



Local file/master file 2017

An in-depth description and explanation of the information requirements of the local file master file for 2017.

Last updated 8 April 2021

Local file



Information and requirements of the local file.

Master file



The master file can be provided as an attachment as part of your lodgment of the local file or as a separate lodgment.

Detailed design



Find out more about lodgment, attachments and message structure.

Appendixes – local file and master file



Glossary, transaction categories, TP method / CAP method, TP documentation codes / STPRK options, and exclusion list.

Local file

Information and requirements of the local file.

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Overview

The local file comprises two tiers as outlined in [Table 1](#). The amount of information required for a particular tier reflects the entity's business operations, complexity and perceived level of risk.

Reference is made to two lists:

1. [Short form exceptions list](#) – details specific types of transactions that if engaged in by the reporting entity, will mean it will not be eligible to complete the short form local file.
2. [Exclusions list](#) – only relevant for those entities lodging a local file, and identifies transactions that are not material controlled transactions for the purposes of Part B of the local file.

Table 1: Local file tiers

File type	Criteria
Short form local file	<p>The reporting entity is only required to provide the short form local file to us if it meets at least one of the following criteria:</p> <ul style="list-style-type: none">• the aggregate value of its international related party dealings (IRPDs) is less than A\$2 million and it has no international related party dealings (IRPDs) on the short form exceptions list• the simplified transfer pricing record keeping (STPRK) criteria for small taxpayers and it has

	no IRPDs on the short form exceptions list the STPRK criteria for materiality and it has no IRPDs on the short form exceptions list.
Local file	Where the reporting entity doesn't meet the criteria for the short form local file, it will be required to complete the local file (which includes the short form local file).

[Table 2](#) provides an overview of the information requirements of the two tiers of the local file.

Table 2: Information requirements overview

File type	Information content
Short form local file	<p>Reporting entity description:</p> <ul style="list-style-type: none"> • a description and copy of the organisational structure of the reporting entity, including a description of the individuals to whom local management reports and the countries in which such individuals maintain their principal offices • a description of the reporting entity's business and strategy • a description of any business restructures affecting the reporting entity in the current or previous income year, and an explanation of its significance • a description of any transfers of intangibles in the current or previous income year, and an explanation of its significance • a list of key competitors of the reporting entity. <p>Refer to the Local file – short form instructions for more information.</p>
Local file	<p>The local file consists of the information in the short form local file, plus controlled transactions and financial information.</p> <p>Controlled transactions – Part A</p>

The following information for all controlled transactions for the income year:

- Australian counterparty tax file number (TFN) or Australian business number (ABN)
- name of the non-resident counterparty
- country of tax residence of the non-resident counterparty
- transaction category
- amounts of consideration payable/receivable (of a capital nature for Australian income tax purposes)
- amounts of expenditure/revenue (not of a capital nature for Australian income tax purposes)
- for international related party (IRP) debt factoring and securitisation arrangements, the book value of transferred debts
- where foreign currency gains or losses are incurred for the transaction, disclosure of the FX gains or losses
- the transfer pricing method or capital asset pricing methodology relied on for the transaction
- the transfer pricing documentation code/STPRK for the purposes of Part B, whether the transaction is covered by a category on the [exclusions list](#).

Note:

- In the case of an agreement included in a relevant agreement series (RAS), all the agreements covered by the RAS are aggregated for the purpose of completing Part A.
- Zero values are shown for nil payment or consideration (as per item 14a of the international dealings schedule (IDS)).
- There is an indicator for non-monetary consideration (as per item 14b of the IDS).

Material controlled transactions – Part B

For each transaction not covered by the exclusions list (material-controlled transactions):

- the transfer pricing method relied on for the transaction by the IRP (or an indication the reporting entity was not able to obtain the information)
- an indication whether there is a written agreement and, if so, whether the agreement has been previously provided to us (where it has been previously provided, we will require the title of the agreement to enable ATO identification)
- a copy of the agreement (unless previously provided to us)
- any foreign APAs or rulings provided by another jurisdiction in relation to an agreement (unless previously provided to us).

Note: There are special rules for providing agreements included in a RAS, see **Local file – Part B: Guidance on providing International Related Party agreements**

Financial information

Highest quality financial accounts for the Australian reporting entity.

What is an IRP and IRPD?

For the purposes of the local file, we are adopting the definitions of International related parties (IRP) and International related party dealings (IRPD) as used in the international dealings schedule (IDS).

IRPs are persons who are not dealing wholly independently with one another in their commercial or financial relations and whose dealings or relations can be subject to Subdivision 815-B of the *Income Tax Assessment Act 1997* (ITAA 1997) or the associated enterprises article of a relevant double tax agreement (DTA).

There cannot be a transfer pricing benefit under subsection 815-120(1) or pursuant to Article 9 of a relevant tax treaty if the conditions of a relevant entity's commercial or financial dealings are inherently not

capable of affecting the amount of the entity's taxable income, losses, tax offsets or withholding tax under Australian income tax law.

