Australian Government

Australian Taxation Office

International dealings schedule 2021

When completing this form

Place X in ALL applicable boxes.

| Print clear | ly in BLC | JCK LET | TERS | using a | black p | en only. |
|-------------|-----------|----------------|------|---------|---------|----------|
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How to complete this form

For explanations and instructions on how to complete this schedule, refer to the International dealings schedule *instructions 2021*, available from our website at **ato.gov.au**

| 1 Nar | This schedule forms part of the tax return of: me of entity |
|-----------------|--|
| | |
| | |
| Тах | file number |
| Aus | stralian business number (ABN) |
| Se | ection A: International related party dealings |
| 1a | Does Country-by-Country reporting apply to you? A No Go to question 2a Yes Go to question 1b For information on Country-by-Country reporting, refer to the IDS instructions. |
| 1b | Have you lodged Part A of your local file at the same time as your income tax return? A No Go to question 2a Yes Go to question 18 |
| | If you choose to voluntarily lodge Part A of your local file at the same time as your income tax return, you will not need to complete questions 2 to 17 of the IDS. |
| 2a | Is the total of your international related party dealings over \$2 million? A No Go to question 17 Yes Go to question 2b |
| 2 b | Are you a small business entity, not a significant global entity and your international related party dealings do not exceed \$5 million and 50% of your current year aggregated turnover? |
| | A No Go to question 3 Yes Go to question 18 |

| 3 Did you have dea located in specif | | | tries | ;? | | | | | ÷. | | | - | | n the dealings with related parties |
|--|---|--|-----------------|---------------|------------------|--------------|----------------|----------------|------------------|-------|--------------|---|---|---|
| | es | | | | follow dollar | ving valu | infoi le of | rmat f rela | ion [.] | for t | he t tv d | three ealing | countr 18 | ries with |
| Foreign Activity country code | | | enditur | | Gona | vale | | | | pui | ., . | | ,0. | Revenue |
| B C | D \$ | |],[| | | ,[| | | , [] | | | · M | E \$ | |
| C | D \$ | | | | | | | | | | | •>> | E \$ | |
| C | D \$ | | ,_ | | | , | | | , | | | ·× | E \$ | |
| All other amount | s F \$ | | | | | , | | | , | | | ·× | G \$ | |
| | 1 4 | | ,. | | | , |] | | , <u> </u> | | | | ν¢ | |
| | b C | | ,L | | | , | | | ,∟ | | | •× | K \$ | |
| | J | | ,[| | | , |][| | , | | | · ₩ | K \$ | |
| | J | | ,[| | | , | | | , | | | · ≫ | K \$ | |
| All other amount | s L \$ | | , | | | , | | | , 🗌 | | | ·× | M \$ | |
| N | P \$ | | ,[| | | , | | | , [| | | × | Q \$ | |
| 0 | P \$ | | _,[| | | , [| | | , [| | | × | Q \$ | |
| 0 | P \$ | | | | | | | | | | | ·× | Q \$ | |
| All other amount | s R \$ | | | | | | | | | | | · X | S \$ | |
| | | | | | | ,— | | | , | | | | | |
| 4 Did you have dea | aling | s wit | th in | terr | natio | ,∟ nal | rela | | , l pa | irtie | es l | | ed in | specified countries? |
| | aling es | | | | | | | | | | | ocat | | specified countries? |
| _ | | Pro the | | the nest (| | | | | | | | ocat | | |
| A No Y Specified Activity | | Pro the Expe | ovide e higł | the nest (| | | | | | | | ocat | | specified countries? |
| A No Y Specified Activity country code | es | Pro the Expe | ovide e higł | the nest (| | | | | | | | three aling | specifi js. | specified countries? ied countries with |
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| A No Y Specified Activity country Code B C C C | es D S D S | Prc the Expe [] [] [] [] | ovide e higł | the nest (| | | | | | | | ocat three ealing •≪ | specifi js. E \$ E \$ | specified countries? ied countries with Revenue , , , , , , , , , , , , , , , , , , , |
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| A No Y Specified country Activity code B C C | es ☐ | Prrcette Expe Exp | ovide e higł | the nest (| | | | | | | | ocat three ealing -≫ -≫ -≫ -≫ -≫ | E \$ E \$ E \$ G \$ K \$ K \$ | specified countries? ied countries with Revenue , , , , , , , , , , , , , , , , , , , |
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| A No Y Specified Activity C C C C C C All other amount H C C All other amount All other amount | es □ □ \$ □ \$ □ \$ □ \$ □ \$ □ \$ □ \$ □ \$ □ \$ □ | Prrcette Expection Expec | ovide e higł | the nest (| | | | | | | | ocat three ealing ·X ·X ·X ·X ·X | specifi E \$ E \$ E \$ G \$ K \$ K \$ M \$ Q \$ | specified countries? ied countries with Revenue , , , , , , , , , , , , , , , , , , , |

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|-------------|--|
| 5 | Did you have any international related party dealings involving tangible property of a revenue nature, including trading stock and raw materials? |
| | A No Yes Provide the following information |
| | Tangible property of a revenue nature including trading stock and raw materials Percentage of dealings with documentation |
| C \$ | Expenditure Revenue methodology code |
| | |
| 6 | Did you have any international related party dealings involving royalties or licence fees? A No Yes Provide the following information |
| 60 | Royalties Percentage of dealings with |
| 6a | Deductions Income Main pricing documentation |
| C \$ | |
| 6b | Licence fees Percentage of dealings with Main pricing documentation |
| C \$ | Deductions Income methodology code |
| | |
| 7 | Did you have any international related party dealings involving rent or leasing? A No Yes Provide the following information |
| | Rent/leasing |
| | Expenditure Revenue Main pricing documentation methodology code |
| C \$ | └ , |
| 8 | Did you have any service arrangements with international related parties? |
| | A No Yes Provide the following information |
| 8a | Treasury related services 8b Management and administration services Expenditure Expenditure |
| C S | |
| DS | |
| | Main pricing Percentage of dealings with Main pricing Percentage of dealings with Main pricing Percentage of dealings with methodology documentation code methodology documentation code |
| | E F |
| 8c | Insurance services 8d Reinsurance services Expenditure |
| C S | |
| DS | |
| ט | Main pricing Percentage of dealings with Main pricing Percentage of dealings with |
| | methodology documentation code methodology documentation code E |

