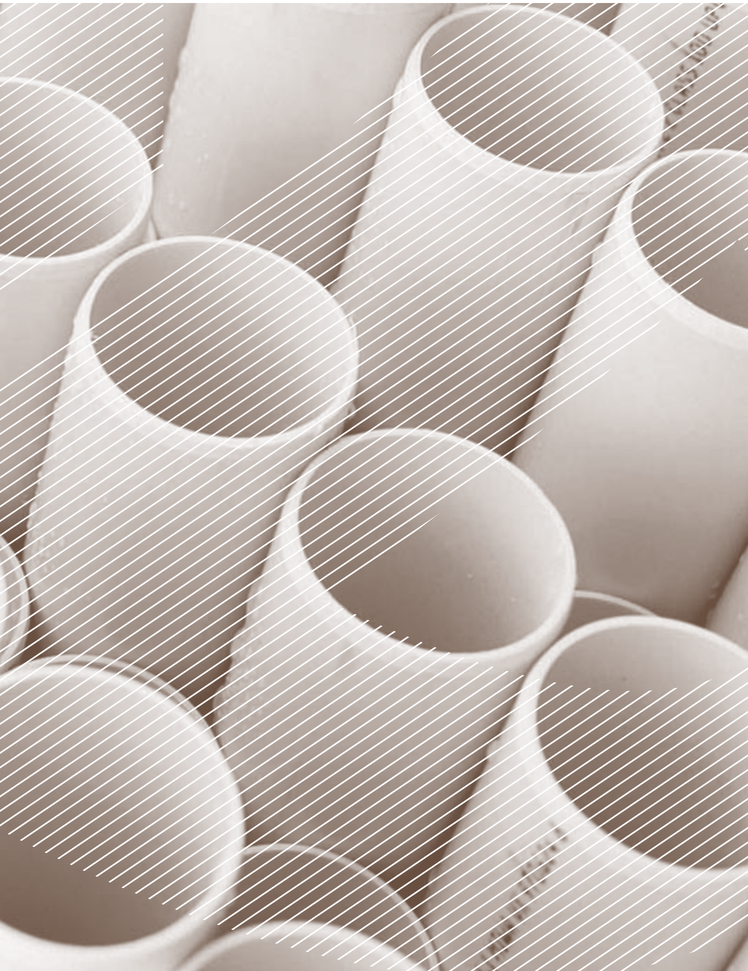
Alinta Share Scheme Participant Taxation Statement Guide 2008

Former Alinta Shareholders



Important Information

On 15 August 2007, Alinta Limited (Alinta) Shareholders approved the Schemes of Arrangement in relation to the acquisition of Alinta by ES&L Pty Ltd, the bidding vehicle of a Consortium consisting of Babcock & Brown Infrastructure ("BBI"), Babcock & Brown Power ("BBP"), Babcock & Brown Wind Partners ("BBW") (together, the "B&B Funds") and Singapore Power International Pte Ltd. The Federal Court of Australia approved the Schemes on 17 August 2007.

On 31 August 2007, the Schemes of Arrangement were implemented and Share Scheme Participants (or the Nominee, in the case of Ineligible Overseas Shareholders and Alinta Shareholders whose Shares were sold in the Cash Out Facility) were registered as the holders of the B&B Fund securities, BBI Exchangeable Preference Shares ("BBI EPS") and APA Group Securities to which they were entitled under the Share Scheme.

The purpose of this Alinta Taxation Statement Guide (the "Guide") is to provide you, as a B&B Fund Securityholder or a BBI EPS Holder who originally held Shares in Alinta prior to the acquisition of Alinta by the above Consortium, and who disposed of Alinta Shares through participation in the "Share Scheme" (as defined in the Alinta Scheme Booklet) during the year ended 30 June 2008, with general information regarding the taxation implications arising from the disposal of your Shares in Alinta.

This Guide does not discuss the specific tax implications in relation to the Alinta Option Scheme. If you held Alinta Options, you should obtain your own independent advice relating to the taxation implications associated with your participation in the Alinta Option Scheme.

This Guide has been prepared on the basis of taxation laws prevailing at the date of this Guide. You are not entitled to rely upon this information in relation to managing your specific taxation affairs. We recommend you obtain your own independent advice in relation to the taxation implications associated with your Alinta investment.