Whether the conditions of an entity's commercial or financial dealings with the entity's offshore subsidiary in the course of the entity's business operations carried on, at or through the entity's offshore permanent establishment (PE) would be capable of affecting the entity's taxable income, losses, offsets or withholding tax under Australian income tax law would depend on all the relevant facts and circumstances, including the nature and duration of the relevant dealing.

Duplication (administrative solution)

If a reporting entity chooses to voluntarily lodge Part A of their local file at the same time as their tax return, they will not need to complete the relevant IRPD labels in Questions 2 to 17 of the IDS. Part B of the local file must be lodged by the statutory due date (per 815-355(2) of the (ITAA 1997).

If the reporting entity has already provided relevant agreements to us, they do not need to provide the agreements to us again through the local file. The XML schema for Part B of the local file includes a provision for notifying us if an agreement has already been provided.

Short form exceptions list

Where the reporting entity has the IRP transactions or dealings of the kinds listed below, they are not eligible for the short form local file, since a low value for these transactions is not necessarily reflective of the level of risk:

- Any derivative including without limitation any swap, forward, future or option in respect of values determined in connection with interest rates, currency, commodities or other assets.
- Any legal or equitable assignment of trademark, patent, design, copyright, other intellectual property or similar property or rights, or any part thereof.
- Any licence or other grant of use or right to use a trademark, patent, design, copyright, other intellectual property, secret formula or process or similar property or rights.
- IRPDs of a capital nature.

Exclusions list

The exclusions list outlines categories of agreements which are considered to not materially affect the application of Subdivision 815-B of the ITAA 1997, or where agreements are not otherwise required. Part B of the local file is not required for the following agreements.

Agreements relating to transactions eligible for Simplified transfer pricing record keeping

Agreements covered by the following STPRK options you have chosen to apply the:

- intra-group services STPRK option
- management and administration services STPRK option
- technical services STPRK option
- low-level inbound loans STPRK option
- low-level outbound loans STPRK option.

For avoidance of doubt, in applying the criteria in this exclusion list we confirm IRPD transactions involving recharge or reimbursement of costs are also categorised by what is obtained or provided under the IRPD in exchange for the recharged or reimbursed amounts.

For example:

- An IRPD recharge or reimbursement arrangement involving 'reimbursement' of your costs for insurance you provide to your IRP is treated as an **Insurance transaction**.
- An IRPD recharge or reimbursement arrangement involving 'recharge' of your IRP's costs for services provided by the IRP to you in connection with the IRP organising or managing your third party insurance contracts is treated as an **Insurance Services transaction**.

Reimbursement under employee secondment agreements

To be excluded, the agreement must satisfy the following criteria:

- the agreement solely covers
 - reimbursement of salary or other costs in connection with secondment of natural persons

- rights and obligations in connection with effecting the employment or engagement of the natural persons by the party obtaining the seconded employee.
- the persons who are employed do not perform services for more than one party to the agreement at the same time
- the business operations of the party providing the seconded employee do not include providing consultancy services, personnel services or staff engagement services to unrelated parties.

Low value or low risk service agreements

To be excluded, the agreement must satisfy the following criteria:

- the agreement solely covers
 - the provision or receipt of services
 - rights and obligations in connection with effecting the provision or receipt of services
- the services are not provided in connection with use or enjoyment of any trademark, patent, design, copyright, other intellectual property, secret formula or process or similar property rights
- the services are not provided in connection with any other IRP agreement
- the total amount deducted in the income year in connection with the agreement or Relevant agreement series (as applicable) is less than either
 - A\$2 million
 - 2% of IRPD expenses
- the total amount returned in the income year in connection with the agreement or Relevant Agreement Series (as applicable) is less than either
 - A\$2 million
 - 2% of IRPD revenue.

Low value or low risk sale and purchase tangible trading stock agreements

To be excluded, the agreement must satisfy the following criteria:

- the agreement solely covers either
 - the sale or purchase of tangible trading stock
 - rights and obligations in connection with effecting the sale or purchase of tangible trading stock
- the tangible trading stock provided or received, is not provided or received in connection with use or enjoyment of any trademark, patent, design, copyright, other intellectual property, secret formula or process or similar property rights
- the tangible trading stock is not provided or received in connection with any other IRP agreement
- the total amount deducted in the income year in connection with the agreement or Relevant Agreement Series (as applicable) is less than either
 - A\$2 million
 - 2% of IRPD expenses
- the total amount returned in the income year in connection with the agreement or Relevant Agreement Series (as applicable) is less than either
 - A\$2 million
 - 2% of IRPD revenue.

Issue of ordinary shares

To be excluded, the agreement must satisfy the following criteria:

- the agreement solely covers
 - acquisition by the reporting entity of ordinary shares, by way of issue of new shares by the company
 - issue of ordinary shares by a reporting entity which is a company.

Additional information

Refer to the following for more information on the local file:

- Local file instructions 2017

- Local file – Part B: Guidance on providing International Related Party agreements

QC 54776

Master file

The master file can be provided as an attachment as part of your lodgment of the local file or as a separate lodgment.

