



Local file/master file 2018

An in-depth description and explanation of the information requirements of the local file and master file for 2018.

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 when you lodge your 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.

Last updated 8 April 2021

Overview

The 2018 local file is comprised of 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 has no international related party dealings (IRPDs) on the short form exceptions list and meets at least one of the following criteria:</p> <ul style="list-style-type: none">• the aggregate value of its IRPDs is less than A\$2 million• the Simplified transfer pricing record keeping (STPRK) criteria for small taxpayers• the STPRK criteria for materiality.
Local file	<p>Where the reporting entity doesn't meet the criteria for the short form local file, it will be</p>

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
<p>Short form local file</p>	<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>See also:</p> <ul style="list-style-type: none"> • Local file – short form instructions
<p>Local file</p>	<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> <p>The following information for all controlled transactions for the income year:</p> <p>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.</p>

- 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 or 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 or STPRK for the purposes of Part B, whether the transaction is covered by a category on the [exclusions list](#).

Notes:

- In the case of an agreement included in a 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).

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 Advance Pricing Arrangement (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 instructions 2018 – Appendix 8: Guidance on providing International Related Party agreements](#)

Financial information

[Highest quality financial accounts](#) for the Australian reporting entity.

More information

What is an IRP and IRPD?

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

International related parties 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 (or as per ATO approved lodgment concession), 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 [\(ITAA 1997\)](#)).

We are providing entities that choose to take up the administrative solution additional time to lodge Part A of their Local File. The income tax return and relevant sections of the IDS must still be lodged by 15 July 2018, or the relevant due date.

However, Part A of the Local file can be lodged up until 14 September 2018. To be clear, Part A of the Local file must be received by 14 September 2018, to qualify for the administrative solution.

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. 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 (this includes IRP loans, as they are generally considered IRPDs of 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:

- [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 the avoidance of doubt, in applying the criteria in this Exclusions 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 the 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 RAS (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 RAS (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 RAS (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 RAS (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.


For more information, see [Local file instructions 2018](#).

QC 56215

Master file

The master file can be provided as an attachment when you lodge your 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 OECD's [Final Report](#) .


QC 56215

Detailed design

Find out more about lodgment, attachments and message structure.

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

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 to allow reporting entities to provide details of their global parent entity or surrogate parent entity for us to anticipate exchange from the relevant foreign jurisdictions. However, entities lodging the CBC report directly with us must lodge the CBC report separately in accordance with the [OECD XML schema and User Guide](#) .

The 2018 LCMSF comprises the following sections:

- statement [information](#) for basic information relating to the statement being submitted
- [entity information](#) about the reporting entity, the global parent entity (where applicable) and declarations
- [master file](#)
- [CBC report notification](#)
- [local file](#), including the [short form](#), [Part A](#) and [Part B](#)
- Intermediary information (including [Intermediary](#))

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 via one of the following ATO approved channels:

- [Online services for business](#) or [Online services for tax agents](#) using the [File Transfer Facility](#) (not via mail message)
- [Standard Business Reporting](#) [\[external link\]](#) (SBR) using SBR-enabled software.

CBC statements must be submitted via the above channels using a validly generated XML file, otherwise the lodgment will not be considered valid. This XML file is generated by your business management software (that is 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 the ATO.

If the valid lodgments are not received by the due date, increased failure to lodge penalties may be imposed. You may request a deferral by emailing CbCReporting@ato.gov.au if you have difficulty in meeting the due date.

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.

Amendments

The LCMSF does not support delta amendments. When making an amendment to a previously lodged statement (or part thereof), please ensure that all the data related to that statement (or part thereof) is resubmitted along with the corrected data.

Cancelling lodgments

If you would like to cancel a lodgment that has been submitted, please email the [CBC Reporting Team](#).

Attachments

No particular attachment naming convention is enforced, with the exception that:

- filenames must be unique
- cannot exceed 255 characters
- cannot contain the following *illegal* characters: <, >, :, ", /, \, |, ?, *.
- filenames are not case sensitive.

There is a maximum of 500 attachments per lodgment, where the size of any single attachment cannot exceed 20Mb. All attachments embedded in the XML file must also be referenced at the appropriate LCMSF element depending on the type of attachment.