This Guide and the information stated on your Alinta Share Scheme Participant Tax Statement may also be used in conjunction with the **Babcock & Brown Online Alinta Share Scheme Participant Tax Calculator**. This interactive calculator will provide Australian Tax Resident Alinta Share Scheme Participants (subject to specified criteria) with the outputs to assist in completing their income tax compliance obligations in respect of the Scheme.

The calculator and information regarding the eligibility of Participants to use the calculator can be found on the following B&B Fund websites:

www.bbinfrastructure.com

www.bbpower.com

www.bbwindpartners.com

A comprehensive guide relating to the tax implications relevant to recipients of distributions from the B&B Funds and the disposal of B&B Fund securities should be available on the above B&B Fund websites from August 2008. If you are eligible to receive a distribution from any of the B&B Funds for the year ended 30 June 2008, a paper copy of the relevant B&B Fund tax guide will be posted to you in September 2008 (along with your B&B Fund distribution statement). The B&B Fund tax guide should assist you with the completion of your individual 2008 income tax return.

This Guide uses technical tax terms describing the character of Securityholders and the nature of the Alinta investments that are important in determining the taxation consequences from your participation in the Share Scheme and the disposal of your investment in Alinta. Where these terms are not described in the body of this Guide, a brief explanation as to their meaning is set out in the Section 4 of this Guide, and Section 16 of the Alinta Scheme Booklet. In some instances it may be difficult to determine how these terms apply to you and your investment. If this is the case, you should seek professional advice from your accountant or taxation adviser.

Index

The sections in this Guide are as follows:

Former Alinta Shareholders

Under the Share Scheme, a former Alinta Shareholder could choose between a number of different Consideration Alternatives in relation to the disposal of their Alinta Shares, including:

- Default consideration valued at $14.1667, consisting of:
  - $8.948 cash;
  - 1.599 BBI EPS valued at $1.599;
  - 0.752 BBI Stapled Securities valued at $1.2746;
  - 0.669 BBP Stapled Securities valued at $1.92; and
  - 0.260 BBW Stapled Securities valued at $0.4251;
- Maximum preference shares – which included a greater number of BBI EPS in lieu of cash and/or B&B Fund securities;
- Maximum cash – which included a greater amount of cash in lieu of BBI EPS and/or B&B Fund securities;
- Maximum securities – which included a greater amount of B&B Fund securities in lieu of cash and/or BBI EPS; or
- Cash out alternative - available only to small Alinta Shareholders (i.e. less than 1,000 shares held).

As part of the Share Scheme, Alinta also distributed 0.301 APA Securities (with a value of $1.1334) to Alinta Shareholders for each Alinta Share that they held. This distribution was made by way of a fully franked dividend of $0.93 per Alinta Share and a return of capital of $0.2034 per Alinta Share.

1 APA DISTRIBUTION

The taxation treatment of the dividend and return of capital components of the APA distribution should be considered separately.

1.1 DIVIDEND COMPONENT

The income tax treatment of the dividend received will depend upon the specific characteristics of the Alinta Shareholder as set out below.

Australian Tax Resident Individuals

If you are an Australian Tax Resident individual, you should include the dividend component of the distribution received in your Australian assessable income, together with the amount of franking credit attached to the dividend.

The franking credit attached to the dividend should generally, subject to satisfying certain holding period rules described below, be allowed as an offset against the tax payable on your total taxable income. In some circumstances, the tax offset may result in a tax refund being payable to you. The ATO has confirmed the availability of franking credits in relation to this distribution in Class Ruling CR 2007/91.

Australian Tax Resident Companies

The taxation treatment of the dividend received by an Australian Tax Resident company is generally the same as that described above for an Australian Tax Resident individual. However, the tax offset generated from the franking credits received cannot give rise to a tax refund. In certain circumstances the amount of the franking offset in excess of the tax payable by the company may be carried forward into future income years as a revenue loss. The amount of the revenue loss is calculated by dividing the excess franking offset by the corporate tax rate.

Australian Tax Resident Trusts

Distributions in the form of dividend income ultimately received by Australian Tax Resident beneficiaries of trusts should generally, subject to certain holding period rules described below, be eligible for a tax offset equal to the beneficiary's share of franking credits attached to the dividend distribution. The tax treatment of the dividend then depends on the legal identity of the beneficiary as an individual, a company or a trust.

