Australian Government

Australian Taxation Office

International dealings schedule 2021

When completing this form

Place X in ALL applicable boxes.

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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
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C	D \$											•>>	E \$	
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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\$, , · × .
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	

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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																		
	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				
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<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

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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 \$

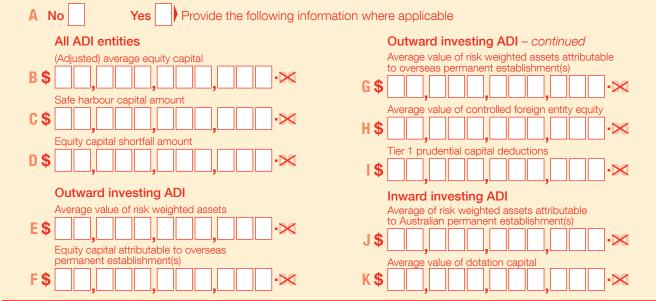
Transfer 3

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	

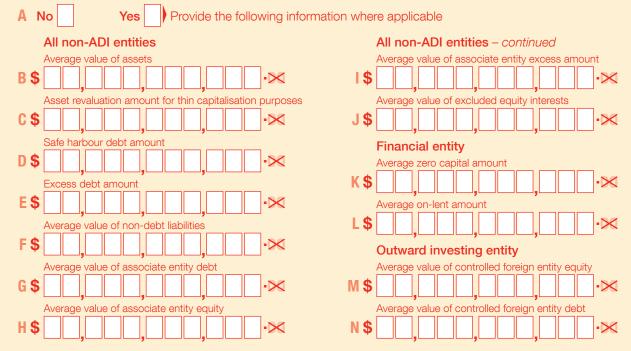
35 General information - to be completed by all thin capitalisation entities

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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