

Tax Guide 2021–22

2021–22 Tax Return Information Statement Guide

Eligible Colonial First State Investments Limited (CFSIL) trusts have adopted the Attribution Managed Investment Trust (AMIT) regime and as a result these trusts are required to issue an Attribution Managed Investment Trust Member Annual statement (AMMA) to members.

You will see some tax labels and components that comply with the Australian Taxation Office (ATO)'s reporting requirements for AMITs.

This guide will help you to complete your 2021–22 tax return using your 2021–22 Tax Return Information Statement from CFSIL.

You will receive

A Tax Return Information Statement for each investment you hold in the products listed on this page.

If you have withdrawn from your investment (including to pay an adviser service fee) or switched investments during the year you may also receive a Capital Gains Tax Information Statement from CFSIL. All relevant information from these statements needs to be included in your 2021–22 income tax return.

You should use this guide if...

you have received income as shown on the Tax Return Information Statement provided by us for the financial year ended 30 June 2022 from the following CFSIL products:

- FirstChoice Investments
- FirstChoice Wholesale Investments
- Managed Investment Funds
- Wholesale Investments
- Wholesale Mezzanine Investments
- FirstRate Saver and FirstRate Term deposit products.

You may wish to give this guide to your accountant or tax agent. This guide is to be used for Australian resident individuals only.

Please note that the capital gains amount shown on the Tax Return Information Statement does not include any capital gains from sale of units in CFS Trusts. The capital gains amount disclosed on the Tax Return Information Statement is capital gains that form part of the trust distribution amount. For capital gains from the sale of units in CFS Trusts, please refer to the Capital Gains Tax Information statement.

**This guide contains general information and is not tax advice.
Please contact your tax agent or accountant about personal tax matters.**

For general enquiries about your CFSIL investments, please refer to 'Frequently asked questions' on page 8, or call Investor Services on 13 13 36, Monday to Friday, 8am to 7pm, Sydney time.

You can view this guide by clicking on 'Find a form' on our website at cfs.com.au and selecting the 'Tax Guides' tab.

This guide helps you in 3 ways

1 Declare income from your CFSIL investments in your personal tax return.

2 Understand the different tax components of your income with a 'Definitions' page (these are on page 6 of this guide).

3 Answer some 'Frequently asked questions', that might save you a phone call. See page 8 of this guide.

To complete your 2022 tax return, you will need...

- The ATO Individual tax return instructions 2022.
- The ATO Individual tax return instructions supplement 2022.
- The ATO Tax return for individuals 2022.
- The ATO Tax return for individuals (supplementary section) 2022.
- Your Tax Return Information Statement for the CFSIL products you hold that are listed on the front page of this guide. You will also need taxation information statements from any other income sources.
- Your Capital Gains Tax Information Statement for the CFSIL products from which you have withdrawn (including to pay an adviser service fee), or switched during the year and a copy of the CFSIL Capital Gains Tax Information Statement guide. This guide is not necessary if you have not withdrawn (including to pay an adviser service fee) or switched investments during the year.
- Your quarterly/half-yearly statements if you have paid an adviser service fee.

If you have capital gains from other sources, or capital losses, you may also need the *Personal investors guide to capital gains tax 2022*, available from the ATO.

Please read all the instructions in this guide before you complete the *Tax return for individuals (supplementary section) 2022*.

General points when using this guide

- Even if you have reinvested your distributions they still need to be included in your tax return.
- If you have other CFSIL investment products and/or income from other sources you need to include all of these amounts in your 2021–22 income tax return.
- If you have paid an adviser service fee you may be able to claim a tax deduction for this.
- The information in this guide is for use by Australian resident individuals in the completion of the 2021–22 tax return.
- ATO tax return pre-fill for some items will be available from late July. Investors should always check the pre-fill amounts against the Tax Return Information Statement and if any discrepancies exist investors should use the Tax Return Information Statement amounts provided to complete their income tax return.

You will need to refer to the Tax return for individuals and the supplementary section 2022 and your Tax Return Information Statement to complete the following steps.

Part A Tax Return Information Statement

Refer to Part A of your CFSIL Tax Return Information Statement. Then follow the headings step-by-step.

Interest income (10L)

Interest income disclosed at this item is received from FirstRate Saver and FirstRate term deposits. The interest income, as shown on Part A, label 10L is to be entered into the Individual Tax Return form, item 10L along with any other interest income received from other investments.