| 8e | Research and development services | 8f | Sales and marketing services Expenditure |
|-------------|--|-------------|--|
| C \$ | ;,,, | C \$ | |
| D \$ | | D \$ | |
| | Main pricing Percentage of dealings with methodology documentation code | Е | Main pricing Percentage of dealings with documentation code |
| E | | | |
| 8g | Software and information technology services Expenditure | 8h | Technical services Expenditure |
| C \$ | ;,,, | C \$ | |
| D \$ | | D \$ | |
| E | Main pricing Percentage of dealings with methodology documentation code | Е | Main pricing Percentage of dealings with documentation code |
| | | | |
| 8i | Logistics services Expenditure | 8j | Asset management services Expenditure |
| C \$ | | C \$ | |
| D \$ | | D \$ | |
| | Main pricing Percentage of dealings with methodology documentation code | | Main pricing methodologyPercentage of dealings with documentation code |
| E | F | E | F F |
| 8k | Other services (specify in label H below) | | |
| C \$ | | | |
| D \$ | | | |
| | Main pricing methodology Percentage of dealings with documenta | ation o | code |
| E | | | |
| н | | | |
| | | | |
| | | | |
| 9 | Did you have any derivative transactions with int | tern | ational related parties? |
| | A No Yes Provide the following information | | |
| 9a | Derivatives | | Percentage of dealings with Main pricing documentation |
| C \$ | Expenditure Revenue | | Main pricing documentation methodology code |
| 9b | Principal derivative types | | ,, |
| G1 | Derivative code Derivative code Derivative G2 G3 G3 | tive co | ode |
| 9c | Did you engage in the trading of derivatives globally the | roug | h a trading structure in which |
| н | you shared global profits from these activities with inte | mati | onai related parties? |
| | | | |
| | | | |
| L | | | |

| 10 Did you enter into any debt factoring or securitisation arrangements with international related parties? A No Yes Provide the following information |
|--|
| 10a Debt factoring Main pricing Book value Consideration C \$,,, D \$,, E F |
| 10b Securitisation Main pricing methodology Percentage of dealings with documentation code Book value Consideration •× E F |
| 11 Did you have any dealings of a financial nature other than those covered in questions 9 and 10 with international related parties? |
| A No Yes Provide the following information Interest bearing loans – Average balance Interest free loans – Average balance |
| 11a Amounts borrowed I\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| 11b Amounts loaned I \$ |
| 11c Interest Expenditure Nain pricing methodology Percentage of dealings with documentation code C\$, |
| 11d Guarantees Expenditure Main pricing methodology Percentage of dealings with documentation code C \$ |
| 11e Insurance Expenditure Revenue Main pricing methodology Percentage of dealings with documentation code C \$ |
| 11f Reinsurance Revenue Main pricing methodology Percentage of dealings with documentation code C \$ |



| 11g Have you returned a foreign exchange gain or deducted a foreign exchange loss in relation international related parties? | to dealings with |
|---|--|
| A No Yes Provide the following information for the three types of related party de total dollar value of foreign exchange gain and foreign exchange loss. | alings with the highest |
| Transaction type Currency Foreign exchange losses deducted Foreign exchange ga | |
| B C D\$, , |], ,× |
| C D\$, D, C |],□,□∞ |
| C D\$ |],□□□,□□⊡·≫ |
| All other currencies F\$ | , , · × . |
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| N 0 P\$,,,,, Q\$, |],,∞ |
| 0 P\$,,,,, Q\$, |],□□□,□□⊡·≫ |
| 0 |],□□□,□□·∞ |
| |],□□□,□□·∞ |
| 11h Other financial dealings (specify in label H below) | Percentage of dealings with |
| | Main pricing documentation methodology code |
| C \$,,, D \$,,, .∞ | E |
| H | |
| | |
| | |
| 12 Did you have any other international related party dealings of a revenue nature n questions 5 to 11? | ot reported at |
| A No Yes Provide the following information | Percentage |
| Other (specify in label H below) Expenditure Revenue | Main pricing documentation methodology code |
| | |
| Description | |
| H | |
| | |
| | |

OFFICIAL: Sensitive (when completed)

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| 13 | Did you dispose of or acquire any tangible/intangible property of a non-revenue to or from international related parties not reported at questions 5 to 11? | (capital) nat | ure |
|--------------------|---|--|---|
| | A No Yes Provide the following information | | Porcontago |
| 13a | Disposal or acquisition of tangible property | Main capital asset pricing | Percentage of dealings with documentation |
| C \$ | Consideration paid Consideration received | G G | F |
| 13b C \$ | Assignment of intellectual property Consideration paid Consideration received D Consideration received Consideration received Consideration received | Main capital asset pricing methodology | Percentage of dealings with documentation code |
| 13c C \$ | Assignment of shares or other equity interests Consideration paid Consideration received D Consideration received | Main capital asset pricing methodology | Percentage of dealings with documentation code |
| 13d C \$ | Assignment of loans or debts (not liabilities) Consideration paid Consideration received D \$, , , , , , , , , , , , , , , , , , | Main capital asset pricing methodology | Percentage of dealings with documentation code |
| 13e C \$ | Other disposal or acquisition of intangible property Consideration paid Consideration received D\$ Consideration received Consideration received | Main capital asset pricing methodology | Percentage of dealings with documentation code |
| 13f C \$ | Cost plus remuneration for R&D type services Did you receive or were entitled to receive remuneration from international related parties of performance of R&D type services? A No Yes Provide the following information Costs on which margin calculated Cost-plus margin remuneration | n a cost-plus l | oasis for the |
| 14 | following for a non-monetary payment to/from an international related party? services assets liabilities | t, or receive | any of the |
| | | e Nature of item | 7334 |
| 14a | No payment B C D E | | 50921 |
| 14b | Non-monetary payment B C C D D E | | |