Last updated 8 April 2021

The specific information that must be included in the master file is as described in Annex I of the [Final Report](#) [↗](#).

QC 54776

Detailed design

Find out more about lodgment, attachments and message structure.

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Overview

We have developed a local file and master file XML schema (LCMSF) and associated validation rules to enable reporting entities to submit their local file and master file to us.

The design of the LCMSF allows for the local file's three components and the master file to be submitted independently of each other. The LCMSF also contains a country-by-country (CBC) reporting notification section, however, the CBC report itself must be lodged separately in accordance with the [OECD XML schema](#) .

The 2017 local file and master file XML schema comprises the following sections:


- [statement information](#) for basic information relating to the statement being submitted
- [intermediary information](#) relating to an intermediary lodging on your behalf
- [entity information](#) about the reporting entity, and (where applicable) the global parent entity (if they are different entities)
- [statement lodgment criteria](#) with details on the contents of the lodgment (for example which statements are included)
- [local file](#) including the [short form](#), [Part A](#) and [Part B](#) of the local file
- [declarations](#) that are standard for the intermediary and the reporting entity.

You should also refer to the [Appendixes](#) for various relevant codes used for reporting as part of the lodgment.

Electronic lodgment

How to lodge

CBC statements (the CBC report, master file and local file) must be lodged through one of the following ATO approved channels:

- Online services for business/ Online services for agents using the File Transfer Facility (not by mail message)
- [Standard Business Reporting](#)  (SBR) using SBR-enabled software.

CBC statements must be submitted through the above channels using a validly generated XML file. This XML file is generated by your

business management software (for example, tax reporting or accounting software) using the ATO provided XML schema. Additionally, the XML file must adhere to our validation rules and other technical requirements.

You may need to make enquires with your software provider as to whether they support lodging CBC reporting statements to us.

Lodgments by email or paper will **not** be accepted.

For more information on electronic lodgment, visit our [Online services](#) page. For more information on the XML schema, validation rules and other technical documentation, visit our [Significant Global Entity Obligation](#) [↗](#) (SGEO) page on the [SBR website](#) [↗](#) and the [CBC software developers](#) [↗](#) site.

Attachments

General information

There is a maximum of 500 attachments per lodgment, where the size of any single attachment cannot exceed 20Mb.

Table 3 lists the supported attachment formats that can be embedded within the XML file (using BASE64 encoding). Attachments cannot contain active content, for example, macros, JavaScript, etc.

Table 3: Supported attachment types / formats

File Extension	File type
DOC	Microsoft Word Binary File Format
DOCX	Office Open XML
XLS	Excel Binary File Format
XLSX	Office Open XML
PDF	Portable Document Format

ODT	OpenDocument Text
ODS	OpenDocument Spreadsheet

Naming convention

To facilitate the provision of attachments, the following naming convention for attachments must be used:

<Reporting Year>_<Statement Type>_<Transaction ID>_<Version>_<Name>.<ext>.

Where *<Reporting Year>* is mandatory and in the form of 'YYYY'.

Where *<Statement Type>* is mandatory and must be one of the following values:

- 'MSTR' for master file
- 'LFSF' for local file – short form
- 'LFPBI' for IRP agreement
- 'LFPBA' for Advance Pricing Arrangement
- 'LFPBR' for Ruling
- 'LFPBF' for financial accounts
- 'LFPBO' for other.

If the *<Statement Type>* is 'LFPBI', 'LFPBA' or 'LFPBR' the *<Transaction ID>* element is mandatory.

<Version> is mandatory and must be one of the following values:

- 'A' for amended
- 'O' for original.

<Name> is mandatory and can be chosen by the reporting entity.

<ext> is mandatory and can only be one of those listed in the [Attachment types](#) section below.

The filename cannot exceed 255 characters. This filename is reflected within the XML file.


Duplicate attachments

Where an IRP agreement relates to multiple transactions, it needs to be provided only once (for example, for the first transaction that relates to that agreement). Where a transaction is reported in relation to that IRP agreement, at LCMSF54, the filename of the IRP agreement (following the naming convention above) must be provided.

In the case of amended IRP agreements, the above also applies, with the exception that the filename (following the naming convention above) must be provided at LCMSF132.

Where an APA or ruling relates to multiple transactions, the APA or ruling needs to only be provided once (for example, for the first transaction that relates to that APA/ruling).

Message structure table

The following tables provide an overview of the 2017 LCMSF. The question IDs relate to the associated elements provided in the [message structure table](#)  (MST) provided to digital service providers.

Statement information

This section must always be completed for every submission.

