Australian Government

Australian Taxation Office

International dealings schedule

2015

WHEN COMPLETING THIS FORM

Place X in ALL applicable boxes.

Print clearly in BLOCK LETTERS using a black pen 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 2015*, available from our website at **ato.gov.au**

1 This schedule forms part of the tax return of:	
Tax file number	
Australian business number (ABN)	
Section A: International related party dealings	7334
2 is the total of your international related party dealings over \$2 million?	506
A No Go to question 17 Yes	IJ
3 Did you have dealings with international related parties, apart from the dealings with	
related parties located in specified countries?	
A No Provide the following information for the three countries with the highest dollar value of related party dealings.	
Foreign Activity country code Expenditure Revenue	
B C D\$, ,	·≫
	·×
I I I S I I I I I I I I I I I I I I I I	
IJ\$,,,,,K\$,,,,	⊡ •≫
N 0 P\$, , , , , , , , , , , , , , , , , ,	⊡ •≫
0 P\$, , ,	·×
0	⊡ •≫
All other amounts R \$	

4	Did you	u have dea	lings															ies?				
	A No	Ye	es	Provid the hi	ghest	dollar	value	e of re	atio	n for d pai	the ty c	three s lealing	speciti s.	ied C	Suntri	es w	Ith					
	pecified ountry	Activity code		Expendit	ture						-) (1		Reve			,					_
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		C	D \$, 💷		, 🗌],[·×	E \$		_,_		,			, 🗌		•≫
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5	Did voi	u have any	inter	natio		elated		rty d	eali	ings	inv	olvin	g tan	gibl	e pro	oper	ty of	a rev	venu	e na	ature	,
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8	Did you have any service arrangements with inte		tional related parties?
0-	A No Yes Provide the following information		
8a	Treasury related services Expenditure	8b	Management and administration services Expenditure
C \$		C \$;,,,,,
D \$		D \$	
υφ	Main pricing Percentage of dealings with	υφ	Main pricing Percentage of dealings with
E	methodology documentation code	Е	methodology documentation code
			Reinsurance
			Expenditure
C \$		C \$	
D \$		D \$	
	Main pricing Percentage of dealings with methodology documentation code		Main pricing Percentage of dealings with methodology documentation code
E		E	
8e	Research and development	8f	Sales and marketing services
C \$		C \$	
	Revenue		Revenue
D \$		D \$	┇└─└╷└─└╷└─└─╷└─└─╵╳─── ?╴════
	Main pricing Percentage of dealings with methodology documentation code		methodology documentation code
E	F	E	
8g	Software and information technology services Expenditure	8h	Technical services
C \$		C \$; □
D \$		D \$	
υψ	Main pricing Percentage of dealings with	υψ	Main pricing Percentage of dealings with
E	methodology documentation code	Е	methodology documentation code
8i		8j	Asset management
<u>с</u> ф		<u>с</u> ф	
C \$	Revenue	C \$	
D \$		D \$	
	Main pricing methodology Percentage of dealings with documentation code		Main pricing methodology Percentage of dealings with documentation code
E	F	E	F F
8k	Other services (specify in label H below) Expenditure		
C \$			
D \$			
	Main pricing methodology Percentage of dealings with documenta	ation o	code
E	F Description		
Н			
	Sensitive (v	when	n completed) Page 3

Sensitive (when completed)