TFN amounts withheld (Interest) (10M)

If you have not supplied your tax file number (TFN) to us in relation to your investments in FirstRate Saver or FirstRate term deposit, TFN tax has been withheld. This is shown under Part A, label 10M. This amount is to be entered into the Individual Tax Return form, item 10M along with any other TFN withholding amount from other investments.

Non-primary production income (13U)

If you have received Trust non-primary production income from your investments in CFSIL managed funds in your Tax Return Information Statement; the Non-primary production income item will have an amount next to it and a Tax Return Label (13U) on your Statement.

Enter this amount (plus any other amounts of non-primary production income you have from other trusts) at Question **13 U** of your *Tax return for individuals (supplementary section) 2022*.

Franked distributions from trusts (13C)

Refer to your Tax Return Information Statement; Franked distributions from Trusts, which may have an amount to the right of it and a Tax Return Label (13C) on your Statement.

Enter this amount (plus any franked distributions you received from other trusts) at Question **13 C** of your *Tax return for individuals (supplementary section) 2022*.

Share of franking credits – franked dividends (13Q)

Refer to your Tax Return Information Statement; **Share of franking credits – franked dividends** (also referred to as imputation credits) which may have an amount to the right of it and a Tax Return Label (13Q) on your Statement.

Enter this amount (plus any franking credits you received from other trust or partnership distributions) at Question **13 Q** of your *Tax return for individuals (supplementary section) 2022*.

You should seek professional advice if you have disposed of investments shortly after receiving a distribution with franking credits.

TFN amounts withheld (Trust Distribution) (13R)

Refer to your Tax Return Information Statement; TFN amounts withheld (Trust Distribution), Tax Return Label (13R) may have an amount to the right of it.

Enter this amount (plus any TFN amounts withheld from other trust distributions) at Question **13 R** of your *Tax return for individuals (supplementary section) 2022*.

The image shows two screenshots of Australian tax forms. The left screenshot is the '2022 Tax Return Information Statement' for FirstChoice Investments, detailing various income items and their corresponding tax return labels. The right screenshot is the 'Tax return for individuals 2022' form, showing the 'Individual information' section with fields for personal details and tax-related information.

Total current year capital gains (18H)/ Net Capital Gain (18A)

If there is an amount shown in Total current year capital gains (18A), print X in the YES box **G** at Question **18** of your Tax return for individuals (supplementary section) 2022 then work out which circumstance applies to you from the following options:

Option 1

Capital gains from CFSIL distribution only and no capital gains or losses from other sources (including sale of CFS Managed Funds).

Follow the steps for **Option 1**.

Option 2

Capital gains from CFSIL and other sources and no capital losses.

Follow the steps for **Option 2**.

Option 3

Capital gains from CFSIL and other sources and capital losses.

Follow the steps for **Option 3**.

Option 1

Question **18**

If you have an amount to the right of **Total current year capital gains** on your *Tax Return Information Statement*, enter this amount at **18 H** of your *Tax return for individuals (supplementary section) 2022*.

Take the amount to the right of **Net capital gain** on your Tax Return Information Statement and enter it in at **18 A**.

Normally the difference between **Total current year gains** and **Net capital gains** is the CGT discount percentage applied. For example a 50% discount is applied to gross capital gains held for more than 12 months for individual investors.

As you have no other capital gains or losses from other sources (including capital gains or losses from sale of CFS Managed Funds) continue onto the next item populated on your Tax Return Information Statement.

Option 2

For capital gains from other sources, you may need to use the *Personal investors guide to capital gains tax 2022*, which is available from the ATO. The guide provides step-by-step instructions to calculating the amounts needed to complete your tax return.

Question **18**

For gains from other sources (including capital gains from sale of units in your CFS Managed Funds) you will need to separately calculate the **Capital gains – discount method (gross-up amount)**, and the **Capital gains – other than discount method amount** (calculated using the ATO guide). If you have an amount to the right of **Total current year capital gains** on your statement, add this amount to the total of capital gains received from other sources (calculated using the ATO guide). The sum of these amounts should be entered at **18 H** of your Tax return for individuals (supplementary section) 2022.