Table 3 outlines the types of attachments that are accepted. Multiple attachments can be embedded for each type:

Table 3: Supported attachment types

Attachment Code	Attachment Type
MSTR	Master File

LFSF	Local File – Short Form
LFPBI	IRP Agreement
LFPBA	APA
LFPBR	Ruling
LFPBF	Financial Statements

Table 4 lists the supported attachment formats that can be embedded within the XML file (using BASE64 encoding). Attachments cannot contain active content, i.e. macros, JavaScript, etc.

Table 4: Supported attachment 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

Message structure table

The following tables provide an overview of the 2018 LCMSF. The question IDs relate to the associated elements provided in the [message structure table](#) [↗](#) (MST) provided to digital service providers.

Reporting Party Information

Table 5: Statement information

Question	Question ID	Valid values	Comments
Amendment	LCMSF1	True/False	<p>Mandatory question</p> <p>Indicates whether this lodgment is an amendment to a previous lodgment</p> <p>Amended lodgments do not include those lodgments where additional statements (or parts thereof) are being lodged for the first time</p>

The Reporting Entity Declaration is required if the statement is submitted by the reporting entity (that is the [intermediary](#) details have not been provided).

Table 6: 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

Table 7: Reporting period

Question	Question ID	Valid values	Comments
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

Entity information

Reporting entity information


Table 8: Reporting entity information

Question	Question ID	Valid values	Comments
Reporting entity ABN	LCMSF7	ABN	A valid TFN
Reporting entity TFN	LCMSF65	TFN	A valid ABN
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 Must be a valid email address
Reporting entity phone	LCMSF22	Mobile or landline	Mandatory question Maximum of 16 characters
Is the reporting entity the head entity of a tax consolidated group?	LCMSF15	True/False	Mandatory question
Is the reporting entity the provisional head entity of a Multiple entry	LCMSF16	True/False	Mandatory question

consolidated (MEC) group?			
Is the reporting entity an Offshore banking unit (OBU)?	LCMSF61	True/False	Mandatory question

Global parent entity information

Table 9: Global parent entity information

Question	Question ID	Valid values	Comments
Is the Reporting Entity the Global Parent Entity?	LCMSF66	True/False	Mandatory question If True, go to Master File section If False, go to LCMSF11
Global Parent Entity name	LCMSF11	Legal name of the entity	Must be provided if LCMSF66 is False Maximum of 200 characters
Global Parent Entity tax jurisdiction	LCMSF12	Country code 	Must be provided if LCMSF66 is False
Global Parent Entity ABN	LCMSF9	ABN	If LCMSF12 is "AU" (Australia), either a valid


			ABN or TFN is required
Global Parent Entity TFN	LCMSF10	TFN	If LCMSF12 is "AU" (Australia), either a valid ABN or TFN is required
Global Parent Entity TIN	LCMSF194	TIN	If LCMSF12 is not "AU" (Australia), a TIN is required

Master file

Table 10: Master file lodgment criteria

Question	Question ID	Valid values	Comments
Does this submission include details regarding your master file?	LCMSF138	True/False	Mandatory question If False, go to CBC report section If True, go to LCMSF81
Has the Commissioner of Taxation, 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 If False, go to LCMSF121

<p>Have you been granted a replacement reporting period for the master file?</p>	<p>LCMSF121</p>	<p>True/False</p>	<p>If True, replacement reporting period dates must be provided</p> <p>If False, go to LCMSF196</p>
<p>Replacement reporting period start date</p>	<p>LCMSF122</p>	<p>YYYY-MM-DD</p>	<p>The start date of the replacement reporting period</p>
<p>Replacement reporting period end date</p>	<p>LCMSF123</p>	<p>YYYY-MM-DD</p>	<p>The end date of the replacement reporting period</p>
<p>How is the master file for your global group being lodged?</p>	<p>LCMSF196</p>	<p>1, 2</p>	<p>1 = Lodgment to the ATO via the Reporting Entity</p> <p>2 = Lodgment to the ATO via another entity</p>
<p>Is your lodgment of the master file also on behalf of other entities forming part of your global accounting group (outside your tax consolidated group)?</p>	<p>LCMSF76</p>	<p>True/False</p>	<p>Required if LCMSF196 = 1</p> <p>If True, LCMSF77 or LCMSF78 must be provided</p>