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9	Did you have any derivative transactions with international related parties?
	A No Provide the following information
9a	Derivatives Percentage of dealings with Main pricing documentation
C \$	Expenditure Revenue et al. Second sec
9b	Principal derivative types
G1	Derivative code Derivative code Derivative code G2 G3
9c	Did you engage in the trading of derivatives globally through a trading structure in which
Н	you shared global profits from these activities with international related parties?
10	Did you enter into any debt factoring or securitisation arrangements with international related parties?
	A No Yes Provide the following information Percentage
10a	Debt factoring of dealings with Main pricing documentation
C \$	Book value Consideration methodology code
	Percentage
aur	Securitisation of dealings with Book value Consideration Main pricing methodology code
C \$	□ , □ □ , □ □ , □ □ ·× D \$ □ , □ □ , □ □ , □ □ ·× E □ F □
11	Did you have any dealings of a financial nature other than those listed 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 \$ <th< th=""></th<>
11b	Amounts loaned I \$,,, K \$,,
11c	Interest of dealings with Main pricing documentation
C \$	Expenditure Revenue methodology code
	Percentage
11d	Guarantees of dealings with Expenditure Revenue Revenue methodology code
C \$	□ , □ □ , □ □ , □ □ · ≫ D \$ □ , □ □ , □ □ , □ □ · ≫ E □ F □ F □
11e	Percentage of dealings with Main pricing
0.0	Main pricing documentation Expenditure Revenue
C \$	
11f	Reinsurance of dealings with Expenditure Revenue Revenue methodology code
C \$	
11a	Other financial dealings (specify in label H below)
	Expenditure Revenue documentation methodology code
C \$	
н	Description

12	Did you have any other international related party dealings of a revenue nature not reported at
	questions 5 to 11?
	A No Yes Provide the following information
	Other (specify in label H below) Percentage of dealings with Main pricing
0.0	Expenditure Revenue methodology code
C \$	└,└,└,└,└,└, └, └, └
Н	Description
10	Did you dispose of or acquire any tangible/intangible property of a non-revenue (capital) nature to or
13	from international related parties not reported at questions 5 to 11?
	A No Yes Provide the following information
13a	Percentage Tangible property Main capital of dealings with
	Consideration paid Consideration received asset pricing documentation methodology code
C \$	
13b	Percentage Intangible property Main capital of dealings with
	Consideration paid Consideration received methodology code
C \$	└,└└,└└,└└_,└── 𝔅 └,└└_,└└_,└└└── 𝔅 └ F └
	any of the following for a non-monetary payment to/from an international related party? services assets liabilities property – tangible or intangible (eg. intellectual property) processes
	 processes rights or obligations. A No Yes Provide the following information (where applicable) Capital Revenue Foreign country Nature of item Foreign country Nature of item
14a	A No Yes Provide the following information (where applicable)
	A No Provide the following information (where applicable) Capital Revenue Foreign country Nature of item Foreign country Nature of item
	A No Yes Provide the following information (where applicable) Revenue Capital Revenue Foreign country Nature of item Foreign country No payment B C D E Non-monetary payment B C D E C Did you provide or receive share-based employee remuneration to or from an international related party?
14b	A No Yes Provide the following information (where applicable) Capital Revenue Foreign country Nature of item Foreign country C D E Non-monetary payment B C C D D E D E
14b	A No Yes Provide the following information (where applicable) Revenue Capital Revenue Foreign country Nature of item Foreign country No payment B C D E Non-monetary payment B C D E C Did you provide or receive share-based employee remuneration to or from an international related party?
14b 15	A No Yes Provide the following information (where applicable) Revenue Capital Revenue Foreign country Nature of item D E Non-monetary payment B C Did you provide or receive share-based employee remuneration to or from an international related party? A No Yes Provide the following information for any international related party recharge amounts Did you provide or receive das part of those arrangements. Deductions Provide the following information for developing, producing or
14b 15	A No Yes Provide the following information (where applicable) <i>Capital Revenue</i> Foreign country Nature of item No payment B C D E Non-monetary payment B C D E D E
14b 15	A No Yes Provide the following information (where applicable) Revenue Capital Revenue Foreign country Nature of item D E Non-monetary payment B C Did you provide or receive share-based employee remuneration to or from an international related party? A No Yes Provide the following information for any international related party recharge amounts Did you provide or receive das part of those arrangements. Deductions Provide the following information for developing, producing or
14b 15	A No Yes Provide the following information (where applicable) <i>Capital Revenue</i> Foreign country Nature of item No payment B C D E Non-monetary payment B C D E D E
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14b 15	A No Yes Provide the following information (where applicable) <i>Capital Revenue</i> Foreign country Nature of item No payment B C D E Non-monetary payment B C D E D E