Table 4: Statement information

Question	Question ID	Valid values	Comments
Amendment	LCMSF1	True/False	Mandatory question Indicates whether this lodgment is an amendment to a previous lodgment Amended lodgments do not include those where additional statements (or

			parts thereof) that are being provided for the first time
Reporting period start date	LCMSF142	YYYY- MM-DD	Mandatory question The start date of the tax year of the reporting entity
Reporting period end date	LCMSF143	YYYY- MM-DD	Mandatory question The end date of the tax year of the reporting entity

Intermediary information

This section is only required if the form is submitted by an intermediary (for example, their tax agent) on behalf of the reporting entity.

Table 5: Intermediary information

Question	Question ID	Valid values	Comments
Intermediary ABN	LCMSF2	ABN	Must be a valid ABN
Intermediary name	LCMSF3	Name of the intermediary	Maximum of 200 characters
Intermediary email	LCMSF4	Email address	Maximum of 200 characters
Intermediary phone	LCMSF5	Mobile or landline	Maximum of 16 characters

Tax agent number (TAN)	LCMSF6	TAN	Must be a valid TAN
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Entity information

Reporting entity information

Table 6: Reporting entity information


Question	Question ID	Valid values	Comments
Reporting entity ABN	LCMSF7	ABN	Either an ABN or TFN is required
Reporting entity TFN	LCMSF65	TFN	Either an ABN or TFN is required
Reporting entity name	LCMSF8	Legal name of the entity	Mandatory question Maximum of 200 characters
Reporting entity email	LCMSF21	Email address	Mandatory question Maximum of 200 characters
Reporting entity phone	LCMSF22	Mobile or landline	Mandatory question Maximum of 16 characters
Is the reporting entity the head entity of a tax	LCMSF15	True/False	Mandatory question

consolidated group?			
Is the reporting entity the provisional head entity of a Multiple entry consolidated (MEC) group?	LCMSF16	True/False	Mandatory question
Are there other Australian resident taxpayers in your accounting group (but not in your tax consolidated group)?	LCMSF17	True/False	Mandatory question
Is the reporting entity an Offshore banking unit (OBU)?	LCMSF61	True/False	Mandatory question

Global parent entity information

Table 7: Global parent entity information

Question	Question ID	Valid values	Comments
Are you a global	LCMSF66	True/False	Mandatory question

parent entity?			If True, go to Statement lodgment criteria section
Global parent entity name	LCMSF11	Legal name of the entity	Maximum of 200 characters
Global parent entity tax jurisdiction	LCMSF12	Country code 	If the Country code is 'AU' (Australia), either an ABN or TFN is required
Global parent entity ABN	LCMSF9	ABN	If the Country code is 'AU' (Australia), either an ABN or TFN is required
Global parent entity TFN	LCMSF10	TFN	If the Country code is 'AU' (Australia), either an ABN or TFN is required

Statement lodgment criteria

Local file

Table 8: Local file lodgment criteria

Question	Question ID	Valid values	Comments
Will this submission include details on your lodgment of the local file?	LCMSF137	True/False	Mandatory question If False, go to Master file section

Has the Commissioner of Taxation, by notice in writing, exempted you from providing the local file for this reporting period?	LCMSF117	True/False	If True, go to Master file section
Are you lodging any part of the local file in this submission?	LCMSF118	True/False	If False, go to Master file section
Which parts of the local file are you lodging in this submission?	LCMSF119	Local file – short form, Local file – Part A, Local file – Part B	Multiple values can be selected, which form the component parts of the Local File
Is your lodgment of Part A of the local file part of the Administrative solution?	LCMSF68	True/False	Administrative solution
Have you been granted a replacement reporting period for the local file?	LCMSF120	True/False	If True, replacement reporting period dates must be provided

Replacement reporting period start date	LCMSF13	YYYY-MM-DD	The start date of the replacement reporting period
Replacement reporting period end date	LCMSF14	YYYY-MM-DD	The end date of the replacement reporting period

Local file – short form

Table 9: Local file – short form lodgment criteria

Question	Question ID	Valid values	Comments
Did you engage in IRP transactions or dealings listed on the short form exceptions list for the reporting period?	LCMSF27	True/False	Mandatory question If True go to the Master file section
Did you have less than \$2m in aggregate IRPDs for the reporting period?	LCMSF28	True/False	What is an IRP and IRPD?
Did you meet the criteria for the Small taxpayers STPRK option for the	LCMSF29	True/False	Small taxpayers STPRK option


reporting period?			
Did you meet the criteria for the Materiality STPRK option for the reporting period?	LCMSF30	True/False	Materiality STPRK option

Master file

Table 10: Master file lodgment criteria

Question	Question ID	Valid values	Comments
Will this submission include details on your lodgment of the master file?	LCMSF138	True/False	Mandatory question If False, go to CBC report section
Has the Commissioner, by notice in writing, exempted you from providing the master file for this reporting period?	LCMSF81	True/False	If True, go to CBC report section
Are you lodging the master file as part of this submission?	LCMSF75	True/False	Select False if the master file will be lodged by another entity on

			your behalf or if you are applying the transitional relief
Have you been granted a replacement reporting period for the master file?	LCMSF121	True/False	Mandatory question If True, replacement reporting period dates must be provided
Replacement reporting period start date	LCMSF122	YYYY- MM-DD	The start date of the replacement reporting period
Replacement reporting period end date	LCMSF123	YYYY- MM-DD	The end date of the replacement reporting period
Is your lodgment of the master file also on behalf of other entities in your Australian accounting group?	LCMSF76	True/False	If True, a valid ABN or TFN must be provided
ABNs of the entities	LCMSF77	ABN	Valid ABNs
TFNs of the entities	LCMSF78	TFN	Valid TFNs