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| 15 | Did you provide or receive share-based employee remuneration to or from an international related party? |
| | A No Provide the following information for any international related party recharge amounts you provided or received as part of those arrangements. |
| | Recharge amounts C \$ \square |
| 16 | Were you a party to a cost contribution arrangement for developing, producing or obtaining assets or rights with an international related party? A No Yes |
| 17 | Did a restructuring event(s) occur in the current year involving international related parties or your branch operations? |
| 17a | A No Go to question 17b Yes Provide the following information for the three most material restructuring event(s) |
| | involving international related parties or your branch operations. Restructuring event 1 Entity or branch Capital value Appendix 7 code Foreign country documentation code C D E C D E C C D C C C C C C C C C C |
| | H |
| | |
| | Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken? |
| | Restructuring event 2 Entity or branch Capital value Appendix 7 code Foreign country Percentage of dealings with documentation code C D E G F F Description H F F F |
| | |
| | Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken? I No Yes |
| | Restructuring event 3 Percentage of dealings with documentation code Entity or branch Capital value Appendix 7 code Foreign country documentation code D E G F F Description E F F |
| | H |
| | Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken? |
| 17b | During the last three income years (including the current income year) did you revalue any assets following a restructuring event(s) involving international related parties or your branch operations? B No Yes |

| 18 | Do you have an | ny branch | ı opei | ration | s (inc | ludin | g Aust | ralian | branc | h ope | eratio | ons | if yo | u are | a n | on-re | eside | nt)? |
|----------|--|--|--|---|---|---|---|--|--|---|-------------------------------|----------------------|--------------------|----------------------|-----|------------------------|----------|-------------|
| | A No | Yes 📄 F | Provide | e the fo | llowing | g inforr | mation | | | | | | | | | | | |
| | Amounts claimed or returned for your internally recorded dealings with your branch operations | | | | | | | | | | | | | | | | | |
| | 18a Amounts borrowed 18b Amounts loaned | | | | | | | | | | | | | | | | | |
| | Interest | balance | \$ | ,[| | _, | ,_ | | _·× | 1\$ | | | | , | | , | | _·≫ |
| | bearing loans | Interest J | \$ | , | | _,L | ,_ | | ·× | J \$ | | , | | , | | , | | ·× |
| | Interest free loans for TR 2005/11 | Average K balance | \$ | _, | |], | | | · ≫ | K\$ | |], | | _, | | , | |]·× |
| 18c | Internal trading | | | ng stoc | k purch | ase cos | its | | | | Trading | stoc | < sale | s proce | eds | | | |
| | stock transfers | | \$ | , | | _, | ,_ | | . ≫ | J \$ | | , | | , | | , | | _•≫ |
| 18d | Amounts claimed returned for other internally recorde Description of amount | d dealings | \$ | unts cla | |], | ,[| | . ∾ | J\$ [| Amour | ts reti | | _,[| | ,[| |] ∙≫ |
| L | | | | | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | | | | | |
| | If you have mo That is, record | | | | | | | | | | | | | | | | | |
| | of other intern | ally recorde | | | | | | | | | | | | | าท | | | |
| | aa an attaahm | ant to the | | | you ai | elougi | ing a pa | perieu | | | o uuc | ILION | | Jinali | | | | |
| | as an attachm | nent to the | | | you ai | e lougi | ng a pa | perieu | | | 0 444 | | | JIIIau | 511 | | | |
| <u> </u> | | | Sched | ule. | - | | <u> </u> | | | | | | | | | - | 73 | |
| Se 19 | ection B: Fi r Did you hold a | 1ancia ny financi | Sched | ule. ran | gen | nen | ts | | | | | | | | | - | 73345102 | |
| | ection B: Fir Did you hold an following apply | nancia ny financi v: | Sched I ar ing ar | rango rango | gen emen | nen [.] ts du | ts ring the | e inco | me ye | ar wh | nere | | | | | - | | |
| | ection B: Fin Did you hold an following apply the arrangen the character <i>Income Tax</i> | nancia ny financi r: nent was risation b Assessme | Sched | rango rango red in cen de | gen emen to wi | nen ts du th inte | ts ring the ernatio uity is o | e inco onal re differe | me ye lated | ear wh partie der Di | nere es ivisio | both n 97 | of ' | the f the | | - | | |
| | ection B: Fin Did you hold an following apply the arrangen the characte | nancia ny financi r: nent was risation t Assessme ng purpos | Sched I ar ing ar enter betwe ent Ac ses. | range range red in een de ct 199 | gen emen to wi ebt ar 97 (IT/ | nen ts dui th inte nd equ AA 19 | ts ring the ernatio uity is (97) (de | e inco onal re differe | me ye lated | ear wh partie der Di | nere es ivisio | both n 97 | of ' | the f the | | - | = | |