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17	Did a restructuring event(s) occur in the current year involving international related parties or your branch operations?
	A No Go to question 17b Yes
17a	Provide the following information for the three most material restructuring event(s) involving international related parties or your branch operations.
	Restructuring event 1 Percentage of dealings with
	Entity or branch Capital value Appendix 7 code Foreign country documentation code C D E G F
	Description
	H
	Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?
	No Yes
	Restructuring event 2 Percentage of dealings with
	Entity or branch Capital value Appendix 7 code Foreign country documentation code C D E G F D E G F F
	Description H
	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
	Entity or branch Capital value Appendix 7 code Foreign country documentation code C D D E G G Foreign Country F
	Description
	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 any branch operations (including Australian branch operations if you are a non-resident)? A No Yes Provide the following information
	Amounts claimed or returned for your internally recorded dealings with your branch operations
	18a Amounts borrowed 18b Amounts loaned
	Average balance I\$,,, I\$,,
	Interest free loans Average K \$,,, K \$,,, K \$,, K \$,, K \$,, K \$,,
180	Trading stock purchase costs Trading stock sales proceeds stock transfers I \$
180	Amounts claimed or returned for other
	internally recorded dealings Description of amounts claimed/returned
L	
	If you have more than one type of other internally recorded dealings show each type separately. That is, record an Amount claimed and/or an Amount returned, and a Description for each type of other internally
	recorded dealing. If you are lodging a paper return provide this additional information as an attachment to
	the Schedule.
_	
Se	ection B: Financial arrangements
19	Did you hold any financing arrangements during the income year where both of the following apply:
	 the arrangement was entered into with international related parties
	the characterisation between debt and equity is different under Division 974 of the Income Tax Assessment Act 1997 (ITAA 1997) (debt equity rules) from your treatment
	for accounting purposes.
	for accounting purposes. A No Yes Provide the following information Amounts received Average quarterly B C
	for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$,,, C \$,,, $\cdot \times$ Average quarterly balance of debt interests Average quarterly balance quarterly balance quarterly balance quarterl
	for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$,,, C \$,,,
20	for accounting purposes. A No Provide the following information Average quarterly balance of debt interests B \$ Average quarterly balance of equity D \$ Average quarterly balance of equity D \$ Average quarterly balance of equity D \$ Average quarterly balance of equity D \$ c \$ </th
20	for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$
20	for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$
20	for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$
20	for accounting purposes. A No Yes Provide the following information Amounts received Average quarterly balance of debt interests B\$ Average quarterly balance of equity D\$

<u> </u>						
Se	ection C: Intere	sts in fo	reign er	tities		
21	Did you have any inte	erests in co	ntrolled fore	ign companies	(CFCs) or contro	lled foreign trusts (CFTs)?
	A No Go to question	on 24				
	Yes Specify the n	umber of CFC			erest in at the end of	
	Number of CFCs and C	FTs E	Listed countries	Spe C	cified countries	Other unlisted countries
22	Specify the amounts Tax Assessment Act			able income u	nder the following	g sections of the <i>Income</i>
	Sec	ction 456 – C	FCs attributab	le income		
	Listed countries A\$		J,,,	 •∞		
	Specified countries B \$],,_	.		
	Other unlisted C\$],,	×		
	Total D \$.×-		
	. 🗖	ction 457 – C	FCs change of			
	E \$			<u> </u>		
	F \$			nd interposed A	istralian entities	
			······································			- h Ch
23	(as defined in section	n 47 <mark>A of th</mark> e	ITAA 1936),	either directly	or indirectly, to yo	
	any of your related e	ntities at an	ly time durin	g the income y	ear?	
	A No Yes					
24	Do you have foreign foreign trusts?	branch ope	rations or ar	ny direct or ind	irect interests in f	oreign companies or
	A No Go to question	on 27				
	Yes Specify the a	mount of forei	gn income you following sectic	derived that is ns of the ITAA 19	36 or ITAA 1997.	
			foreign branch			J – non-portfolio
		ome of Austr	alian compani	es		rom foreign companies
	Listed countries B],,_		B \$	
	Specified countries C \$],,	⊡ •≫	C \$,,,
	Other unlisted D\$],,_	.	D \$,	,,∞
			expenses incu on-assessable	irred in deriving		
	E \$],,	ו		
		ction 23AI – a	mounts paid		distribution	768-A – foreign equity s on minimum 10% participation foreign companies
	Listed countries B \$			⊡ .×	B\$	
	Specified countries C \$				C \$	
	Other unlisted D\$				D\$	
			اولالالاول		·	

