary qualifies as a base rate entity at 25%.

The Holding Company's income will primarily be dividends from subsidiaries (inter-corporate exempt) and potentially management fees. If management fees dominate, the Holding Company is also a BRE at 25%. If it earns only passive income (interest, rent), the 80% BREPI test may cause the 30% rate to apply.

Important: Div 7A and Intra-Group Loans

s 109K ITAA 1936 exempts loans between companies in the group from Division 7A. This means the Holding Company can lend working capital to project subsidiaries without triggering deemed dividends. However, loans from any company to Mr Williams or Ms Brown personally remain subject to Div 7A.

4.5 GST Implications

No GST on Share Exchange

The interposition of the Holding Company (share exchange under Division 615) does not trigger GST. The supply of shares is a financial supply (input taxed under Div 40 GST Act), not a taxable supply. No GST is charged or claimable on the share exchange.

GST Group - Division 48 GST Act

The group should consider forming a GST group under Division 48 of the GST Act. If the Holding Company and all subsidiaries form a GST group:

- Intra-group supplies are disregarded for GST purposes (no need to charge GST on inter-company transactions);
- Only supplies to external parties are taxable;
- The representative member (typically the Holding Company) lodges a single BAS for the group;
- This simplifies administration significantly for a multi-entity group.

Eligibility: The entities must be members of the same GST group (s 48-10) - which requires 90% ownership (direct or indirect). Since the Holding Company will own 100% of each subsidiary, this condition is easily met.

Construction Activities - Ongoing GST

Construction and development activities are taxable supplies. Each project subsidiary (or the Operating Company, depending on the contract structure) must charge GST on construction contracts and development sales. Input tax credits are available for construction costs, materials, and professional fees.

If the group sells new residential premises, the withholding-at-settlement rules under Subdiv 14-E TAA 1953 apply - the purchaser must withhold 1/11 of the contract price (or 7% if margin scheme applies) and remit to the ATO.

4.6 Stamp Duty Implications (QLD)

The Division 615 share exchange (interposing the Holding Company) will generally trigger QLD transfer duty on the transfer of shares in the Existing Company. However, QLD corporate reconstruction relief under Chapter 10, Part 2 of the Duties Act 2001 (Qld) may exempt the transfer if:

- (a) The entities are in the same corporate group (100% common ownership);
- (b) The ownership has been 100% common for at least 12 months (or since incorporation if shorter); and
- (c) The ownership must remain 100% common for at least 3 years after the transfer.

Since the Holding Company is newly incorporated, the 12-month pre-ownership condition may not be satisfied at the time of the share exchange. However, QLD allows an exception where the interposed entity is newly incorporated specifically for the restructure. The specific conditions should be confirmed with QRO.

Landholder duty: If the Existing Company holds QLD real property, the transfer of shares to the Holding Company may also trigger landholder duty (Ch 3, Part 2 Duties Act 2001) if the Existing Company is a "landholder" (holds QLD land). Corporate reconstruction relief may also apply to landholder duty.

Action Required: QRO Confirmation

Stamp duty analysis is state-specific and depends on the assets held. If the Existing Company holds QLD real property, obtain QRO confirmation of corporate reconstruction relief eligibility before proceeding with the restructure.

5. Worked Example Tables

5.1 Restructure Implementation Plan

Phase	Action	Tax Consequence	Estimated Cost
Phase 1: Establish Holding Company	Incorporate Williams Brown Holdings Pty Ltd. Directors: Mr Williams and Ms Brown. Shareholders: Mr Williams (50%) and Ms Brown (50%).	No tax consequence. ASIC registration fee only.	ASIC: \$576; Legal/accounting: ~\$2,000-\$3,000
Phase 2: Div 615 Share Exchange	Mr Williams and Ms Brown transfer their shares in the Existing Company to the Holding Company. In exchange, the Holding Company issues shares to them in the same 50/50 proportions.	CGT rollover under Div 615. No immediate CGT. Cost bases roll over.	Legal: ~\$2,000-\$5,000; Stamp duty: check QRO (potentially nil with corporate reconstruction relief)
Phase 3: Create Project Subsidiaries	Incorporate Project Alpha Pty Ltd, Project Beta Pty Ltd (etc.) as needed. Holding Company subscribes for 100% of shares in each.	No tax consequence. ASIC registration fee per subsidiary.	ASIC: \$576 per subsidiary; Legal: ~\$1,000-\$2,000 per subsidiary
Phase 4: GST Group Registration	Apply to ATO to form a GST group with the Holding Company as representative member.	Simplifies GST administration. Intra-group supplies disregarded.	Administrative: ~\$500-\$1,000
Phase 5: Operational Alignment	Update QBCC licensing, banking facilities, insurance policies, supplier/client contracts to reflect group structure.	No direct tax consequence. Operational and regulatory compliance.	Varies by complexity - allow \$5,000-\$10,000