| | ection B: Fin Did you hold an following apply the arrangen the characte <i>Income Tax A</i> for accountin | nancia ny financi r: nent was risation b Assessme ng purpos Yes) F | Sched I ar ing ar enter petwe ent Ac ses. Provide | range range red in een de ct 199 | gen emen to wi ebt ar 97 (IT/ | nen ts du th inte | ts ring the ernatio uity is (97) (de | e inco onal re differe | me ye lated j ent unc uity ru | ear wh partie der Di les) fr | nere es ivisio | both n 97 /our | of 4 of trea | the f the atme | | - | = | |
| | ection B: Fin Did you hold an following apply the arrangen the characte <i>Income Tax A</i> for accountin A No | nancia ny financi r: nent was prisation to Assessme ng purpos Yes) F | Sched | range range red in een de ct 199 | gen emen to wi ebt ar 97 (IT/ | nen ts dui th inte nd equ AA 19 | ts ring the ernatio uity is (97) (de | e inco onal re differe | me ye lated j ent unc uity ru | ear wh partie der Di les) fr | nere es ivisio rom y | both n 97 /our | of 4 of trea | the f the atme | | - | = | |
| | ection B: Fin Did you hold an following apply the arrangen the characte <i>Income Tax /</i> for accountin A No | nancia ny financi risation ta Assessme ng purpos Yes () F | Sched | range range red in een de ct 199 | gen emen to wi ebt ar 97 (IT/ | nen ts dui th inte nd equ AA 19 | ts ring the ernatio uity is (97) (de | e inco onal re differe | ime ye elated i ent unc uity ru | ear wh partie der Di les) fr | nere es ivisio rom y | both n 97 /our | of 4 of trea | the f the atme | | - | = |).× |
| 19 | ection B: Fin Did you hold an following apply the arrangen the character <i>Income Tax A</i> for accountin A No Average quarterly balance of debt in Average quarterly balance of | nancial arr | Sched | range red in een de ct 199 | gen emen to wi ebt ar o7 (IT/ ullowing ceived | nen ts dui th inte nd equ AA 19 g inforr | ts ring the ernatio uity is o 97) (de mation | e inco onal re differe bt equ | me ye elated ent unc uity ru | ear wh partie der Di les) fr C \$ [E \$ [| here | both n 97 /our | videc | the f the atme | nt | - ,[,[,[],[]] | | |
| 19 | ection B: Fin Did you hold an following apply the arrangen the character <i>Income Tax /</i> for accountin A No Average quarterly balance of debt in Average quarterly balance of equity interests Did you have a fi | nancial arr | Sched | range red in een de ct 199 the fc punts re | gen emen to wi ebt ar 07 (IT/ llowin; ceived | nen ts dui th inte nd equ AA 19 g inforr | ts ring the ernatio uity is o 97) (de mation | e inco onal re differe bt equ | me ye elated ent unc uity ru | ear wh partie der Di les) fr C \$ [E \$ [| here | both n 97 /our | videc | the f the atme | nt | - ,[,[,[],[],[],[]] | | |
| 19 | ection B: Fin Did you hold an following apply the arrangen the character <i>Income Tax A</i> for accountin A No Average quarterly balance of debt in Average quarterly balance of equity interests Did you have a fi purposes of Divis A No Total TOFA valu B \$ | nancial arr sion 974? Yes) F | Sched | range range red in een de ct 199 e the fc punts re , , , , , , , , , , , , , , , , , , , | gen emen to wi ebt ar or (IT) llowing ceived | nen ts dui th inte nd equ AA 19 g inforr],[]] purpo g inforr | ts ring the ernatio uity is o 97) (de mation | e inco onal re differe bt equ | me ye elated ent unc uity ru | ear wh partie der Di les) fr C \$ [E \$ [| here | both n 97 /our | videc | the f the atme | nt | - ,[,[,[],[],[],[]] | | |
| 19 | Ction B: Fin Did you hold an following apply the arrangen the character <i>Income Tax /</i> for accountin A No Average quarterly balance of debt in Average quarterly balance of genity interests Did you have a fi purposes of Divis A No Total TOFA value | nancial arr sion 974? Yes) F | Sched | range range red in een de ct 199 e the fc punts re , , , , , , , , , , , , , , , , , , , | gen emen to wi ebt ar or (IT) llowing ceived | nen ts dui th inte nd equ AA 19 g inforr],],],],],],],],],],],],], | ts ring the ernatio uity is o 97) (de mation | e inco onal re differe bt equ | me ye elated ent unc uity ru | ear wh partie der Di les) fr C \$ [E \$ [| here | both n 97 /our | videc | the f the atme | nt | - ,[intere | | |
| 19 | ection B: Fin Did you hold an following apply the arrangen the character <i>Income Tax /</i> for accountin A No Average quarterly balance of debt in Average quarterly balance of equity interests Did you have a fi purposes of Divis A No Total TOFA valu B \$ | nancial arr sion 974? Yes) F nancial arr sion 974? Yes) F e of those fina DFA gains for | Sched | range range red in een de ct 199 e the fc punts re , , , , , , , , , , , , , , , , , , , | gen emen to wi ebt ar or (IT) llowing ceived | nen ts dui th inte nd equ AA 19 g inforr ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | ts ring the ernatio uity is o 97) (de mation | e inco onal re differe bt equ | me ye elated ent unc uity ru | ear wh partie der Di les) fr C \$ [E \$ [| here | both n 97 /our | videc | the f the atme | nt | - ,[, | | |