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25	Did you have any debt deductions in earning non-assessable non-exempt foreign income (s25-90 or 230-15(3))?
	A No Yes Specify the total amount of debt deductions claimed under s25-90 or 230-15(3) ITAA 1997.
	Debt deductions in earning non-assessable non-exempt foreign income claimed under s25-90 or 230-15(3) B \$, , , , , , , , , , , , , , , , , ,
26	Did you have any capital gains tax (CGT) events in relation to your interest in a foreign company?
	A No Yes Specify the total amount of the capital gains/losses made in respect of interests in foreign companies and the amounts of any reductions made pursuant to subdivision 768-G of the ITAA 1997.
	Capital gain amounts B\$, , , , , , , , , , , , , , , , , ,
	Capital gain reductions C \$
	Capital loss amounts D \$
	Capital loss reductions E \$
27	During the last three income years (including the current income year) did you directly or indirectly transfer property, money or services to a non-resident trust, where that non-resident trust was still in
	existence during that income year?
	A No Yes Provide the following information for the three transfers with the highest dollar value.
	Transfer 1 B \$ Appendix 8 exemption code
	Transfer 2 B Image: Second s
	Transfer 3 B \square \square \square \square \square \square \square
28	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
29	Were you a partner in a foreign hybrid limited partnership (FHLP) or shareholder in a foreign hybrid company (FHC)?
	A No Provide the following information
	Number of FHLPs or FHCs you had an interest in B
	Total amount of your share of net income/profit C \$
Se	ection D: Thin capitalisation
30	Did the thin capitalisation rules affect you?
	A No Go to question 40 Yes
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 Yes Provide the ABN of the entity making that election, then go to question 40.
	A No Yes Provide the ABN of the entity making that election, then go to question 40. Australian business number (ABN) B <td< th=""></td<>
32	What was your entity type at the end of the income year?
32	What was your entity type at the end of the income year? A Code