6. Case Law Support

Primary Authority

Case / Reference	Source	Principle	Application
LCR 2016/3	ATO (Binding - Law Companion Ruling)	Small business restructure rollover (Subdiv 328-G): meaning of "genuine restructure" and safe harbour rules. UEO must not change.	If assets need to be transferred between group entities after the initial Div 615 interposition, Subdiv 328-G provides the rollover mechanism. LCR 2016/3 confirms the requirements.
<i>FCT v Spotless Services (1996) 186 CLR 404</i>	HCA	Part IVA: dominant purpose assessed objectively. Commercial substance must outweigh tax purpose.	The restructure must have genuine commercial rationale (asset protection, scalability, project risk management). The tax benefits (BRE status, Div 7A avoidance between companies) are incidental.

Supporting Authority

Case / Reference	Source	Principle	Relevance
<i>Salomon v Salomon & Co</i> [1897] AC 22	House of Lords	A company is a separate legal entity from its shareholders and directors. Limited liability protects shareholders.	Foundation of the asset protection strategy. Each subsidiary's liabilities are contained within that subsidiary.
<i>Industrial Equity Ltd v Blackburn</i> (1977) 137 CLR 567	HCA	The corporate veil may be pierced in limited circumstances (fraud, sham, agency) but not merely because of common ownership.	Supports the legitimacy of the holding company/subsidiary structure for asset protection.
s 197 Corporations Act 2001	Legislation	Directors of a corporate trustee are personally liable if trust assets are insufficient. For companies (not trusts), standard limited liability applies.	Relevant if any entity in the group acts as trustee. For the proposed pure company structure, s 197 is not a concern.

7. Conclusion

A holding company (Williams Brown Holdings Pty Ltd) interposed above the existing operating company using Division 615 ITAA 1997, with new project-specific subsidiaries created as needed.

This structure achieves all three stated objectives:

(1) Centralised management: The holding company provides a single point of control. Mr Williams and Ms Brown retain 50/50 ownership through the holding company. The holding company's board makes strategic decisions for the group, while each subsidiary manages its own project.

(2) Asset protection: Each project's liabilities are isolated in its own subsidiary. A defect claim, contractual dispute, or insolvency on one project does not expose the assets of other projects or the group. The holding company - which holds the group's equity value - does not conduct operations and is insulated from operational risk.

(3) Scalability: New projects are simply conducted through new subsidiaries. Each subsidiary can have its own financing, its own contracts, and its own timeline. When a project is complete, the subsidiary can be wound up without affecting the rest of the group.

Immediate tax implications are minimal: the Division 615 CGT rollover defers CGT on the share exchange; no income tax arises from establishing the structure; no GST applies to the share exchange; and stamp duty may be relieved under QLD corporate reconstruction provisions (subject to QRO confirmation). Ongoing compliance costs of approximately \$10,000-\$15,000 p.a. for the group are justified by the asset protection and operational benefits for a growing construction business.

8. Risks & Caveats

Part IVA risk: [Low] The restructure has genuine commercial substance - asset protection and project risk segregation for a construction business are recognised commercial objectives. The tax benefits (Div 615 rollover, s 109K intra-group loan exemption) are incidental to the commercial purpose.