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| 20 | Are you subject to the Taxation of Financial Arrangements rules contained in Division 230 of the ITAA 1997? |
| | A No Yes Specify which tax timing method elections you have made. |
| | Fair value method B Foreign exchange retranslation method – qualifying D Reliance on financial F reports method F |
| | Foreign exchange retranslation C Hedging financial E No elections made G |
| Se | ection C: Interests in foreign entities |
| 21 | Controlled foreign companies (CFCs) and controlled foreign trusts (CFTs) |
| 21a | Did you have any interests in CFCs or CFTs? |
| | A No Go to question 24 Yes Provide the following information |
| 21b | Specify the number of CFCs and CFTs in which you had an interest at the end of your income year Listed countries Specified countries Other unlisted countries |
| | Number of CFCs and CFTs B C D |
| 21c | Did you acquire any interests in CFCs or CFTs during the income year? |
| | A No Yes Specify the number of CFCs or CFTs of which you acquired any interests during the income year |
| | Number of CFCs and CFTs B C D |
| 21d | Did you dispose of any interests in CFCs or CFTs during the income year? |
| | A No Yes Specify the number of CFCs or CFTs of which you disposed any interests during the income year |
| | Listed countries Specified countries Other unlisted countries Number of CFCs and CFTs B C D |
| 21e | Have your CFCs in the following countries satisfied the active income test for their statutory accounting period(s) |
| | under section 432 of ITAA 1936? Listed countries Specified countries Other unlisted countries |
| | A No Yes B No Yes C No Yes |
| 21f | Did you exclude tainted interest income from the passive income of a CFC which was an AFI subsidiary? |
| | A No Yes Provide the following information |
| | Financial intermediary business |
| | Did your AFI subsidiary CFCs have banking licences in their countries? |
| | |
| | Did your AFI subsidiary CFCs principally derive their income from the lending of money? C No Go to question 22 Yes Provide the following information |
| | C No Go to question 22 Yes Provide the following information Specify the total amount of tainted interest income excluded from passive income of your financial intermediary |
| | subsidiary CFCs (excluding CFCs with banking licences in their country) |
| | |
| | |
| | |
| | |
| | Specify the number of your financial intermediary CFCs which excluded tainted interest income from passive income (excluding CFCs with banking licences in their country) |
| | Listed countries Specified countries Other unlisted countries |
| | |
| L_ | Page 10 OFFICIAL: Sensitive (when completed) |

22 Specify the amounts included in your assessable income under the following sections of the *Income Tax Assessment Act 1936* (ITAA 1936).

| | Section 456 – CFCs attributable income | |
|--------------------------|--|---|
| Listed countries | \$,,,× | |
| Specified countries | \$,,,∞ | |
| Other unlisted countries | \$,,,,∞ | |
| Total | \$,,,,∞ | |
| | Section 457 – CFCs change of residence | |
| | \$,,,∞ | |
| | Section 459A – CFCs / CFTs and interposed Australian entitie | s |
| | \$,,,∞ | |

22a Specify the gross revenue included in the gross turnover of your CFCs that have satisfied the active income test.

| Listed countries |
|--------------------------|
| A \$,,,, |
| Specified countries |
| B\$,,,,, |
| Other unlisted countries |
| C \$,,, ∞ |
| Total D \$,,,, |
| C \$,,,∞ |

22b Specify the gross revenue included in the gross turnover of your CFCs that have not satisfied the active income test.

| Listed countries | | | | | | | |
|-------------------------|-----|--|-----|--|-----|--|-----|
| A \$ | _,_ | |],[| |],[| |]∙≫ |
| Specified countries | | | | | | | |
| B \$ | , | |],[| |],[| |]•≫ |
| Other unlisted countrie | s | | | | | | |
| C \$ | , | |],[| |],[| | .₩ |
| Total D \$ | _,[| |],[| |],[| | ·× |



23 Specify the amounts in determining your attribution income for your CFCs

Г

23a Specify the amounts of notional assessable income under the following sections of the ITAA 1936.

| Listed countries | s CFC (Section 385) |
|---------------------------|---|
| | Adjusted tainted income that is eligible designated concession income |
| | A\$,,,,,, |
| | Adjusted tainted income not treated as derived from sources in listed countries |
| | B\$ |
| | Other notional assessable income |
| (| |
| Subtotal (Add A, B and C) | D\$,,,,∞ |
| Specified count | tries CFC (Section 384) |
| | |
| l | |
| | Other notional assessable income |
| l | F\$,,,,,,,,,_ |
| Subtotal (Add E and F) | G\$,,,,,∞ |
| Other unlisted of | countries CFC (Section 384) |
| | |
| l l | |
| | Other notional assessable income |
| Subtotal | |
| (Add H and I) | J\$,,,,,,∞ |
| Total notion | al assessable income Add subtotals K \$ Add subtotals K \$ |
| 23b Specify the | e amounts of notional allowable deductions |
| Listed countries | |
| | \$,,,∞ |
| Specified count | tries |
| В | \$,,,∞ |
| Other unlisted of | |
| C | \$,,,∞ |
| Total notion | al allowable deductions D \$ |