If the trust has a net loss or does not have net income, the tax offset is effectively lost. However, if the trust has at least $1 of net income, all of the tax offset should be able to be utilised by the beneficiaries presently entitled to that net income comprising the dividend from Alinta.

In certain circumstances, the trustee may be required to make a family trust election to enable a beneficiary to obtain a tax offset from franking credits attached to dividends paid to the trust. We recommend that you seek advice from your professional adviser in this regard.

Where the trustee is subject to tax, it may also be entitled to a proportion of the franking credits on dividend distributions received in the same way as if the trustee were an individual (as discussed above).

The comments above relate to Australian Tax Resident beneficiaries who are not under a legal disability. If the beneficiary is a Non-Tax Resident or under a legal disability, we recommend you seek independent professional taxation advice.

Australian Tax Resident Superannuation Funds

The taxation treatment of the dividend received by an Australian Tax Resident superannuation fund is generally the same as that described above for an Australian Tax Resident individual. In addition, superannuation funds also receive full tax offsets for franking credits notwithstanding that part of the fund's franked distribution income may not be subject to tax. Excess offsets should be refundable.

45-Day Holding Period Rule

In certain circumstances, a former Alinta Shareholders' entitlement to the benefit of the franking credit tax offset may be denied where specific "holding period" rules relating to the underlying investment in Alinta are not satisfied.

The ATO confirmed in Class Ruling CR 2007/91 that former Alinta Shareholders will be considered to satisfy the holding period rule in relation to the dividend component of the APA Distribution received if:

- their Alinta Shares were acquired on or before 16 July 2007; and
- during the period when the Shares or interest in the Shares were held, the Shareholder had sufficient risks of loss or opportunities for gain in respect of the Shares or interest in the Shares for a continuous period of at least 45 days.

Non-Tax Residents of Australia

On the basis that the dividend to be paid to Securityholders was fully franked, no Australian dividend withholding tax should apply.

You should not otherwise be subject to Australian income tax on the dividend component of the distribution as a Non-Tax Resident Shareholder.

1.2 CAPITAL RETURN COMPONENT

As an Alinta Shareholder, the Capital Return Component of the distribution received by you will trigger a "CGT Event" and should reduce the Capital Gains Tax ("CGT") cost base in your Alinta Shares by the amount of the distribution. Any such cost base reduction is triggered when the distribution is received.

If the Capital Return Component of the distribution exceeds the cost base of your Alinta Shares calculated just prior to the cost base reduction, a prima facie capital gain equal to the excess may arise. If you are an individual, complying superannuation fund or a trust that holds Scheme securities and you had held your Scheme securities for at least 12 months prior to the Implementation Date of the Scheme (i.e. held for 12 months prior to 31 August 2007), you may be eligible for the CGT discount on any resulting capital gain. The CGT Discount reduces any net capital gain (after offsetting capital losses) that is subject to taxation by 50% (for individuals either directly or through a trust) or 33% (for superannuation funds).

Note: If you were a former Australian Gas & Light Company (AGL) Shareholder, you should be aware that the cost base of the Alinta Shares acquired under the 2006 Scheme of Arrangement between AGL and Alinta will need to be calculated in accordance with the formula set out in the relevant Class Ruling (CR 2006/125).

Cost Base of APA Securities

As a former Alinta Shareholder, the cost base of the APA Securities held after the distribution should equal $1.133 per Alinta Share previously held, being the total amount of the dividend plus the return of capital. The total cost base of the APA Securities (i.e. $1.133 x total number of Alinta Shares held) should be allocated proportionately to each APA Security held after the distribution. The date of acquisition of the APA Securities should be the same as the date of distribution of those securities.

2 DISPOSAL OF ALINTA SHARES

As noted above, this Guide and the information stated in your Alinta Share Scheme Participant Tax Statement may also be used in conjunction with the B&B Online Alinta Share Scheme Participant Tax Calculator. The interactive calculator will provide Australian Tax Resident Alinta Share Scheme Participants (subject to specified criteria), with the CGT outputs to assist in completing their tax compliance obligations in respect of the Scheme. The calculator and information regarding the eligibility of Participants to use the calculator can be found on the B&B Fund websites (as listed in the "Important Information" Section of this Guide).