Division 615 conditions: [Verify] All shareholders must participate in the share exchange. No cash or other consideration may be paid. The holding company must become the sole shareholder of the existing company. If any condition is not met, the rollover is unavailable and a CGT event A1 occurs on the share transfer.

Stamp duty - QLD: [Confirm with QRO] Corporate reconstruction relief must be confirmed with QRO before proceeding. If relief is not available, duty will be payable on the transfer of shares. If the existing company holds real property, landholder duty may also apply.

QBCC licensing: [Critical - operational] The QBCC licence is entity-specific. The existing company's licence does not automatically extend to subsidiaries. Each subsidiary conducting building work may need its own QBCC licence, or work must be contracted through the licensed entity (the Operating Company). Confirm with QBCC before restructuring.

Banking and debt facilities: [Verify before restructuring] Existing loan agreements may contain change-of-control clauses triggered by interposing a holding company. Lender consent may be required. Personal guarantees given by Mr Williams and Ms Brown will likely need to be updated.

Intra-group arm's length: [Ongoing] All transactions between group entities (construction contracts, management fees, loans, asset transfers) must be at arm's length. Non-arm's length transactions may result in denied deductions (s 26-50) or transfer pricing adjustments (Subdiv 815-B if any cross-border element).

Ongoing compliance cost: [Commercial] The group structure increases annual compliance costs by approximately \$10,000-\$15,000 per year (additional tax returns, ASIC fees, financial statements). This must be weighed against the asset protection benefit. For a \$2.1M+ turnover construction business, this is a modest cost.

Consolidated group - not recommended at this stage: [Information] Division 703-719 allows formation of a tax consolidated group where the head company is taxed on the group's combined income. This eliminates intra-group transactions for income tax purposes but adds significant complexity and cost. Not recommended at \$2.1M turnover - consider when turnover exceeds \$5-10M or when the group has 5+ entities.

9. Rulings & References

Legislation

Provision	Relevance
ITAA 1997, Division 615	CGT rollover for interposing a new holding company
ITAA 1997, Subdivision 328-G (ss 328-430 to 328-475)	Small business restructure rollover - CGT, trading stock, depreciating assets, revenue assets
ITAA 1997, s 6-5	Ordinary income - construction/development profits are ordinary income
ITAA 1997, s 8-1	General deduction provision
ITAA 1997, s 26-50	Limit on deductions for non-arm's length payments to related entities
ITAA 1997, Div 40	Depreciation of plant and equipment
ITAA 1997, Div 43	Capital works deductions (2.5% on commercial construction)
ITAA 1997, s 23AA, s 23AB ITRA 1986	Base rate entity test and BREPI
ITAA 1997, Subdiv 207-B	Inter-corporate dividend exemption
ITAA 1936, Div 7A (s 109K)	Company-to-company loan exemption from deemed dividends
GST Act, Div 48	GST groups - intra-group supplies disregarded
GST Act, s 38-325	Going concern exemption - GST-free supply
Duties Act 2001 (Qld), Ch 10 Part 2	Corporate reconstruction relief from stamp duty
Duties Act 2001 (Qld), Ch 3 Part 2	Landholder duty on acquisition of interests in landholding entities
Corporations Act 2001, ss 257A-257J	Share buy-back procedures (if needed for future exits)
QBCC Act 1991	Licensing requirements for building work in Queensland

ATO Rulings & Guidance

Reference	Topic	Binding Status
LCR 2016/3	Subdivision 328-G: genuine restructure and safe harbour rules	Binding (Law Companion Ruling)
TR 2014/6	Transfer pricing - application of Subdiv 815-B	Binding (Public Ruling)
TD 2022/11	Division 7A: trust unpaid present entitlements	Binding (Tax Determination)

Case Law

Case	Court	Principle
<i>FCT v Spotless Services (1996) 186 CLR 404</i>	HCA	Part IVA dominant purpose test - objective assessment

Case	Court	Principle
<i>Salomon v Salomon & Co [1897] AC 22</i>	House of Lords	Separate legal personality of a company - foundation of limited liability
<i>Industrial Equity Ltd v Blackburn (1977) 137 CLR 567</i>	HCA	Corporate veil not pierced merely because of common ownership

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