Take the amount to the right of Net capital gain on your statement and add this amount to your net capital gain from other sources (after applying the relevant discount to discounted capital gains from other sources calculated using the ATO guide). If you are completing a return for a company, trust, superannuation fund or partnership, you will need to ensure that the amounts from other sources are calculated on the appropriate basis. The sum of these amounts should be entered at **18 A**.

Then go to the next item populated on your Tax Return Information Statement.

Option 3

If you have capital gains from other sources and capital losses, you will need to use the Personal investors guide to capital gains tax 2022, which is available from the ATO. The guide provides step-by-step instructions to calculating the amounts needed to complete your tax return.

For gains from other sources (including capital gains from sale of units in your CFS managed funds) you will need to separately calculate the capital gains – discount method (gross-up amount), and the capital gains – other than discount method amount. These amounts need to be added to the amounts distributed from CFSIL as shown under the heading Capital gains tax information – additional information in **Part B** of your Tax Return Information Statement.

Add the figure shown at Total current year capital gains to any other capital gains you have, including capital gains from sale of your units in CFSIL Trusts, and enter the total at Question **18 H** of your *Tax return for individuals (supplementary section) 2022*.

If you have any capital losses for the 2021–22 tax year (including capital losses from sale of the CFS managed funds) or prior year capital losses brought forward (these should be shown at box **V** at Question **18** of your 2020–21 tax return supplement), you must nominate the capital gain against which these losses are to be applied. Capital losses relating to the 2021–22 year should be applied against capital gains relating to the 2021–22 year, before offsetting capital losses brought forward from prior years. Typically capital losses would be applied against **Capital gains – other** first and then to discounted capital gains. The way you apply your capital losses will place you in one of three situations:

Situation A – net capital loss

Where the total of the 2021–22 financial year capital losses and any **prior year's** capital losses exceed the **Total current year capital gains** from all sources (that you have included at box **H** at Question **18** of your *Tax return for individuals (supplementary section) 2022*, the excess should be entered into box **V** at Question **18**. No amount should be entered in box **A** of your *Tax return for individuals (supplementary section) 2022*.

Situation B

Where the total of the 2021–22 financial year capital losses and any prior year's capital losses fully offset **Capital gains – other than discount method** amount (that you have included in the **Total current year capital gains** in box **H** at Question **18** on your tax return), then the Capital gains – discount method (gross up-amount) should be reduced by any remaining capital loss.

The end figure should then be divided by two and this amount entered into box **A** of Question **18** of your *Tax return for individuals (supplementary section) 2022*. (If the investment is made by a company no reduction for discounting is made; if a superannuation fund calculation, then multiply by $\frac{2}{3}$).

Situation C

Where the total of the 2021–22 financial year capital losses and any prior year's capital losses do not exceed the **Capital gains – other than discount method** amount then deduct the total of the capital losses from the amount shown in **Part A** of your Tax Return Information Statement opposite Net capital gain (**18 A**). The amount reduced by the capital losses should be entered at Question **18 A** of your *Tax return for individuals (supplementary section) 2022*.

Please note: If you have capital gains from other sources, including gains made on sale of your units, you will need to include these gains in the situations A, B and C.

Controlled Foreign Company (CFC) income (19K)

CFS managed funds may invest in companies or other managed funds that require controlled foreign company income to be reported. If you have an amount stated on your Tax Return Information Statement, label **19 K**, please enter this amount at label **19 K** of your income tax return and print X in the YES box at item 19 label I.

Assessable foreign source income (20E)

If you have an amount to the right of **Assessable foreign source income** on your Tax Return Information Statement (and you do not have any other foreign source income from another source, including foreign employment or foreign pension/annuities), then enter the amount to the right of **Assessable foreign source income** at Question **20 E** of the *Tax return for individuals (supplementary section) 2022*.

If you do have foreign income from foreign employment and/or foreign pensions and annuities, you will need to refer to the instructions for Question **20** of the *Individual tax return instructions supplement 2022*.

You should seek professional advice if you have deductions relating to foreign income.

Other net foreign source income (20M)

If you have an amount to the right of **Other net foreign source income** on your Tax Return Information Statement (and you do not have any other foreign source income from another source) then include the total to the right of **Other net foreign source income** at Question **20 M** of the *Tax return for individuals (supplementary section) 2022*.

If you have other foreign income you will have to follow the instructions for Question **20** of the *Tax return for individuals (supplementary section) 2022*.