This Section of the Guide only applies if you are a former Alinta Shareholder who meets all of the following conditions:

- you did not acquire your Alinta Shares under an employee share scheme;
- you satisfy the requirements of the 45 day rule for entitlement to franking credits; and
- you are not eligible to choose the indexation method when determining the amount of a capital gain in respect of your Alinta Shares.

The information in this Section assumes that you received the Default Consideration in respect of your Alinta Shares as detailed in Section 1. If you failed to meet any of the conditions, we recommend you seek appropriate independent professional advice that considers the tax consequences of the disposal of Alinta Shares in respect of your own specific circumstances.

2.1 AUSTRALIAN TAX RESIDENT SHAREHOLDERS

Capital Account

If you are a former Alinta Shareholder and held your Shares in Alinta on capital account, the income tax treatment of the different forms of consideration should be considered primarily under the CGT rules.

Please refer below and to Section 14 of the Alinta Scheme Booklet for a detailed example of the CGT calculation based on a hypothetical Alinta Shareholder scenario.

Prima Facie Capital Gain or Loss Calculation

The prima facie capital gain (or loss) realised as a result of the disposal of your Alinta Shares should be calculated as the difference between the proceeds from the Share Scheme and the cost base (or reduced cost base) of the Alinta Shares disposed of.

For CGT purposes, the proceeds from the Share Scheme should be the value of any consideration received from the disposal of Alinta Shares excluding the distribution of APA Securities as discussed above. **This information is stated on your Alinta Share Scheme Participant Tax Statement**.

To assist in calculation of the cost base of your Alinta Shares which participated in the Scheme, a time line of Alinta Security related events is provided in Section 3, accompanied by information regarding where applicable data can be sourced. These include dividend reinvestment plans, rights issues and transactions relating to former AGL Shareholders.

Your cost base should be determined after taking into account the Capital Return Component of the distribution of the APA Securities as discussed above.

For example, if the cost base of your Alinta Shares was $2.125, and the Shares were acquired at least 12 months prior to the Share Scheme, the prima facie capital gain should be calculated as follows:

Based on the closing values of the Shares on 31 August 2007, the total amount of consideration received in respect of the disposal of Alinta Shares is $14.1667. The cost base of $2.125 is first reduced by the $0.2034 return of capital discussed above, resulting in a balance of $1.9216. As such, a capital gain of $12.2451 (being $14.1667 less $1.9216) should be realised (before considering the availability of CGT rollover relief and the CGT discount).

Availability of CGT Rollover Relief

If you make a prima facie capital gain on the disposal of your Alinta Shares, you should be eligible to claim CGT rollover relief to the extent you receive BBI EPS as consideration for your Alinta Shares.

To determine the extent of the prima facie capital gain that can be disregarded, you should undertake the following steps:

- Determine the extent to which the cost base of your Alinta Shares (after taking into account the Capital Return Component of the distribution of APA Securities as discussed above), can be allocated to the BBI EPS component of your consideration (discussed below); and
- Determine the extent to which the prima facie capital gain on your Alinta Shares relates to the BBI EPS component of your consideration by subtracting the cost base (of your Alinta Shares) allocated to the BBI EPS from the value of the BBI EPS received.

Ordinarily, the cost base allocated to the BBI EPS component of consideration should be a proportion of the cost base of your Alinta Shares allocated on a reasonable basis. One such method of apportionment would be to use a relative value method. That is, the proportion of the total cost base to be applied to the BBI EPS component of the consideration received should equal the value of those BBI EPS (at the time of acquisition) relative to the total consideration received (excluding the distribution of APA Securities as discussed above).

Following on from the example above (based on you receiving the Default Consideration and the assumed facts noted above), the cost base of your Alinta Shares of $1.9216 (after the distribution of APA Securities) should be allocated to the different components of your consideration.

The table below outlines the outcome of using a relative value method of allocating the cost base based on the relative values of the proceeds received. A different allocation will arise if you elect to receive a different mixture of consideration or due to the effects of rounding:

Consideration	Capital Proceeds $	Cost Base Allocation $	Cost Base Allocated $
BBI EPS	1.599	$\left(\frac{1.599}{14.1667}\right) \times 1.9216$	0.2169
Balance of Consideration	12.5677	$\left(\frac{12.5677}{14.1667}\right) \times 1.9216$	1.7047
Total	**14.1667**	**1.9216**	**1.9216**

In order for CGT rollover relief to apply, you are required to make a choice to apply the rollover. The choice is evidenced by the disclosures made in your income tax return. No formal election or notification is required to be lodged with the ATO.