Please confirm that you have attached the master file	LCMSF124	True/False	The master file should meet the information requirements as outlined in Annex I of the OECD Guidance 
Will another entity in your Australian accounting group be lodging the master file (on your behalf)?	LCMSF79	True/False	If True, a valid ABN or TFN must be provided
ABN of the entity	LCMSF19	ABN	A valid ABN
TFN of the entity	LCMSF20	TFN	A valid TFN
Is any foreign entity in your global accounting group required to prepare or file a master file in another country by the time your master file is due for lodgment in Australia?	LCMSF93	True/False	LCMSF93 must be False and LCMSF108 must be True to take advantage of the transitional relief in relation to the Master file for the first reporting period
Do you commit to provide (or	LCMSF108	True/False	LCMSF93 must be False and

ensuring another entity in your Australian accounting group provides) the master file for the second reporting period starting on or after 1 January 2017?			LCMSF108 must be True to take advantage of the transitional relief in relation to the Master file for the first reporting period
On the basis of your circumstances and commitment to filing the master file for the second reporting period, the Commissioner will not require the master file for the first reporting period. Please provide the entity's ABNs to be covered by this concession	LCMSF109	ABN/TFN	Valid ABNs.
On the basis of your circumstances and commitment to filing the master file for the second	LCMSF110	ABN/TFN	Valid TFNs.

reporting period, the Commissioner will not require the master file for the first reporting period. Please provide the entity's TFNs to be covered by this concession			
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CBC report

Table 11: CBC report lodgment criteria

Question	Question ID	Valid values	Comments
Will this submission include details on your lodgment of the CBC report?	LCMSF139	True/False	Mandatory question If False, go to Local file section.
Has the Commissioner, by notice in writing, exempted you from providing the CBC report for this reporting period?	LCMSF69	True/False	If True, a valid ABN or TFN must be provided
ABNs of the entities	LCMSF111	ABN	Valid ABNs

TFNs of the entities	LCMSF112	TFN	Valid TFNs
Have you been granted a replacement reporting period for the CBC report?	LCMSF125	True/False	If True, replacement reporting period dates must be provided
Replacement reporting period start date	LCMSF126	YYYY-MM-DD	The start date of the replacement reporting period
Replacement reporting period end date	LCMSF127	YYYY-MM-DD	The end date of the replacement reporting period
Is the lodgment of the CBC report also on behalf of other entities in your Australian accounting group?	LCMSF114	True/False	If True, ABN or TFN must be provided
ABNs of the entities	LCMSF115	ABN	Valid ABNs
TFNs of the entities	LCMSF116	TFN	Valid TFNs
Has / will an entity in your global accounting group file a	LCMSF70	True/False	If True, name and tax jurisdiction must be provided

CBC report in another jurisdiction for this reporting period where that report will be automatically exchanged with Australia?			
What is the name of the entity?	LCMSF71	Legal name of the entity	Maximum of 200 characters
What is the tax jurisdiction of the entity?	LCMSF74	Country code	na
Will another entity in your Australian accounting group be lodging the CBC report for this reporting period (on your behalf)?	LCMSF26	True/False	If True, a valid ABN or TFN must be provided
ABN of the entity	LCMSF72	ABN	A valid ABN
TFN of the entity	LCMSF73	TFN	A valid TFN
Are you filing the CBC report as a surrogate parent entity with the filing	LCMSF140	True/False	na

intended to meet a CBC reporting obligation in other jurisdictions?			
Please confirm that you will be lodging a CBC report for this reporting period	LCMSF141	True/False	The CBC report must be lodged separately in accordance with the OECD XML schema 

Local file

Local file – short form

This section is required if you have selected that you will be providing the local file – short form as part of this submission at LCMSF119 (in the [statement lodgment criteria](#) section).

Table 12: Local file – short form


Question	Question ID	Valid values	Comments
Please confirm that you have attached the local file – short form	LCMSF82	True/False	Required if LCMSF119 indicates that the short form is being lodged

Local file – Part A

This section is required if you have selected that you will be providing the local file – Part A as part of this submission at LCMSF119 (in the [Statement lodgment criteria](#) section).