You should seek professional advice if you have deductions relating to foreign income.

Note: If you have **Other net foreign source income** or **Assessable foreign source income** from other sources (i.e. other managed fund distributions) you will need to combine these amounts before completing your tax return.

Australian franking credits from New Zealand franking company (20F)

CFSIL Funds may have received dividends from New Zealand companies that have Australian franking credits attached. If your Tax Return Information Statement has an amount for label **20 F** enter this amount (plus any Australian franking credits from a New Zealand franking company from other sources) in label **20 F** of the *Tax return for individuals (supplementary section) 2022*.

Foreign income tax offset (20O)

If you have an amount next to foreign income tax offsets on your Tax Return Information Statement, include that amount (plus any Foreign income tax paid from other sources you are entitled to claim) in your *Tax return for individuals (supplementary section) 2022* at **20 O**. Please refer to the ATO publication guide to foreign income tax offset rules to determine the amount you can claim before finalising this amount.

Rebates (24V)

If your Tax Return Information Statement has an item called Rebates with an amount next to it, include that amount in your *Tax return for individuals (supplementary section) 2022* at **24 V**. Also, write 'Rebates' in the 'Type of income – Category 4' description box next to **24 V**.

Note: If the ATO pre-fill amount for rebate income (**24 V** tax label) is different to your Tax Return Information Statement amount, always use the information provided in your Tax Return Information Statement when completing your personal income tax declaration.

Rebates paid as a result of remediation or other income paid as a result of remediation are not included in the Tax Return Information Statement. If you have received any remediation amounts for your CFSIL investment please refer to the separate correspondence provided for those payments when preparing your income tax return.

Definitions

Part A definitions

Interest Income

Interest income disclosed in Part A under label 10L refers to the gross interest derived from investments in Term Deposits and FirstRate Saver accounts.

Total current year capital gains

This amount represents the capital gains tax discounted amount grossed up plus the capital gains – other than discount method amount. Details of the components are found in Part B of the Tax Return Information Statement.

Net capital gain

For individuals and trusts the net capital gains amount is the discounted capital gains amount (50% of the Capital gains – discount method amount shown in Part B) plus the Capital gains – other than discount method amount. For companies the Net Capital gains amount is the same as the total current year capital gains amount as no discounting has been applied. For Superannuation Funds the Net Capital gains amount is calculated based on a 1/3rd discount amount of the Capital gains – discount method amount plus the Capital gains – other than discount method amount.

Part B definitions

Additional capital gains information

These amounts represent the sum of all capital gains amounts distributed to you and is provided to help you complete your return if you have capital losses. The Capital gains – discount method shown under Part B have been grossed up to 100% of the capital gains tax discounted amount shown on Part C of your consolidated Tax Return Information Statement.

Part C definitions

Dividends – unfranked not CFI

This amount represents Australian unfranked dividend income received by the trust.

Dividends – unfranked CFI

This amount represents unfranked dividend income received by the trust that is deemed to be conduit foreign income (CFI) as the underlying dividend income has a foreign source. This amount is treated as unfranked dividend income, but is exempt from non-resident withholding tax.

Interest (through Managed Investment Trusts)

This amount represents interest income received by the trust.

Interest exempt from non-resident withholding

This amount represents interest income received by the trust which is not subject to non-resident withholding tax.

Other income

This is taxable Australian income received by the trust other than interest or dividend income.

NCMI – Non-primary production

This is non-concessional MIT income (NCMI) received through investments in other trusts. For resident investors it is treated the same as Australian Other income. For non-resident investors this income is subject to 30% withholding tax.

Excluded from NCMI – Non-primary production

This income is generally NCMI income that is subject to transitional relief and is received through investments in other trusts. For resident investors it is treated the same as Australian Other income. For non-resident investors the income is subject to withholding tax, generally at the same withholding tax rate as Other Australian income.

Dividends – franked amount

This is franked dividend income received by the trust.

Discounted capital gains

This amount represents capital gains on assets held for more than 12 months and has been discounted by 50%.

Capital gains – other

This amount represents capital gains made on assets held for less than 12 months. Such gains do not qualify for the CGT discount.