CGT rollover relief is available on the BBI EPS component of the consideration received as part of the Alinta Scheme. The ATO confirmed that CGT rollover relief will be available in their Class Ruling CR 2007/107.

Where you are eligible for and choose CGT rollover relief, you will be able to disregard the part of your prima facie capital gain that is attributable to the BBI EPS received as consideration. Accordingly, to the extent you only received BBI EPS for the disposal of your Alinta Shares and you elect for CGT rollover relief to apply, no capital gain should arise on disposal of your Alinta Shares.

We note that the choice to apply CGT rollover relief may be made on an asset by asset basis. That is, you may choose to apply the rollover relief for some of your Alinta Shares but not others.

Following on from the example above, where CGT rollover relief is chosen in relation to the BBI EPS Component of the consideration, the prima facie capital gain that can be disregarded in this situation should be $1.3821 per Alinta Share (being $1.599 of capital proceeds less $0.2169 of cost base allocated to those proceeds).

The resulting taxable gain before considering the availability of the CGT discount would be $10.863 (being the prima facie capital gain of $12.2451 less the amount disregarded under CGT rollover relief of $1.3821).

A CGT discount may be available if you make a capital gain and do not choose to apply CGT rollover relief. If you are an individual, complying superannuation fund or a trust that held the Alinta Shares and you have held your investment in Alinta for more than 12 months, you may be eligible for the CGT discount on any resulting capital gain. This reduces any net capital gain (after offsetting capital losses) that is subject to taxation by 50% (for individuals either directly or through a trust) or 33% (for superannuation funds).

Revenue Account

If you were an Alinta Shareholder who held your Shares in Alinta on revenue account you will need to undertake an income tax calculation in relation to your disposal of that investment.

If you held your Shares on revenue account, we recommend you consult your tax adviser in relation to the implications associated with the disposal of your investment.

Whether or not you held your Shares on revenue account, you will need to undertake the above noted CGT calculation (with the exception of Shareholders whose Alinta Shares were trading stock at the time of the disposal).

Cash Out Facility

Former Alinta Shareholders holding 1,000 or less Alinta Shares had the option to elect for the securities that they received in exchange for their Alinta Shares to be sold on market. The disposal of securities through the Cash Out Facility should give rise to a CGT event, with the difference between the proceeds received from that sale and the cost base in those securities giving rise to a capital gain or loss. This difference may arise, for example, because of movements in the market prices of the securities between the Implementation Date of the Share Scheme (i.e. 31 August 2007) and the date of sale under the Cash Out Facility (i.e. 3 September 2007). This calculation should be done on a security by security basis. In this case, the cost base of your securities should be the amount determined by applying the principles set out above.

If you elected to use the Cash Out Facility, the CGT discount may be available for any prima facie capital gain arising from the disposal of Alinta Shares on 31 August 2007 (on any component of consideration received). Further, the CGT discount may also be available for any prima facie capital gain arising on the disposal of the BBI EPS where you are eligible for and have chosen for CGT rollover relief to apply, as discussed above.

If you are eligible for, but do not choose CGT rollover relief, then one consequence may be to exclude from the CGT discount any capital gain that accrues on the BBI EPS between the Implementation Date of the Share Scheme and the date of the sale under the Cash Out Facility. Please refer to our comments above in relation to your eligibility for the CGT discount.

2.2 NON-TAX RESIDENT SHAREHOLDERS

Capital Account

Non-Tax Residents are exempt from Australian tax on any capital gains from CGT events occurring on or after 12 December 2006 in respect of CGT assets unless, broadly, the relevant CGT asset is taxable Australian real property, an "indirect Australian real property interest" or an asset used in carrying on a business through an Australian permanent establishment.

An indirect Australian real property interest exists at a time when a Non-Tax Resident, together with its associates, holds 10% or more of the membership interests in an entity (e.g. units in a trust) at that time or throughout a 12 month period in the two years before that time and more than 50% of the underlying market value of the entity's assets is attributable to taxable Australian real property.