ABN(s) of the entities	LCMSF77	ABN	Either valid ABNs or TFNs must be provided
TFN(s) of the entities	LCMSF78	TFN	Either valid ABNs or TFNs must be provided
Please confirm that you have attached the master file	LCMSF124	True/False	Required if LCMSF196 = 1 and must be True The master file should meet the information requirements as outlined in Annex I of the OECD Guidance 
Filename(s) for the Master File	LCMSF197	Filename including extension	Required if LCMSF196 = 1 and at least one filename must be provided See Attachments
ABN of the entity	LCMSF19	ABN	Applicable if LCMSF196 = 2 Either a valid ABN or TFN is required
TFN of the entity	LCMSF20	TFN	Applicable if LCMSF196 = 2

			Either a valid ABN or TFN is required
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CBC report notification


A CBC report notification may be submitted with a master file or local file or as a stand-alone lodgment.

Table 11: CBC report - notification

Question	Question ID	Valid values	Comments
Does this submission include details regarding your CBC report?	LCMSF139	True/False	Mandatory question If False, go to Local file section If True, go to LCMSF69
Has the Commissioner, by notice in writing, exempted you from providing the CBC report for this reporting period?	LCMSF69	True/False	If True, go to Local file section If False, go to LCMSF125
Have you been granted a replacement reporting period for the CBC report?	LCMSF125	True/False	If True, replacement reporting period dates must be provided If False, go to LCMSF114

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
Are the details you are submitting regarding the CBC report also on behalf of other entities forming part of your global accounting group but outside your tax consolidated group?	LCMSF114	True/False	If True, a valid ABN or TFN must be provided If False, go to LCMSF199
ABN(s) of the entities	LCMSF115	ABN	Either valid ABNs or TFNs must be provided
TFN(s) of the entities	LCMSF116	TFN	Either valid ABNs or TFNs must be provided
How is the CBC report for your global group being lodged?	LCMSF199	1, 2, or 3	1 = Lodgment to the ATO via the Reporting Entity

			<p>2 = Lodgment to the ATO via another entity</p> <p>3 = Lodgment via an overseas jurisdiction</p>
Are you filing the CBC report as a surrogate parent entity with the filing intended to meet a CBC reporting obligation in other jurisdictions?	LCMSF140	True/False	Required if LCMSF199 = 1
ABN of the entity	LCMSF72	ABN	<p>Applicable if LCMSF199 = 2</p> <p>Either a valid ABN or TFN must be provided</p>
TFN of the entity	LCMSF73	TFN	<p>Applicable if LCMSF199 = 2</p> <p>Either a valid ABN or TFN must be provided</p>
Foreign Entity Name	LCMSF71	Legal Name of Entity	Required if LCMSF199 = 3
Foreign Entity TIN	LCMSF201	TIN	Required if LCMSF199 =

			3
Foreign Entity Tax Jurisdiction	LCMSF74	Country code 	Required if LCMSF199 = 3

Local file

Table 12: Local file

Question	Question ID	Valid values	Comments
Does this submission include details regarding your local file?	LCMSF137	True/False	Mandatory question If False, go to Intermediary section If True, go to LCMSF117
Has the Commissioner, by notice in writing, exempted you from providing the local file for this reporting period?	LCMSF117	True/False	If True, go to Intermediary section If False, go to LCMSF119
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	Required if LCMSF137 is True and LCMSF117 is False At least one value must be provided

Is your lodgment of the Local File – Part A being made as part of the ‘Administrative Solution’?	LCMSF68	True/False	Must be provided if LCMSF119 = Local File - Part A 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

This section must be completed if you have selected that you will be providing the local file – short form as part of this submission at LCMSF119.

Table 13: Local file – short form

Question	Question ID	Valid values	Comments
Did you engage in IRP transactions or dealings	LCMSF27	True/False	Mandatory question

listed on the short form exceptions list for the reporting period?			
Did you have less than \$2m in aggregate IRPDs for the reporting period?	LCMSF28	True/False	Mandatory question What is an IRP and IRPD?
Did you meet the criteria for the Small taxpayers STPRK option for the reporting period?	LCMSF29	True/False	Mandatory question Small taxpayers STPRK option
Did you meet the criteria for the Materiality STPRK option for the reporting period?	LCMSF30	True/False	Mandatory question Materiality STPRK option
Please confirm that you have attached the Local File - Short Form	LCMSF82	True/False	Mandatory question Must be True
Filename(s) for the Short Form	LCMSF204	Filename including extension	Mandatory question At least one filename


			<p>must be provided</p> <p>See Attachments</p>
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Local file – Part A

This section must be completed if you have selected that you will be providing the local file – Part A as part of this submission at LCMSF119.