Table 13: Local file – Part A

Question	Question ID	Valid values	Comments
Local file – Part A Transaction Identifier	LCMSF31	Number	Mandatory question Increment number each transaction that is a link Part B related agreement APA/rule
Transaction type	LCMSF32	Transaction category	Mandatory question See Appendix
Is this transaction part of a Relevant Agreement Series (RAS) as defined?	LCMSF33	True/False	Mandatory question See Local Part B: Guidance provided Internal Related agreement
How many transactions are part of the Relevant Agreement Series?	LCMSF35	Low / Moderate / High	Low = 1 Moderate = 50 High = 51 or more
ABN of the Australian	LCMSF83	ABN	Either a ABN or require

counterparty to the transaction			
TFN of the Australian counterparty to the transaction	LCMSF84	TFN	Either a ABN or require
Name of the non-resident counterparty/ies to the transaction	LCMSF37	Legal name of the entity	Mandat questio Maximu 200 ch:
Tax residence of non-resident counterparty/ies to the transaction	LCMSF38	Country code 	Mandat questio
Amount of consideration paid (of a capital nature for income tax purposes) for the transaction	LCMSF39	\$XX,XXX,XXX,XXX	Mandat questio
Amount of consideration received (of a capital nature for income tax purposes) for the transaction	LCMSF40	\$XX,XXX,XXX,XXX	Mandat questio
Was non-monetary consideration provided (of a capital nature for income tax	LCMSF85	True/False	Mandat questio

purposes) for the transaction?			
Was non-monetary consideration obtained (of a capital nature for income tax purposes) for the transaction?	LCMSF86	True/False	Mandat questio
Amount of expenditure (not of a capital nature for income tax purposes) for the transaction	LCMSF41	\$XX,XXX,XXX,XXX	Mandat questio
Amount of revenue (not of a capital nature for income tax purposes) for the transaction	LCMSF42	\$XX,XXX,XXX,XXX	Mandat questio
Was non-monetary consideration provided (not of a capital nature for income tax purposes) for the transaction	LCMSF44	True/False	Mandat questio
Was non-monetary consideration obtained (not of a capital nature for income tax	LCMSF45	True/False	Mandat questio

purposes) for the transaction			
Amount of foreign exchange losses deducted for the transaction	LCMSF87	\$XX,XXX,XXX,XXX	Mandat questio
Amount of foreign exchange gains returned for the transaction	LCMSF43	\$XX,XXX,XXX,XXX	Mandat questio
What transfer pricing / capital asset pricing methodology has been applied to this transaction?	LCMSF46	TP method / CAP method	Mandat questio See Appenc
What level of transfer pricing documentation has been prepared for this transaction?	LCMSF47	TP Documentation codes / STPRK Options	Mandat questio Both TP Docum Codes STPRK can be provide See Appenc
Has the special short-term tenor rule for ordinary borrowings and ordinary loans been applied to	LCMSF88	True/False	Mandat questio

this transaction?			
Has the special short-term tenor rule for short term derivatives been applied to this transaction?	LCMSF128	True/False	Mandat questio
Has the special short-term tenor rule for FX derivatives been applied to this transaction?	LCMSF129	True/False	Mandat questio
Is this transaction an OB Activity?	LCMSF63	True/False	n/a
Is this transaction covered by a category on the exclusions list?	LCMSF48	True/False	Mandat questio
What category of the exclusion list applies to this transaction?	LCMSF49	Exclusion list category	See Append

Local file – Part B

This section is required if you have selected that you will be providing the local file – Part B as part of this submission at LCMSF119 (in the [statement lodgment criteria](#) section).

For more information on providing IRP agreements in the local file – Part B see: Local file – Part B: Guidance on providing International

Related Party agreements.

Table 14: Local file – Part B

Question	Question ID	Valid values	Comments
Local file – Part A Transaction Identifier	LCMSF50	Number	Mandatory question Incrementing number for each transaction that is used to link Part A , Part B and the related IRP agreement and APA / ruling
Which transfer pricing / capital asset methodology has the IRP relied upon for this transaction?	LCMSF51	TP method / CAP method	Mandatory question See Appendix C
Is the Reporting Entity not able to obtain information from the IRP for the transfer pricing methodology the IRP relied upon for this transaction?	LCMSF130	True/False	Required if LCMSF51 is 'Unknown (TP Method)' or 'Unknown (CAP Method)'

Is there a written agreement or other relevant documentation evidencing the terms of the agreement covering this transaction (as reported in Part A)?	LCMSF52	True/False	Mandatory question
Is the Reporting Entity able to obtain from any of the related counterparties, the written agreement or other relevant documentation evidencing the terms of the agreement covering the transaction (as reported at Part A)?	LCMSF64	True/False	Required if LCMSF52 is False
Has this written agreement been previously provided to the ATO?	LCMSF53	True/False	<p>Required if LCMSF52 or LCMSF64 is True</p> <p>Where an agreement relates to multiple transactions, the agreement only needs to be</p>