TAP and NTAP

Capital Gains 'TAP' are capital gains derived directly or indirectly in relation to real Australian property. Capital Gains 'NTAP' are capital gains from assets that are 'Not Taxable Australian Property'. If you are a resident of Australia for tax purposes this distinction is irrelevant. If you are not a resident of Australia for taxation purposes this distinction may affect the amount of withholding tax deducted from your distribution.

NCMI and Excluded NCMI capital gains (Discounted and Other)

NCMI refers to Non-concessional MIT income.

Excluded from NCMI is generally NCMI income that is subject to transitional relief.

NCMI and Excluded from NCMI capital gains (Discounted and Other) are received through investments in other trusts.

For resident investors NCMI and Excluded from NCMI capital gains are treated the same as Discounted capital gain and Other capital gains amount distributed.

For non-resident investors NCMI capital gains are generally subject to 30% withholding tax.

Excluded NCMI capital gains are subject to non-resident withholding at the same rate as Other Australian Income.

CGT Gross-up amount (AMIT)

This amount is equal to the total of the Discounted capital gains amounts (TAP and NTAP, NCMI and Excluded NCMI). It is reflected in the overall CGT cost base calculations, but not included in your taxable income.

Other capital gains distribution (AMIT)

This amount represents the cash distribution of capital gains related amounts that are not otherwise disclosed on the AMMA statement. This will generally be equal to the amount of the CGT Gross up amount noted above. This amount was previously referred to as CGT concession amount.

CGT concession amount (non-AMIT)

This amount represents the non-taxable component of a discounted capital gain amount for non-AMITs. The cost base of your units are not required to be reduced upon the distribution of these amounts.

Other net foreign source income

This amount represents net foreign sourced income received by the trust.

Australian franking credits from a New Zealand franking company

The trust may have received dividend income from New Zealand companies that have Australian franking credits attached. This amount can be claimed as an imputation credit amount and should be disclosed in item 20F of the individual tax return.

Controlled Foreign Company income

Controlled foreign company income may be advised either indirectly via investments in other trusts or calculated and included in the taxable income of a trust directly where a foreign investment is deemed to be a 'controlled foreign company' (CFC).

Other definitions

Credits for TFN amounts withheld

If you have not supplied your TFN (or relevant exemption) to CFSIL, we will have deducted tax at the top marginal rate plus medicare (and any other applicable levies) from your distribution and paid it to the ATO. This TFN withholding tax will be offset against the tax payable on your income when you lodge your 2021–22 tax return. Should you wish to prevent this withholding amount from being made again, please provide us with your TFN as soon as possible.

Net exempt income

Net exempt income is usually derived indirectly via investments in other trusts that derive exempt income through infrastructure borrowings or pooled development funds.

Non-assessable non-exempt amounts

This relates to income that has specifically been deemed to be non-assessable non-exempt by the Income Tax Assessment Act. This type of income is generally received indirectly via investments in other Trusts, and will rarely arise.

Other non-attributable amounts (AMITs)

This amount broadly corresponds to amounts received by an AMIT that were previously classified as a Tax-free or Tax-deferred amount (see below).

Tax-free amounts (Non-AMITs)

This category represents non-taxable income derived by the fund. This type of income will usually be derived from infrastructure investments.

Tax-deferred amounts (Non-AMITs)

This category represents distributions that are not taxable to you. They will have arisen due to returns of capital or differences between accounting and taxable income, e.g. due to different depreciation rates which is common in relation to the assets of Property Trusts. Tax deferred amounts may reduce the cost base of your units and will need to be taken into account for CGT purposes when you redeem your units.

Net cash distribution

The total distributions you have received (including any which have been reinvested).

Withholding tax

If you are not a resident of Australia, for tax purposes CFSIL is required to withhold tax from some components of your distribution. Interest withholding tax is deducted from Australian-sourced interest income (unless it is exempt from withholding tax) and dividend withholding tax is deducted from unfranked dividends paid by Australian companies unless the income is 'conduit foreign income'. 'Australian other income' and 'TAP capital gain' components may also be subject to tax under Subdivision 12-H of the Australian Income Tax legislation. Please see your accountant for further information.

Frequently asked questions

Can everyone use this guide?