Table 14: Local file – Part A

Question	Question ID	Valid values	Comments
Transaction Identifier	LCMSF31	Number	Mandatory question Increment number each transaction that is unique link Part B
Related Transaction Identifier(s)	LCMSF206	Number	See here
Transaction type	LCMSF32	Transaction category	Mandatory question See Appendix
Is this transaction part of a Relevant Agreement Series (RAS)?	LCMSF33	True/False	Mandatory question See Local Part B: Guidance provided Internally



			Related agreement
How many transactions are part of the RAS?	LCMSF35	Low / Moderate / High	Require LCMSF True Low = 1 Moderate = 50 High = more
Australian counterparty name	LCMSF207	Legal Name of the Entity	Mandatory question Maximum 200 characters
Australian counterparty ABN	LCMSF83	ABN	Either a ABN or required
Australian counterparty TFN	LCMSF84	TFN	Either a ABN or required
Non-resident counterparty name	LCMSF37	Legal name of the entity	Mandatory question Maximum 200 characters
Non-resident counterparty tax jurisdiction	LCMSF38	Country code 	Mandatory question
Was the transaction/RAS entered into by the non-resident counterparty in the course of its business operations	LCMSF208	True/False	Mandatory question

carried on through a permanent establishment in a different country to its country of tax residence?			
Country of permanent establishment of non-resident counterparty	LCMSF209	Country code 	Require LCMSF True
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 purposes) for the transaction?	LCMSF85	True/False	Mandat questio
Was non-monetary	LCMSF86	True/False	Mandat questio

consideration obtained (of a capital nature for income tax purposes) for the transaction?			
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
Average balance of debt interests held	LCMSF210	\$XX,XXX,XXX,XXX	Applica if Trans Catego OBL, TF BND, PI CNTDI, RPSDI c Mandat LCMSF provide Must no provide LCMSF LCMSF present
Capitalised interest deducted	LCMSF211	\$XX,XXX,XXX,XXX	Applica if Trans Catego OBL, TF BND, PI

			<p>CNTDI, RPSDI c</p> <p>Mandat LCMSF provide</p> <p>Must no provide LCMSF LCMSF present</p>
Average balance of debt interests issued	LCMSF212	\$XX,XXX,XXX,XXX	<p>Applica if Trans Catego OBL, TF BND, PI CNTDI, RPSDI c</p> <p>Mandat LCMSF provide</p> <p>Must no provide LCMSF LCMSF present</p>
Capitalised interest returned	LCMSF213	\$XX,XXX,XXX,XXX	<p>Applica if Trans Catego OBL, TF BND, PI CNTDI, RPSDI c</p> <p>Mandat LCMSF provide</p> <p>Must no provide LCMSF LCMSF present</p>
Book values	LCMSF214	\$XX,XXX,XXX,XXX	<p>Mandat Transac Catego</p>

			IDF, OD IDSEC c ODSEC
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 purposes) for the transaction	LCMSF45	True/False	Mandat questio
Did you enter into a deferred foreign currency payment arrangement in relation to this transaction	LCMSF215	True/False	See FX Guidan Year 2 Applica if Trans Catego TPRN, T MAS, IN REINSE SAM, S LS, AM, RRP, HI SBER
Foreign Currency Reporting Type	LCMSF216	1, 2	Require LCMSF True 1 = Reg short te foreign currenc deferre

			<p>paymer arrange</p> <p>2 = Irre longer- foreign currenc deferre paymer arrange</p>
Foreign Currency Code	LCMSF217	Currency Codes 	Require LCMSF
Amount of foreign exchange losses deducted for the transaction	LCMSF87	\$XX,XXX,XXX,XXX	<p>Applica LCMSF False, c or for Transac Catego FCDST' FCDPT' FCDAP: FCDA FCDRR FCDRR FCDHL FCDHL FCDSB FCDSB</p> <p>Require LCMSF provide</p>
Foreign Currency Code	LCMSF219	Currency Codes 	<p>Applica LCMSF False, c or for Transac Catego FCDST' FCDPT' FCDAP: FCDA FCDRR FCDRR FCDHL FCDHL</p>