The relevant CGT assets held by Non-Tax Residents are the Scheme Shares. Accordingly, the Scheme Shares themselves are not taxable Australian real property. As far as the B&B Funds are aware, no Non-Tax Resident Securityholder (together with its associates) is likely to have (or to have had for more than 12 months in the last two years) 10% or more Scheme Shares. As such, the Scheme Shares should not constitute indirect Australian real property interests.

Furthermore, holding Scheme Shares should not of itself constitute carrying on a business in Australia through a permanent establishment.

On this basis, Non-Tax Resident Securityholders should not be subject to Australian CGT upon the disposal of Scheme Shares. However, if you are a Non-Tax Resident and you, together with your associates, hold (or have held) 10% or more of the Scheme Shares, you should consult your tax adviser in relation to this matter.

Revenue Account

If your investment in Alinta was held on Revenue account you will need to undertake an income tax calculation in relation to your disposal of that investment.

If you held your investment on Revenue account you should consult your tax adviser in relation to the implications associated with the disposal of your investment.

Whether or not you hold your investment on Revenue account, you will need to undertake the above noted CGT calculation (with the exception of Shareholders whose Alinta Shares were trading stock at the time of the disposal).

3 ALINTA SHARE ISSUE HISTORY

To assist former Alinta Shareholders in establishing the cost base of their Alinta shares for capital gains tax purposes, a summary of major security related events by Alinta Limited is provided below.

Alinta Limited (ACN 087 857 001)
From 17 October 2000 to 24 October 2006

Date of Issue	Details of Issue	Issue Price $	Market Price at Date of Issue $
17 Oct 2000[1]	Initial public offering	2.25[2]	2.85
07 May 2003	Private placement of ordinary shares	4.50	4.96
23 Jul 2003	Issue of Reset Preference Shares ("RePS")	100.00	106.30
23 Mar 2004	Private placement of ordinary shares	6.75	6.00
23 Apr 2004	Rights issue of ordinary shares	5.50	5.86

Alinta Limited (ACN 119 985 590) From 25 October 2006

Date of Issue	Details of Issue	Issue Price $	Market Price at Date of Issue $
25 Oct 2006	Scheme of Arrangement – AGL[3]	Scrip for Scrip[4]	10.36
31 Aug 2007	Scheme of Arrangement – Babcock & Brown/ Singapore Power Consortium[5]	Refer personalised tax statement	Refer personalised tax statement

Notes:

1. The Initial Public Offering of Alinta Limited stapled securities was by way of a secondary offer by Gas Corporation for existing Alinta stapled securities. Each stapled security comprised one loan note stapled to one ordinary share. The stapled securities were converted to ordinary shares on 25 June 2001. The original loan notes had a face value of 12.5 cents each. On 15 March 2001, a partial repayment of 9 cents per loan note was made. On 25 June 2001, a final repayment of 3.5 cents per loan note was made.
2. The offer price for the stapled securities was $2.25 for retail purchasers and $2.45 for institutional purchasers.
3. Alinta Limited (ACN 119 985 590) was listed on the ASX on 25 October 2006 as a result of Alinta Shareholders and AGL Shareholders entering into a Scheme of Arrangement to merge the Companies to form "New Alinta". The shares of "New Alinta" are listed on the ASX with a company code of "AAN".
4. Capital gains tax scrip for scrip roll over relief may be available for "New Alinta" Shareholders who acquired their shares under the Scheme of Arrangement. Additional capital gains tax information is available on the Australian Tax Office website.

   Original Alinta Shareholders:
   Class Ruling 2006/124 : (http://law.ato.gov.au/pdf/cr06-124.pdf)

   Shareholder booklet: (www.ato.gov.au/individuals/content.asp?doc=/Content/82341.htm)

   AGL Shareholders that received AAN shares as part of the Scheme of Arrangement:
   Class Ruling 2006/125: (http://law.ato.gov.au/pdf/cr06-125.pdf)

   Shareholder booklet: (www.ato.gov.au/content/downloads/is6992-12-2006.pdf)
5. Details regarding former Alinta Shareholder's participation in the Share Scheme is available on the "Alinta Share Scheme Participant Taxation Statement" issued with this Guide as well as the Alinta Scheme Booklet.