			<p>provided once</p> <p>Where a subsequent transaction has the same agreement as another (which has already been provided) in this submission then this should be answered True</p>
Please confirm that you have attached the agreement(s) for this transaction	LCMSF89	True/False	Required if LCMSF53 is False
Title of the agreement previously provided to the ATO	LCMSF54	Title of the IRP Agreement	<p>Required if LCMSF53 is True</p> <p>In cases where the agreement has been previously provided in the same submission but for a different transaction, please provide the Document ID in this field.</p>
What is the year in which	LCMSF90	YYYY	Required if LCMSF53 is True

the agreement was previously provided to the ATO?			In cases where the agreement has been previously provided in the same submission but for a different transaction, please provide the <Reporting Year> as used in the filename for the agreement
Since providing the written agreement to the ATO, has the agreement been amended?	LCMSF91	True/False	Required if LCMSF53 is True
Have the amended agreements or agreements incorporating the amendments been provided to the ATO?	LCMSF92	True/False	Required if LCMSF91 is True
Please confirm that you have attached the amendments for previously provided agreements for	LCMSF131	True/False	Required if LCMSF92 is False

this transaction			
What is the title of the amendment agreements or agreement incorporating the amendments previously provided to the ATO?	LCMSF132	Title of the IRP Agreement (amendment)	Required if LCMSF92 is True
What is the year in which the amendment agreements or agreements incorporating the amendments was previously provided to the ATO?	LCMSF133	YYYY	Required if LCMSF92 is True
Are there APAs or rulings provided by other jurisdictions for this transaction?	LCMSF106	True/False	Mandatory question
Has the Reporting Entity previously provided these APAs or rulings to the ATO?	LCMSF134	True/False	Required if LCMSF106 is True

Please confirm that you have attached the relevant APAs or rulings for this transaction	LCMSF135	True/False	Required if LCMSF134 is False
What is the year in which the Reporting Entity previously provided these APAs or rulings?	LCMSF136	YYYY	Required if LCMSF134 is True
Please confirm that you have attached the Reporting Entity's financial accounts for the reporting period	LCMSF107	True/False	Mandatory question

Declarations

Reporting entity declaration

Required if the statement is submitted by the reporting entity.

Table 15: Reporting entity declaration

Question	Question ID	Valid values	Comments
Reporting Entity declaration statement	LCMSF55	True/False	<i>I declare that the information transmitted in this report is to my knowledge</i>

accepted indicator			<i>true and correct and that I am authorised to make this declaration</i>
Reporting Entity declaration signature date	LCMSF56	YYYY-MM-DD	The actual date on which the declaration is signed by the reporting entity
Reporting Entity declaration signatory identifier	LCMSF57	A user login, a full name or an email address	Maximum of 200 characters

Intermediary declaration

Required if the statement is submitted by an intermediary.

Table 16: Intermediary declaration

Question	Question ID	Valid values	Comments
Intermediary declaration statement accepted indicator	LCMSF58	True/False	<p>I declare that:</p> <ul style="list-style-type: none"> • All of the information I have provided to the agent for the preparation of this document is to my knowledge true and correct • I authorise the agent to give this document to the

			Commissioner of Taxation
Intermediary declaration signature date	LCMSF59	YYYY– MM–DD	The actual date on which the declaration is signed by the intermediary
Intermediary declaration signatory identifier	LCMSF60	A user login, a full name or an email address	Maximum of 200 characters

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Appendixes – local file and master file

Glossary, transaction categories, TP method / CAP method, TP documentation codes / STPRK options, and exclusion list.

Last updated 8 April 2021

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[Appendix A: Glossary](#)

[Appendix B: Transaction categories](#)

[Appendix C: TP method / CAP method](#)

[Appendix D: TP documentation codes / STPRK options](#)

[Appendix E: Exclusion list](#)

Appendix A: Glossary

Table 17: Glossary

Term	Meaning
Assignment	Assignment in law or in equity, including without limitation assignment by declaration of trust
Australian entity	An entity which is an Australian resident for tax purposes
Controlled transactions	Dealings with an International related parties (IRPs)
Debts	Debt receivables including loan receivables
Debt interest	A debt interest under Division 974 of the ITAA 1997
Equity interest	An equity interest under Division 974 or section 820-930 of the ITAA 1997
Foreign entity	Any entity which is not an Australian resident for tax purposes
International related party	See What is an IRP and IRPD?
Intellectual property (IP)	Trademark, patent, design, copyright, other intellectual property or similar property or rights
International related party dealings (IRPD)	See What is an IRP and IRPD?
Ordinary shares	Shares issued by a company carrying proportionate rights to voting and to profit and capital distributions, and carrying no special rights

Short form exceptions list	List of kinds of transactions, that if entered into by the Reporting Entity will mean it will not be eligible to complete the short form local file
Relevant Agreement Series	As described in: Local file – Part B: Guidance on providing International Related Party agreements

Appendix B: Transaction categories

Table 18: IRPDs in tangible property of a revenue nature

Code	Value
TPRN	Tangible property of a revenue nature

Table 19: IRPD service arrangements

Code	Value
TRS	Treasury-related services
MAS	Management and administration services
INSERV	Insurance services
REINSERV	Reinsurance services
RD	Research and development services
SAM	Sales and marketing services
SITS	Software and IT services

TS	Technical services
LS	Logistics services
AM	Asset management services
OS	Other services