			FCDSB FCDSB Require LCMSF provide
Amount of foreign exchange gains returned for the transaction	LCMSF43	\$XX,XXX,XXX,XXX	Applica LCMSF False, c or for Transac Catego FCDST' FCDPT' FCDAP: FCDA FCDRR FCDRR FCDHL FCDHL FCDSB FCDSB Require LCMSF provide
Foreign Currency Code	LCMSF221	Currency Codes 	Applica LCMSF False, c or for Transac Catego FCDST' FCDPT' FCDAP: FCDA FCDRR FCDRR FCDHL FCDHL FCDSB FCDSB Require LCMSF provide
What transfer pricing / capital	LCMSF46	TP method / CAP method	Mandat questio

<p>asset pricing methodology has been applied to this transaction?</p>			<p>See Ap C</p>
<p>What level of transfer pricing documentation has been prepared for this transaction?</p>	<p>LCMSF47</p>	<p>TP Documentation / STPRK codes</p>	<p>Mandat questio</p> <p>Both TF Docum and ST codes c provide one transac</p> <p>When t Transac Catego TPRN, I ORSR, I HLPE, L SBER, C ORIRPC cannot 11, 12, 1 14.</p> <p>When Transac Catego TRS, M. INSERT REINSE SAM, S LS, AM, values c be 13 o</p> <p>When Transac Catego CCIRS, CDCSF FFIRS, C CDS, C AS, OD, PLEQ, OTPRT' IOSH, A IEIOOS,</p>

			<p>ASSD, / ASSBC, ASSOP values c be 8, 9, 12, 13, c</p> <p>When Transac Catego OBL, Tf BND, Pl CNTDI, RPSDI c values c be 8, 9, or 12</p> <p>When Transac Catego IDF, OD IDSEC, ODSEC GIOKL, REIN or values c be 8, 9, 12, 13, c</p> <p>See Ap D</p>
<p>Has the special short-term tenor rule for ordinary borrowings and ordinary loans been applied to this transaction?</p>	<p>LCMSF88</p>	<p>True/False</p>	<p>Mandat questio</p> <p>Must be where t Transac Catego TPRN, T MAS, IN REINSE SAM, S LS, AM, RUIP, C LF, RRF LHORP, CCA, O CCIRS, CDCSF FFIRS, c</p>

			CDS, C AS, OD, ODF, ID ODSEC GIOKL, REIN, C RPRT, F OTPRT' IOSH, A IEIOOS, ASSD, / ASSBC ASSOP
Has the special short-term tenor rule for short term derivatives been applied to this transaction?	LCMSF128	True/False	Mandat questio Must be where t Transac Catego TPRN, ' MAS, IN REINSE SAM, S LS, AM, RUIP, C LF, RRF LHORP, CCA, O IDF, OD IDSEC, ODSEC GIOKL, REIN, C RPRT, F OTPRT' IOSH, A IEIOOS, ASSD, / ASSBC ASSOP TFIN, B PNOT, ' CSTDI, or OKD
Has the special short-term tenor rule for FX	LCMSF129	True/False	Mandat questio

<p>derivatives been applied to this transaction?</p>			<p>Must be where t Transac Catego TPRN, T MAS, IN REINSE SAM, S LS, AM, RUIP, C LF, RRF LHORP, CCA, O IDF, OD IDSEC, ODSEC GIOKL, REIN, C RPRT, F OTPRT IOSH, A IEIOOS, ASSD, / ASSBC ASSOP TFIN, B PNOT, / CSTDJ, or OKD</p>
<p>Is this transaction an OB Activity?</p>	<p>LCMSF63</p>	<p>True/False</p>	<p>Can on True w/ LCMSF True an Transac Catego TPRN, T MAS, IN REINSE SAM, S LS, AM, RUIP, C LF, RRF LHORP, ORIRPE CCIRS, CDCSF FFIRS, / CDS, C AS, OD, TFIN, B</p>