24 Do you have foreign branch operations or any direct or indirect interests in foreign companies or foreign trusts?

| | A No Go t | o ques | tion 2 [°] | 7 | | | | | | | | | | | | | | | | | | | |
|----|---|---------------------|---------------------|---------------------|------------------|------------------|----------------|---------------|-------------------|------------------|-----------------------|-------------|--------|----------|-------|-------|-------------|------|------------|-------|------|------------|--------|
| | Yes Spendor | cify the -assess | amou able u | unt of f under f | oreigr the fo | n inco Ilowin | me yo g sec | ou d tions | eriveo s of th | d that ne ITA | is A 1936 (| or ITA | A 19 | 997. | | | | | | | | | |
| | | 24a S in | | n 23Al e of Ai | | | | | 5 | | | | | | | | | | | | | | |
| | Listed countries | B \$ | _□, | |], | |][], | , [][| | ·× | | | | | | | | | | | | | |
| | Specified countries | C \$ |], | |], | |][], | , | |]• ≫ | | | | | | | | | | | | | |
| | Other unlisted countries | D \$ |], | |], | |], | , | |]•× | | | | | | | | | | | | | |
| | | 24b N se | | educti 1 23AF | | | | | | | ving | | | | | | | | | | | | |
| | | E \$ |], | |], | |], | , | |]• × | | | | | | | | | | | | | |
| | | 24c S | ection | n 23 A I | _ am | ount | e nai | d | | | | 24e | | | | | | | | gn eo | | tici | oation |
| | | | | attribu | | | | | | | | | | | | | | | | anies | | cion | Sation |
| | Listed countries | B \$ |], | |], | |], | , | |]•× | | B \$ | | | , | | , | | | _,[| | | ·× |
| | Specified countries | |], | |], | |][], | , | |]• ≫ | | C \$ | | | , | | , | | | _,[| | | ·× |
| | Other unlisted countries | D \$ | | |], | |], | , | | ·× | | D \$ | | , | , | | , | | | , | | | ·X |
| 25 | Did you have (s25-90 or 230 | | | educ | tions | s in e | arni | ng r | non- | asse | ssable | non | -exe | emj | ot f | ore | ign | inc | or | e | | | |
| | A No | Yes | | Specify | the t | otal a | moun 197 | nt of | debt | deduo | ctions cla | aimed | l unc | der s | \$25- | -90 (| or | | | | | | |
| | Debt deduction foreign income | is in ea claime | rning | non-a | asses | sable | e non | -exe | | BS | | | | | | | | | | ·× | | | |
| 26 | | | | | | | | | te in | rola | tion to | , | int | , oro | et i | n 2 | for | oia | <u>n c</u> | | anv | 2 | |
| 20 | A No | | | | | | | | | | gains/los de pursi | - | | | | | | | | | | | npanie |
| | Capital gain am | | | | | | | | | | de pursi | | | bdiv | /isio | n 76 | <u> 8-0</u> | g of | the | ITAA | 1997 | ` . | |
| | oupital gain an | lounto | | · L | | J,∟ L 1 | | _,∟ | | ,[| | | | | | | | | | | | | |
| | Capital gain rec | luction | S | C \$ | |],[]][| | _, | | _, | | •₩ | | | | | | | | | | | |
| | Capital loss am | ounts | | D \$ | | , | |],[| | _, | | ·X | | | | | | | | | | | |
| | Capital loss red | luction | S | E \$ | | , | | , | | _, | | ·× | | | | | | | | | | | |
| 27 | During the las transfer property existence dur | erty, n | none | y or s | ervio | ces t | | _ | | | | - | | - C | _ | | | | - | | | | in |
| | A No | Yes |) F | Provide | e the f | ollowi | ng int | form | ation | for th | e three t | ransfe | ers v | vith | the | high | nest | doll | ar v | alue. | | | |
| | | Tra | ansfer a | amount | , , | | | | | 1 | Ар | pendix | (8 ex | emp | tion | code |) | | | | | | |
| | Transfer 1 | B \$ | , ∐ | | | | , ∐, | | | •≫ | C | | | | | | | | | | | | |
| | Transfer 2 | B \$ | | | | | | | | •>> | C | | | | | | | | | | | | |

·**M**

C

B \$

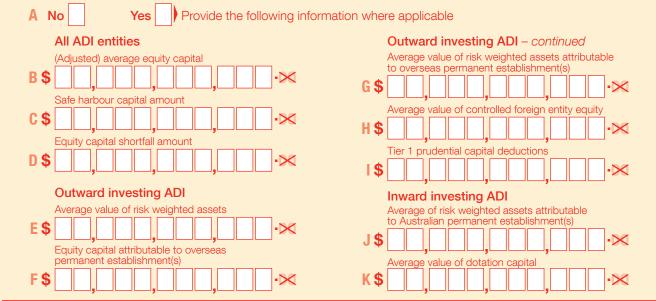
Transfer 3

| Г | |
|-----|--|
| 28 | Non-resident trusts and foreign hubs |
| 28a | Were you a beneficiary of a non-resident trust or did you have an interest in, or an entitlement to acquire an interest in, either the income or capital of a non-resident trust during the income year? |
| | A No Yes |
| 28b | Do any of the schedules within PCG 2017/1 apply to your offshore dealings? |
| | A No Provide the following information for the types of hub arrangements that have the highest dollar value of property or services imported to, or exported from, Australia. |
| | Type of hub Value of expenses/imports in connection with each type of hub Value of revenue/exports in connection with each type of hub B C , < |
| | E F\$, , |
| | H I\$ _ , , , |
| 29 | Cross-border hybrid entities and hybrid instruments |
| 29a | Were you a partner in a foreign hybrid limited partnership (FHLP) or a shareholder in a foreign hybrid company (FHC)? |
| | A No Yes Provide the following information |
| | Number of FHLPs or FHCs you had an interest in B |
| | Total amount of your share of FHLP/FHCs net income/profit C \$ |
| | |
| Se | ection D: Thin capitalisation |
| | a Did the thin capitalisation rules affect you? |
| 000 | A No Go to question 30b Yes Go to question 31 |
| 30b | Did you rely on one of the following tests in determining the thin capitalisation rules did not disallow any of your debt deductions? |
| | A \$2 million threshold test No Go to question 40 |
| | B 90% asset threshold test No Go to question 40 |
| | C Exemption of certain special purpose entities No Go to question 40 |
| 31 | Has an Australian resident company elected under subdivision 820-FB of the ITAA 1997 to treat your qualifying Australian branch operations as part of a consolidated group, MEC group or a single company for thin capitalisation purposes? |
| | A No Provide the ABN of the entity making that election, then go to question 40. |
| | Australian business number (ABN) B |
| 32 | What was your entity type at the end of the income year? |
| | A Code |
| 33 | Did you change your entity status from 'general' to 'financial' during the income year? |
| | A No Yes |
| 34 | What method did you use to calculate your average values? |
| | A Code |
| | |
| 1 | |