Share Dividend History & Dividend Reinvestment Price

Alinta Limited (ACN 087 857 001)
From 17 October 2000 to 24 October 2006

Type	Date Declared	Date Paid
Loan Note Repayment	06 Feb 2001	15 Mar 2001
Loan Note Repayment	27 Apr 2001	25 Jun 2001
Final Dividend	31 Jul 2001	13 Sep 2001
Final Dividend	01 Feb 2002	14 Mar 2002
Interim Dividend	01 Aug 2002	16 Sep 2002
Final Dividend	31 Jan 2003	14 Mar 2003
Interim Dividend	15 Aug 2003	29 Sep 2003
Final Dividend	27 Feb 2004	31 Mar 2004
RePS Dividend	27 Feb 2004	31 Mar 2004
Interim Dividend	19 Aug 2004	30 Sep 2004
RePS Dividend	19 Aug 2004	30 Sep 2004
Final Dividend	24 Feb 2005	31 Mar 2005
RePS Dividend	24 Feb 2005	31 Mar 2005
Interim Dividend	02 Sep 2005	30 Sep 2005
RePS Dividend	02 Sep 2005	30 Sep 2005
Final Dividend	23 Feb 2006	31 Mar 2006
RePS Dividend	23 Feb 2006	31 Mar 2006
Interim Dividend	16 Aug 2006	29 Sep 2006
RePS Dividend	16 Aug 2006	29 Aug 2006
Transaction Dividend	02 Oct 2006	24 Oct 2006

Alinta Limited (ACN 119 985 590)
From 25 October 2006

Type	Date Declared	Date Paid
Final Dividend	28 Feb 2006	4 Apr 2007

Amount (cents)	Franking (%)	Dividend Reinvestment Price ($)
9.0	N/A	
3.5	N/A	
5.5	100	
11.0	100	
11.0	100	
14.0	100	
12.0	100	
21.0	100	
398.0	100	
15.0	100	
289.0	100	
27.0	100	8.8347
287.0	100	
21.0	100	11.2281
289.0	100	
23.0	100	10.60521
287.0	100	
23.0	100	10.8308
289.0	100	
14.625	100	Not eligible

Amount (cents)	Franking (%)	Dividend Reinvestment Price ($)
8.375	100	14.5224

4 KEY TECHNICAL TAX TERMS

"Australian Tax Resident"

If you are an individual you will be considered to be an Australian tax resident if you satisfy any one of the following tests:

- You reside in Australia under ordinary concepts. This will include a general examination of your facts to consider whether you can be considered to dwell permanently or at least for a considerable period of time in Australia;
- You are an Australian citizen and have no permanent place of abode outside Australia;
- You have been in Australia for more than half of the income year (i.e. greater than 183 days in the period 1 July to 30 June) and your usual abode is not outside Australia; or
- You are a member of a Commonwealth Superannuation Scheme (broadly, if you work for the Australian public service).

"Company"

A company will be considered to be an Australian tax resident if any of the following tests are satisfied:

- It is incorporated in Australia;
- It carries on business in Australia and its central management and control is in Australia; or
- It carries on business in Australia and has its voting power controlled by Australian Tax resident Shareholders.

"Trust or Superannuation Fund"

A trust or superannuation fund will be considered an Australian tax resident if its trustee is a resident of Australia according to the above tests.

"Non-Tax Resident" of Australia

You will be considered a Non-Resident of Australia for Australian tax purposes if you do not fall within one of the tax residence tests referred to above.

You should note that Tax Treaties between Australia and other countries may alter your residence status and in some circumstances you may be considered a dual resident. You should seek professional advice to determine your tax residence if you consider that a relevant Tax Treaty entered into between Australia and your country of residence may apply to you.

You should also note that your tax residence status can change and is tested each financial year.

"Capital Account"
Broadly, an investment will be held on "capital account" where the intention is to hold the investment so as to benefit from both distributions from the investment and the capital growth of the investment. An intention to hold an investment for an extended period of time is generally indicative of an investment held on capital account.

It is expected that the majority of Securityholders will hold their investments in BBI on capital account.

"Revenue Account"
Generally, an investment is held on "revenue account" if it was acquired with the intention of making a profit on resale, or if the investment forms part of or is incidental to a business carried on by the Securityholder. An intention not to hold the investment for a long period of time would be indicative of an investment held on revenue account. Share traders usually hold their investments on revenue account.

This is a highly complex area of taxation law. If you are not able to accurately determine whether you hold your investment on capital or revenue account, we recommend that you seek professional assistance in determining the taxation implications associated with your investment in BBI.