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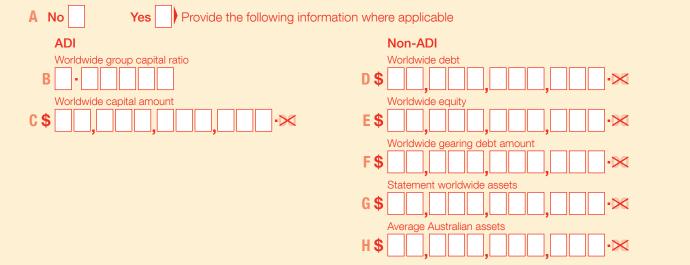
Г	
34	What method did you use to calculate your average values? A Code
35	General information – to be completed by all thin capitalisation entities
	Debt deductions
	Debt deductions on debt from related non-residents B \$
	Amount of debt deduction C \$
	Adjusted average debt D \$,,,,
36	Were you an authorised deposit taking institution (ADI) for the income year? Answer 'Yes' if you entered code 7 or 8 at Question 32 label A.
	A No Provide the following information where applicable
	All ADI entities Outward investing ADI – continued (Adjusted) average equity capital Average value of risk weighted assets attributable
	Adjusted) average equity capital Average value of risk weighted assets attributable to overseas permanent establishment(s)
	C \$,,,,, M S S S S S S S S S S S S S S S S S S
	D\$
	Outward investing ADI Auroration of the leader of the lea
	Average value of risk weighted assets Average of risk weighted assets attributable to Australian permanent establishment(s)
	Equity capital attributable to overseas permanent establishment(s)
	F\$,,,,,,,,,_
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.
	A No Yes Provide the following information where applicable
	All non-ADI entities All non-ADI entities – continued
	Average value of assets Average value of associate entity excess amount
	Asset revaluation amount for thin capitalisation purposes Average value of excluded equity interests C \$ J -> J -> -> > <t< th=""></t<>
	Safe harbour debt amount
	D\$,, Average zero capital amount K\$
	E \$,,,, Average on-lent amount
	Average value of non-debt liabilities L\$,,,
	Average value of associate entity debt Average value of controlled foreign entity equity
	G \$,<
	H \$,,,,,,,
38	Did you rely on arm's length tests?
	A No Provide your arm's length debt (non-ADI) or capital (ADI) amount
	B\$

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Sensitive (when completed)

39 Did you rely on worldwide gearing debt/capital tests?

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Section E: Financial Services Entities

40	Are you a foreign bank or other qualifying financial entity that
	has not elected out of Part IIIB of the ITAA 1936?
	A No Yes Provide the following information
	Average quarterly notional amount taken to be borrowed under section 160ZZZ
	B\$,,,,
	Notional amount of interest taken to be paid under section 160ZZZA
	(excluding amounts attributable to OB activities of offshore banking units (OBUs))
	Notional amount of interest taken to be paid under section 160ZZZA attributable to OB activities of OBUs
	Amount of section 160ZZZJ withholding tax paid on notional interest amount
	E\$,,,,,,,,,_

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

A No Yes Provide the following informatio	n					
41a Borrowing	41b Lending					
Assessable OB income	Assessable OB income					
B\$,,,,,	B\$,,,×					
Net OB income/loss	Net OB income/loss					
C \$,,,,,						
Assessable OB income from related parties	Assessable OB income from related parties					
D \$,,,	D\$,,,,					
41c Guarantee-type 41d Trading						
Assessable OB income	Assessable OB income					
B \$,,,,	B\$,,,,,					
Net OB income/loss	Net OB income/loss					
C \$, , ,	C \$,,, × /					
Assessable OB income from related parties	Assessable OB income from related parties					
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 Assessable OB income	41f	Investment Assessable OB income
B \$		B \$	
C \$		C \$	
D \$	Assessable OB income from related parties	D \$	Assessable OB income from related parties
41g	Advisory	41h	Hedging
B \$		B \$	
C \$		C \$	
D \$		D \$	Assessable OB income from related parties
41i	Other – as declared by regulation Assessable OB income		General OB deduction and apportionable OB deductions
B \$		C \$	· , ,
C \$			
D \$	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
B \$	Assessable OB income	E \$	
C \$	Net OB income/loss		
D \$			

Section F: Mis	cellaneous
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42	Did you have a Conduit Foreign Income balance and/or distribute amounts of Conduit Foreign Income during the income year?					
	A No Provide the following information					
	Balance of conduit foreign income					
	B\$,,,					
	Conduit foreign income distributed during income year					
	C \$,,, ×					
43	3 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 Yes Provide the following information					
	Interest paid to financial institution exempt					
	from withholding under a DTA DTA country					
	B\$,,,, C					
	Section 128F exempt interest paid					
	D\$,,,					
	Section 128FA exempt interest paid					

Section G: 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		Month	Year
	Da		/		
Contact name					
Daytime contact number (include area code)					



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