Table 20: IRPD use rights

Code	Value
RUIP	Rights to use IP
ORSR	Other rights to use, supply or receive where consideration is royalty under section 6(1) of the ITAA 1936
LF	Licence fees
RRP	Rent of real property
HLPE	Hire or lease of plant or equipment
LHORP	Lease or hire of other property or rights

Table 21: IRPD share-based employment remuneration

Code	Value
SBER	Share based employment remuneration

**Table 22: Other revenue (non-financial)
IRPDs**

Code	Value
CCA	Cost contribution arrangement
ORIRPD	Other revenue IRPDs

Table 23: IRPD derivative transactions

Code	Value
CCIRS	Cross currency interest rate swap
CDCSFFO	Currency derivative (not cross currency interest rate swap), including currency swap, forward, future or option
FFIRS	Fixed for floating interest rate swap (not cross currency)
OIRD	Other interest rate derivative (not cross currency)
CDS	Credit default swap
AS	Asset swap
CDCS	Commodity derivative, including commodity swap, forward, future or option
OD	Other derivative

**Table 24: IRPD debt interests (including ordinary loans
and borrowings)**

Code	Value
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OBL	Ordinary borrowings / loans (excluding trade financing)
TFIN	Trade financing
BND	Bonds
PNOT	Promissory notes
CNTDI	Convertible notes that are debt Interests
CSTDI	Convertible shares that are debt Interests
RPSDI	Redeemable preference shares that are debt Interests
OKDI	Other kinds of debt Interests

Table 25: IRPD debt factoring or debt securitisation

Code	Value
IDF	Inward debt factoring
ODF	Outward debt factoring
IDSEC	Inward debt securitisation
ODSEC	Outward debt securitisation

Table 26: Other kinds of IRPDs of a financial nature

Code	Value
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GILDI	Guarantee or indemnity of liability under debt Interest
GIOKL	Guarantee or indemnity of other kind of liability
IN	Insurance
REIN	Reinsurance
OFD	Other financial dealings

Table 27: IRPDs involving disposal or acquisition of tangible property of a non-revenue (capital) nature

Code	Value
RPRT	Real property
PLEQ	Plant or equipment
OTPRTY	Other tangible property

Table 28: IRPDs involving disposal or acquisition of intangible property or rights of a non-revenue (capital) nature

Code	Value
ASIP	Assignment of IP
IOSH	Issue of ordinary shares
AOSH	Assignment of ordinary shares

IEIOOS	Issue of equity interest other than ordinary shares
AQIOS	Assignment of equity interest other than ordinary Shares
ASSD	Assignment of debts
ASSL	Assignment of liabilities
ASSBC	Assignment of benefit of contracts (excluding assignment of equity interests, debts or IP)
ASSOPR	Assignment of other intangible property or rights

Appendix C: TP method / CAP method

Table 29: Appendix C

Code	Value
APPC	Apportionment of costs
APPI	Apportionment of Income
CUP	Comparable uncontrolled price method
CCA	Cost-contribution arrangement
CP	Cost-plus method
FMUAC	Fixed mark-up applied to cost
FPRP	Fixed percentage of resale price

MC	Marginal costing
PS	Profit split method
RPM	Resale price method
TNM	Transactional net margin method
TNMW	Transactional net margin method (whole-of-entity)
OTH	Other arm's length methods
NON	None
UNKT	Unknown (transfer pricing method)
CPR	Cost Price
DVAL	Directors valuation
DCF	Discounted cash flow
IVAL	Independent valuation
NCON	Nil consideration
QMRP	Quoted market price
WDVAL	Written-down value
OM	Other methods
UNKC	Unknown (capital asset pricing method)

Appendix D: TP documentation codes / STPRK options

Table 30: Appendix D

Code	Value
1	0%
2	1% to less than 25%
3	25% to less than 50%
4	50% to less than 75%
5	75% to less than 100%
6	100%
7	Simplified transfer pricing record keeping (materiality)
8	Simplified transfer pricing record keeping (small taxpayers)
9	Simplified transfer pricing record keeping (distributors)
10	Simplified transfer pricing record keeping (intra-group services)
11	Simplified transfer pricing record keeping (management and administration services)
12	Simplified transfer pricing record keeping (technical services)
13	Simplified transfer pricing record keeping (low level

	loans – inbound)
14	Simplified transfer pricing record keeping (low level loans – outbound)

Appendix E: Exclusion list

Table 31: Appendix E

Code	Value
STPRKIGS	Simplified transfer pricing record keeping (intra-group services)
STPRKMAS	Simplified transfer pricing record keeping (management and administration services)
STPRKTS	Simplified transfer pricing record keeping (technical services)
STPRKLLI	Simplified transfer pricing record keeping (low level loans – inbound)
RUESA	Reimbursement under Employee secondment agreements
LVLRSA	Low value / low risk service agreements
LVLRSPT	Low value / low risk sale and purchase tangible trading Stock agreements
IOS	Issue of ordinary shares

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