



# Public Groups disputes and settlements report insights

Read key insights from our 2024 Public Groups disputes and settlements report.

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We're maintaining our commitment to transparency by releasing our latest findings report.

In September, we published our first 4 **Public Groups findings reports**, providing transparency to taxpayers on large market risks, our programs of work and engagement with large public and multinational companies. Each report had a separate focus and dataset with the information identified through the programs of work and risk analysis conducted in each area. We've just published our last findings report for 2024: **Public and multinational business disputes and settlements findings**.

The **Public and multinational business disputes and settlements findings report** provides insights and key findings for disputes and settlements with public and multinational businesses for 2023–24. This is the second year we're publishing our insights on settlements with public and multinational businesses. However, this year we're broadening last year's scope to include information on disputes.

## Summary of findings

We've observed increasing levels of tax compliance by public and multinational businesses. An additional \$2.2 billion was paid voluntarily as a result of ATO preventative compliance intervention.

We also continue to see a consistent number of audits each year:

- During the year, 24 matters were escalated and endorsed for audit. These matters are ongoing.
- Throughout the year, we issued amended income tax assessments to 24 taxpayers that raised around \$2.5 billion in liabilities. Separately, total liabilities for GST raised were approximately \$363 million.
- We continue to apply penalties in the appropriate cases. During the year we raised liabilities for penalties of approximately \$177 million.
- Global profit shifting risks continue to be a major focus in our audit program. Global profit shifting arrangements are often complicated, both legally and factually. They typically involve related parties located in low or no tax jurisdictions around the world.
- We continue to investigate arrangements where tax avoidance is a concern, and in appropriate cases, the anti-avoidance rules may be applied in preference to, or as an alternative, to the transfer pricing provisions.

Deputy Commissioner Rebecca Saint said, 'Public and multinational businesses play an important and integral role in the functioning of Australia's corporate tax system. To ensure the community have confidence that large businesses are paying their fair share of tax, in addition to our assurance programs, we maintain a robust audit program to address risks and arrangements of concern. This report shares our observations from that program of work, and how we manage the pipeline of disputes.'

'Our audit and compliance programs are primarily funded through the Tax Avoidance Taskforce. For 2023–24, we raised \$2.76 billion in income tax liabilities, and \$363 million of GST liabilities. In addition, a further \$2.2 billion was paid voluntarily as a result of our previous compliance interventions and resolved disputes. Since the Taskforce commenced in June 2016, we have raised \$22.8 billion in liabilities from public and multinational businesses,' Ms Saint said.

The observations we've made through our disputes and resolutions programs provides key insights into how we interact with large taxpayers, and their obligations and risk arrangements.

'We encourage taxpayers to engage with us early and seek advice for complex transactions. As each of the findings reports demonstrate,

early engagement leads to higher positive outcomes for taxpayers,' Ms Saint said.

Read our Public Groups findings reports for more insights:

- Findings Report - Public and multinational business disputes and settlements 2023–24
- Findings Report – Reportable tax position
- Findings Report – Top 100 income tax and GST
- Findings Report – Top 1,000 income tax and GST
- Insights Report – Advice and guidance program

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