Under certain circumstances you may not be able to use this guide to complete your tax return. The following scenarios outline some of these circumstances and we encourage you to seek professional advice if you think they apply to you:

- You have any deductions relating to foreign source income. This is because your entitlement to foreign income tax offsets may be affected.
- You changed your residency status during the 2021–22 tax year. If you became a non-resident during the year you may need to lodge an Australian tax return for the part of the year that you were a resident. If you became a resident during the year you may need to apportion your distributions to the respective periods.
- You disposed of your investment shortly after receiving a distribution containing a franked dividend component.
- If you are using the information to prepare a tax return other than an Individual return (see below).

Why are there different Part C sections in my Tax Return Information Statement?

There are different Part C sections due to the different types of investments you may have.

- Our funds that are eligible have adopted the Attribution Managed Investment Trust regime (AMIT) from 1 July 2017. These funds are required to produce Attribution Managed Investment Trust Member Annual statement (AMMA) for members. The AMMA requires some components to be disclosed differently. These components are labelled with '(AMIT)'. The AMMA has cost base adjustment information to either increase or decrease the cost of your units for capital gains tax purposes. Please take this amount into account when calculating your future capital gain or loss on sale of units.
- We also have a small number of funds that have not met the eligibility requirement for AMIT. These funds will still produce a Standard Distribution Statement; the format and terms will look slightly different to the AMMA.
- We have also incorporated tax reporting for investments in term deposits and FirstRate Saver into our Tax Return Information Statement to make the statement more comprehensive for investors.
- A consolidated Part C has also been produced that has consolidated income from all of the different investment types above.

Can I claim a tax deduction for management fees and expenses incurred by the funds?

No, the management fees and expenses incurred by the funds have already been deducted from the income of the trust and are reflected in the distribution you have received.

I'm not completing a tax return, can I still claim my franking credits?

Yes, you may still be able to claim your franking credits. You can download a copy of the form – Application for refund of franking credits for individuals 2022 – from www.ato.gov.au

If the investment is made by a company, trust, superannuation fund, or partnership, is the information in this guide relevant for its tax return?

This guide is mainly prepared to assist individual investors to complete their tax return. Therefore, you should consult your accountant or financial adviser in relation to the use of the information in this guide where preparing a return for a company, trust, superannuation fund or partnership.

Can a mastertrust or IDPS use this guide?

Yes, however, you need to ensure that the investor's tax status (Individual, Trust, Company or Superannuation Fund) has been correctly recorded as this affects the capital gains information provided. (The account type is shown on the top right hand corner of the first page of your Tax Return Information Statement.)

Can the franking credits exceed the amount of my Australian taxable income?

Franking credits can exceed the amount of Australian taxable income included in your distribution because expenses are deducted from the income of the fund before the distribution payment is made. For example, let's say the fund income is \$100 and franking credits are \$50. If the fund's expenses are \$60, then income distributed to investors will be \$40 while the franking credit amount remains at \$50.

My 'Account Type' is Joint or Partnership – how should I use this tax guide?

This guide assumes an individual taxpayer client. Only one statement per account is issued. You will need to apportion the amounts on the tax statement accordingly. For example, if your account is a joint account, you will need to halve the amount on your statement and include the reduced amount in your respective individual tax return.

Need more information?

For enquiries about your personal tax matters please talk to your financial adviser or accountant.

For general enquiries about your CFSIL account, please call Investor Services on 13 13 36, Monday to Friday, 8am to 7pm, Sydney time.

Colonial First State Investments Limited ABN 98 002 348 352, AFSL 232468 (CFSIL) is the responsible entity and issuer of products made available under FirstChoice Investments and FirstChoice Wholesale Investments.

This document may include general advice but does not take into account your individual objectives, financial situation, needs or tax circumstances. The Target Market Determinations (TMD) for our financial products can be found at www.cfs.com.au/tmd, which include a description of who a financial product might suit. You should read the relevant Product Disclosure Statement (PDS) and Financial Services Guide (FSG) carefully, assess whether the information is appropriate for you, and consider talking to a financial adviser before making an investment decision. You can get the PDS and FSG at www.cfs.com.au or by calling us on 13 13 36.

Tax considerations are general and based on present tax laws and may be subject to change. You should seek independent, professional tax advice before making any decision based on this information.

CFSIL is not a registered tax (financial) adviser under the Tax Agent Services Act 2009 and you should seek tax advice from a registered tax agent or a registered tax (financial) adviser if you intend to rely on this information to satisfy the liabilities or obligations or claim entitlements that arise under a tax law. 28486/FS836/0622