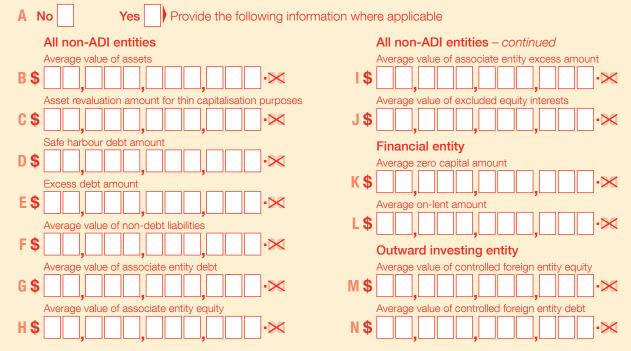
35 General information - to be completed by all thin capitalisation entities

| Debt deductions | A\$,,,× |
|---|---------------------|
| Debt deductions on debt from related non-residents | B\$,,,, |
| Amount of debt deduction disallowed | c\$,,,,,,.∞ |
| Adjusted average debt | D\$,,,,, |

36 Were you an authorised deposit taking institution (ADI) for the income year? Answer 'Yes' if you entered code 7 or 8 at Question 32 label A.



37 Were you a non-authorised deposit taking institution (non-ADI) for the income year? Answer 'Yes' if you entered code 1, 2, 3, 4, 5, 6, 9 or 10 at question 32, label A.



| - | | |
|---------|---|--|
| I 38 | Did you rely on arm's length tests? | |
| 30 | | ebt (non-ADI) or capital (ADI) amount |
| | | |
| | | |
| 39 | Did you rely on worldwide gearing debt/capita | |
| | A No Yes Provide the following information | |
| | ADI Worldwide group capital ratio | Non-ADI Worldwide debt |
| | B | D \$,,,× |
| | Vorldwide capital amount | Worldwide equity |
| | ••••••••••••••••••••••••••••••••••••••• | Worldwide gearing debt amount |
| | | F \$,,,, |
| | | |
| | | G \$,,,,, |
| | | н\$ |
| | | |
| | ction E: Financial Services Enti | ties |
| | | ncial entity that has not elected out of Part IIIB |
| 40 | of the ITAA 1936? | |
| | A No Go to question 40c Yes Provide | e the following information at 40a ${f B}$ to ${f F}$ and 40b ${f G}$ to ${f J}$ |
| 40a | Notional amount of interest under Part IIIB | |
| | Average quarterly notional amount taken to be borro | owed under section 160ZZZ |
| | B\$ | ken to be howeved under costien 100777 |
| | Specify the main currency of the notional amount tal | ken to be borrowed under section 160222 |
| | Notional amount of interest taken to be paid under s | ection 160777A |
| | (excluding amounts attributable to OB activities of o | |
| | D\$ | |
| | E S | ection 160ZZZA attributable to OB activities of OBUs |
| | Amount of section 160ZZZJ withholding tax paid on | notional interest amount |
| | F\$ | |
| 40b | Notional derivative and foreign exchange transaction | ns under Part IIIB |
| | Notional amount taken to be paid or received under | |
| | | punt taken to be paid) |
| | | punt taken to be received) |
| | Notional amount taken to be paid or received under | |
| | | punt taken to be paid) |
| | | bunt taken to be received) |

| 40c | Are you a foreign bank or other qualifying financial entit | y that has elected out of Part IIIB of the ITAA 1936? |
|---------|---|---|
| | K No Yes Provide the following informatio | n at L to P |
| | Average quarterly notional amount taken to be borrowe | d under section 160ZZZ |
| | L\$,,,,,,× | |
| | Specify the main currency of the notional amount taken | to be borrowed under section 160ZZZ |
| | M | |
| | Notional amount of interest taken to be paid under sect (excluding amounts attributable to OB activities of offsh | ion 160ZZZA |
| | N \$ | lore banking units (OBOS) |
| | | |
| | Notional amount of interest taken to be paid under sect | ion 160222A attributable to OB activities of OBUs |
| | | |
| | Amount of section 160ZZZJ withholding tax paid on not | tional interest amount |
| | P\$,,,,, | |
| 40d | Did you have amounts denied under section 160ZZZL o | f the ITAA 1936? |
| | Q No Yes Provide the following information | n |
| | Amount denied under section 160ZZZL of the ITAA 1936 | 6 |
| | R\$ | |
| <u></u> | Ware you an offenere benking unit (OPLI) or the h | and company of a consolidated group |
| 41 | Were you an offshore banking unit (OBU) or the h that included an OBU? | lead company of a consolidated group |
| | A No Yes Provide the following informatio | n |
| | 41a Borrowing | 41b Lending |
| | | |
| | B\$ | |
| | | |
| | Assessable OB income from related parties | Assessable OB income from related parties |
| | | |
| | 41c Guarantee-type | 41d Trading |
| | Assessable OB income | Assessable OB income |
| | Net OB income/loss | |
| | C \$,,,,,,, | €\$,,,,,,,, |
| | | |
| | D\$,,,,, | D\$,,,, |

41 Were you an offshore banking unit (OBU) or the head company of a consolidated group that included an OBU? – *continued*

| 41e Eligible contract | 41f Investment |
|--|--|
| Assessable OB income | |
| | |
| Assessable OB income from related parties | Assessable OB income from related parties |
| 41g Advisory | 41h Hedging |
| | |
| | |
| Assessable OB income from related parties | Assessable OB income from related parties |
| 410 Leasing | |
| Assessable OB income | |
| | |
| Assessable OB income from related parties | |
| 41i Other – as declared by regulation | 41j General OB deduction and apportionable OB deductions |
| | C \$,,,,,, |
| | |
| Assessable OB income from related parties | |
| 41m Total assessable OB Income / less Total OB deductions | 41n Eligible fraction of foreign income tax on OB income claimed under division 770 |
| Assessable OB income | E\$,,,,,.∞ |
| | |
| Assessable OB income from related parties | |