			<p>PNOT, (</p> <p>CSTDI,</p> <p>OKDI, II</p> <p>ODF, ID</p> <p>ODSEC</p> <p>GIOKL,</p> <p>REIN, o</p> <p>Must be where, Transac Catego RPRT, F OTPRT'</p> <p>IOSH, A</p> <p>IEIOOS,</p> <p>ASSD, /</p> <p>ASSBC</p> <p>ASSOP</p> <p>SBER</p>
Is this transaction covered by an exclusion list category?	LCMSF48	True/False	<p>Mandat questio</p> <p>Must be where, Transac Catego RUIP, C LF, RRF LHORP, CDCSF FFIRS, (</p> <p>CDS, C</p> <p>AS, OD,</p> <p>IDF, OD</p> <p>IDSEC,</p> <p>ODSEC</p> <p>GIOKL,</p> <p>REIN, C</p> <p>RPRT, F</p> <p>OTPRT'</p>
What exclusion list category applies to this transaction?	LCMSF49	Exclusion list category code	<p>Require LCMSF True</p> <p>When Transac Catego TPRN, (</p> <p>ORIRPC</p>

			<p>values : RUESA LVLRSF</p> <p>When Transac Catego TRS, M. INSERV REINSE SAM, S LS, AM, valid va are STF STPRKI STPRK RUESA LVLRSA</p> <p>When Transac Catego OBL, TF BND, PI CNTDI, RPSDI, valid va are STF or STPF</p> <p>When Transac Catego ASIP, IC AOSH, AQIOS, ASSL, / ASSOP values :</p> <p>See Ap E</p>
Transaction Comments	LCMSF222	Text	Maximu 4096 charact

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.

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 15: Local file – Part B

Question	Question ID	Valid values	Comments
Transaction Identifier	LCMSF50	Number	Mandatory question Incrementing number for each transaction that is used to link Part A and Part B
IRP transfer pricing / capital asset methodology	LCMSF51	TP method / CAP method	Mandatory question See Appendix C
Is the Reporting Entity unable to obtain the transfer pricing methodology the IRP relied upon for this transaction (from the IRP)?	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	LCMSF52	True/False	Mandatory question If False, go to LCMSF106

agreement covering this transaction (as reported in Part A)?			
Is the Reporting Entity unable 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 True If True, go to LCMSF106
Other Transaction IDs covered by the agreement	LCMSF224	Number	Provide the Transaction ID of other transactions (reported in Part A) that are covered by this agreement
Has this written agreement been previously provided to the ATO?	LCMSF53	True/False	Required if LCMSF52 is True and LCMSF64 is false If False, go to LCMSF89
Title of the agreement	LCMSF54	Title of the IRP	Required if LCMSF53 is

previously provided to the ATO		Agreement	True
Year agreement was previously provided to the ATO?	LCMSF90	YYYY	Required if LCMSF53 is True
Please confirm that you have attached the agreement(s) for this transaction	LCMSF89	True/False	Required if LCMSF53 is False and must be True
Filename(s) of IRP Agreement(s)	LCMSF225	Filename(s) of attachment(s)	Required if LCMSF89 is True At least one filename must be provided See Attachments
Since providing the written agreement to the ATO, has the agreement been amended?	LCMSF91	True/False	Required if LCMSF53 is True If False, go to LCMSF106
Have the amended agreements or agreements incorporating the amendments	LCMSF92	True/False	Required if LCMSF91 is True

been provided to the ATO?			
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
Please confirm that you have attached the amendments for previously provided agreements for this transaction	LCMSF131	True/False	Required if LCMSF92 is False and must be True
Filename(s) of the amended agreement(s)	LCMSF226	Filename(s) of attachment(s)	Required if LCMSF131 is True At least one filename