Section F: Miscellaneous

D\$

E\$

Section 128FA exempt interest paid

| 42 | Did you have a Conduit Foreign Income balance and/or distribute amounts of Conduit Foreign Income during the income year? |
|----|--|
| | A No Yes Provide the following information |
| | Balance of conduit foreign income B\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| | Conduit foreign income distributed during income year C \$,, _, |
| 43 | Do you have an unfranked non portfolio dividend account (section 46FB ITAA 1936)? |
| | A No Provide the following information |
| | Balance of unfranked non-portfolio dividend account at year end Code B \$,,,,, / |
| 44 | Did you pay amounts of interest exempt from withholding tax during the income year? |
| | A No Provide the following information |
| | Interest paid to financial institution exempt from withholding under a DTA DTA country B\$,,,,, C |
| | Section 128E exempt interest paid |

·×

·**X**

| 1 | | | |
|---|-------------------------------|---|--|
| Section G: Hybrid Misi | matches | | |
| 45 Did the hybrid mismatch rule | | | |
| A No Go to question 49 | Yes Provide the fo | ollowing information | |
| 46 Have you made or received a | a payment at any time | during the income ve | ear which gave rise to a |
| deduction / non-inclusion or | | | |
| A No Go to question 47 | Yes Provide the fo | ollowing information | |
| 46a Total amount of payments w deduction mismatches | which gave rise to ded | uction/non-inclusion | mismatches and deduction/ |
| B\$,,,, | | | |
| 46b List top three material arran | gements which gave | rise to the mismatch | |
| Type of hybrid mismatch arrangement | Foreign country | | ents made during income year |
| | B | C \$,, | |
| A | B | C\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | ,∞ |
| A | В | C \$ | ∞ |
| Total amount of deductions denied | or amount of income inclusion | Reason for difference | Were you the recipient of the payment? |
| D\$,,,, | ·∞ | E | F No Yes |
| D\$ | | E | F No Yes |
| D\$ | | E | F No Yes |
| | | | |
| 47 Do your international related | | ore hybrid mismatch | ? |
| | e the following information | | |
| Total amount of deductions denied under | subdivision 832-H | | |
| ••• [_]_,[_][_],[_][_],[_][_], | | | |
| 48 Did you pay an amount of int international related party w | | | |
| | e the following information | taxed at 10% of less | ſ |
| | - | | |
| 48a Total amount of deductions | | 1 832-J | |
| B\$,,,, | ·∞ | | |
| 48b List top three material arran Foreign country of interposed entity | | avment | |
| | B\$ | | ∼ × |
| | B\$ | | |
| | υ φ, | ┘└──┘╷└──┘╷└──┘╷└──┘ | |
| | | | |
| A | B \$, | | ∼ × |
| A A Amount of deductions denied | B\$ | Reason | . |
| C \$,,,, | ·, | | ⊡ •≫ |
| C \$,,,,, C \$,,, , ,, , ,, , ,, | ·,_ ·× ·× | | _ •≫ |
| C \$ | ·, | | _ •≫ |

| 49 | Did you or your international related parties restructure or replace an arrangement in the current |
|----|--|
| | or prior year which would have been subject to any of the hybrid mismatch rules if the arrangement |
| | was still in place? |

| | A | No Yes Provide the following information | | | | | |
|--|------|---|--|--|--|--|--|
| 49a | Pro | ovide the following information for the top three most material restructuring event(s) | | | | | |
| | | structuring event 1 | | | | | |
| | | Description | | | | | |
| | Α | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | As | a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid angement before the application of the hybrid mismatch rules? | | | | | |
| | _ | No Yes | | | | | |
| | Re | structuring event 2 | | | | | |
| | | Description | | | | | |
| | A | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | As | a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid | | | | | |
| | _ | angement before the application of the hybrid mismatch rules? | | | | | |
| | D | | | | | | |
| | | structuring event 3 | | | | | |
| | _ | Description | | | | | |
| | Α | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid angement before the application of the hybrid mismatch rules? | | | | | |
| | | No Yes | | | | | |
| | | | | | | | |
| 50 | _ | /ou answered yes at question 24, did you receive a foreign equity distribution that gave rise to a reign income tax deduction? | | | | | |
| | A | No Yes Provide the following information | | | | | |
| 50a Amount that is not non-assessable non-exempt under section 768-7 | | | | | | | |
| | B | | | | | | |
| | | ★ [_][]] | | | | | |
| 51 | lf y | you answered yes at question 24, did you derive branch hybrid mismatch income? | | | | | |
| | Α | No Yes Provide the following information | | | | | |
| 5 1 a | Δ١ | mounts that are not non-assessable non-exempt under subsection 23AH(4A) | | | | | |
| | | | | | | | |
| | D | ዏ└┘└┘ڕ└┘└┘ڕ└┘└┘┘ | | | | | |
| | | | | | | | |

Section H: Taxpayer's declaration

If the schedule is not lodged with the income tax return you are required to sign and date the schedule.

Important

Before making this declaration check to ensure that all the information required has been provided on this form and any attachments to this form, and that the information provided is true and correct in every detail. If you are in doubt about any aspect of the tax return, place all the facts before the ATO. The income tax law imposes heavy penalties for false or misleading statements.

Privacy

Taxation law authorises the ATO to collect information and disclose it to other government agencies. This includes personal information of the person authorised to sign the declaration. For information about your privacy go to **ato.gov.au/privacy**

Declaration:

I declare that the information on this form is true and correct.

Signature

| | | Day | M | onth | Year | | | |
|--|------|-----|-------|------|------|--|--|--|
| | Date | |] / [|]/ [| | | | |
| Contact name | | | | | | | | |
| | | | | | | | | |
| Daytime contact number (include area code) | | | | | | | | |
| | | | | | | | | |



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