			<p>must be provided</p> <p>See Attachments</p>
<p>Are there APAs/rulings provided by other jurisdictions for this transaction?</p>	LCMSF106	True/False	<p>Mandatory question</p> <p>If False go to LCMSF107</p>
<p>Which other Transaction IDs does that APA / ruling cover?</p>	LCMSF228	Number	<p>Provide the Transaction ID of other transactions (reported in Part A) that are covered by this APA , Ruling</p>
<p>Has the Reporting Entity previously provided these APAs / rulings to the ATO?</p>	LCMSF134	True/False	<p>Required if LCMSF106 is True</p> <p>If False, go to LCMSF135</p>
<p>What is the year in which the Reporting Entity previously provided these APAs/rulings?</p>	LCMSF136	YYYY	<p>Required if LCMSF134 is True</p>
<p>Please confirm that you have attached the relevant APAs/rulings</p>	LCMSF135	True/False	<p>Required if LCMSF134 is False and must be True</p>

for this transaction			
Filename(s) of the APAs / Rulings	LCMSF229	Filename(s) of attachment(s)	Required if LCMSF135 is True At least one filename must be provided See Attachments
Please confirm that you have attached the Reporting Entity's financial accounts for the reporting period	LCMSF107	True/False	Mandatory question
Filename(s) for the financial statements	LCMSF230	Filename(s) of attachment(s)	Required if LCMSF107 is True At least one filename must be provided See Attachments

Intermediary

Intermediary information

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

Table 16: 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 Must be a valid email address
Intermediary phone	LCMSF5	Mobile or landline	Maximum of 16 characters
Tax agent number (TAN)	LCMSF6	TAN	Must be a valid TAN

Intermediary declaration

Required if the statement is submitted by an intermediary.

Table 17: Intermediary declaration

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

			<i>knowledge true and correct</i> <ul style="list-style-type: none"> • <i>I authorise the agent to give this document to the Commissioner of Taxation.</i>
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

Appendix A: Glossary

Table 18: 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 19: IRPDs in tangible property of a revenue nature

Code	Value
TPRN	Tangible property of a revenue nature

Table 20: 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 21: 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 22: IRPD share-based employment remuneration

Code	Value
SBER	Share based employment remuneration

Table 23: Other revenue (non-financial) IRPDs

Code	Value
CCA	Cost contribution arrangement
ORIRPD	Other revenue IRPDs

Table 24: 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 25: IRPD debt interests (including ordinary loans and borrowings)

Code	Value
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 26: 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 27: Other kinds of IRPDs of a financial nature

Code	Value
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 28: 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 29: 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

Table 30: Foreign Exchange IRPDs

Code	Value
FCDSTTS	Foreign currency deferred payment arrangement for sale of Tangible Trading Stock
FCDPTTS	Foreign currency deferred payment arrangement for purchase of Tangible Trading Stock
FCDAPS	Foreign currency deferred payment arrangement for provision of Services
FCDAAS	Foreign currency deferred payment arrangement for acquisition of Services
FCDRRP	Foreign currency deferred payment arrangement for rent of real property to IRP
FCDRRPI	Foreign currency deferred payment arrangement for rent of real property from IRP
FCDHLP	Foreign currency deferred payment arrangement for hire or lease of plant or equipment to IRP
FCDHLPE	Foreign currency deferred payment arrangement for hire or lease of plant or equipment from IRP
FCDSBER	Foreign currency deferred payment arrangement

	for share based employment recharge to IRP
FCDSBERI	Foreign currency deferred payment arrangement for share based employment recharge from IRP

Appendix C: TP method / CAP method

Table 31: 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 32: 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	<u>Simplified transfer pricing record keeping (materiality)</u>
8	<u>Simplified transfer pricing record keeping (small taxpayers)</u>
9	<u>Simplified transfer pricing record keeping (distributors)</u>
10	<u>Simplified transfer pricing record keeping (intra-group services)</u>
11	<u>Simplified transfer pricing record keeping (management & administration services)</u>
12	<u>Simplified transfer pricing record keeping (technical services)</u>
13	<u>Simplified transfer pricing record keeping (low level loans – inbound)</u>
14	<u>Simplified transfer pricing record keeping (low level loans – outbound)</u>
15	Green Zone (<u>PCG 2017/1</u>)
16	Green Zone (<u>PCG 2017/4</u>)

Appendix E: Exclusion list

Table 33: Appendix E

Code	Value
STPRKIGS	Simplified transfer pricing record keeping (intra-group services)
STPRKMAS	Simplified transfer pricing record keeping (management & administration services)
STPRKTS	Simplified transfer pricing record keeping (technical services)
STPRKLLI	Simplified transfer pricing record keeping (low level loans – inbound)
STPRKLLO	Simplified transfer pricing record keeping (low level loans – outbound)
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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