



Top 100 program

Information about the income tax and GST assurance programs for the Top 100 business and super fund taxpayers.

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Top 100 justified trust program

Applying justified trust to the top 100 population and our latest Top 100 findings report.

Last updated 18 November 2025

Applying justified trust to the top 100 population

[Justified trust](#) is a concept from the Organisation for Economic Cooperation and Development (OECD).

We originally introduced the justified trust concept starting with the [top 100 population](#) in 2016.

We complete justified trust reviews as part of the yearly pre-lodgment compliance review (PCR). The [Engaging early with you publication](#) has information on:

- what to expect in a PCR
- PCR timelines
- our expectations around pre-lodgment disclosures.

In these reviews, we apply consistent rating categories to our overall level of assurance. We apply a high assurance rating where we have confidence that you paid the right amount of income tax for the period reviewed.

Due to the size and complexity of taxpayers in the top 100 population, we expect it may take some taxpayers several years to reach high assurance.

We are working with each of the top 100 as part of the PCR process to gain and maintain a high level of assurance. We will tailor future engagements to focus on new, unassured areas and changes.

The [Top 100 program – Tailored approach to obtaining, maintaining and refreshing assurance](#) outlines the stages of the Justified Trust cycle for income tax.

High level of assurance

When you, as a top 100 taxpayer, attain an overall high level of assurance under our justified trust program, it means we have confidence that you've complied with Australian income tax laws.

In recognition of the level of trust we have in the reported tax outcomes of these taxpayers, we will tailor our future engagement approach to focus on maintaining our high level of confidence. This is known as the [monitoring and maintenance approach](#). This approach will apply to taxpayers for the 3 income years following an overall high assurance outcome.

To reaffirm our confidence that you continue to pay the right amount of income tax, we will refresh our understanding and evidence base every fourth income year. We do this by running a [refreshed justified trust review](#) (refresh review).

Top 100 Findings report

Our [Findings report – Top 100 income tax and GST assurance programs](#) covers our key findings each year from completed tax assurance reviews.

These findings will help you understand how we apply the justified trust methodology to either:

- have greater assurance that top 100 taxpayers are paying the right amount of income tax or GST
- identify areas of tax risk for further action.

For more information about the Top 100 program, email Top100@ato.gov.au.

QC 60472

Top 100 GST assurance program

Explains the top 100 GST assurance program, how to prepare for a review and what happens after a review.

Last updated 20 November 2025

About the Top 100 GST assurance program

The Top 100 GST assurance program:

- seeks greater assurance that [top 100 taxpayers](#) are reporting the right amount of goods and services tax (GST)
- supports and expands on existing compliance approaches, including justified trust reviews for income tax, further enhancing confidence in these taxpayers.

What to expect during your initial GST assurance review

We gain assurance, or identify areas of GST risk, by engaging with you through a GST assurance review (initial review), and subsequent tailored engagements.

When commencing an initial review, we will:

- notify you before we start a review
- give you time to consider making a [voluntary disclosure](#) of any tax shortfalls.

We encourage you to review your GST systems and records to check you haven't made any mistakes before we commence our review.

GST assurance review framework

A Top 100 GST assurance review typically involves initial discussions with a tax officer to establish the framework in which we will conduct the review.

You will be provided with a GST assurance review framework. This is a living document that will be updated during the review as required and will include the scope of the review.

Areas of review

During the initial review, we review 4 focus areas and look for evidence that:

- GST controls within your [tax governance framework](#) (including the design of business systems to create, capture and report

transactions correctly for GST purposes)

- exist (Stage 1)
- are designed effectively (Stage 2)
- are operating in practice (Stage 3)
- none of the GST risks we have flagged to the market are present
- the GST outcomes are correctly reported, and atypical, new, or large transactions are appropriate
- we can understand and explain the various streams of economic activity and how they are treated for GST. This will include applying the [GST analytical tool](#) (GAT) unless you are a taxpayer with predominantly input taxed supplies.

How we undertake these activities is tailored to your circumstances, having regard to:

- your overall GST performance
- the type and size of your business activities
- your tax control framework for GST purposes
- our understanding of your business or transactions from prior engagements including income tax pre-lodgment compliance reviews (PCRs).

Ongoing discussions and disclosures

We encourage taxpayers to make disclosures about material new transactions and business changes prior these occurring. You can make disclosures as part of any regular discussions and interaction in ongoing income tax PCRs. We may also identify and raise issues for discussion.

To understand more about our expectations for disclosures and how we will action these, see [Top 100 Pre-lodgment disclosure framework](#).

What to expect following your initial review

Once the initial review is concluded, we will provide each reporter with a tailored assurance approach that seeks to build upon and leverage as far as possible from previous assurance activities.

At the conclusion of the initial review, we will share our findings with you in writing. This includes discussing:

- the overall assurance rating, including a summary of assurance attained or refreshed across the 4 focus areas of justified trust
- a summary of objective evidence relied upon
- our proposed future assurance plan, including our expectations of actions to be taken prior to the next review.

Our overall assurance rating guides our future engagement with you. An explanation of assurance ratings is provided in our [Findings report – Top 100 income tax and GST assurance programs](#).

What to expect in your subsequent reviews

If you attain overall low assurance in your initial review, we will continue annual reviews until overall high or medium assurance is attained.

How we will focus our efforts each subsequent year is explained in our [Tailored approach to attaining, maintaining and refreshing GST assurance](#).

When you attain an overall high or medium level of assurance, we:

- may undertake targeted assurance activities, where necessary
- will otherwise take a monitoring and maintenance stance for the next 3 financial years
- will conduct either a refresh review or an assurance check-in in the fourth year, based on eligibility.

More information about our monitoring stance and future engagement approaches, including eligibility for an assurance check-in, is outlined in our guidance, [Future GST engagement after initial GST assurance review](#).

Preparing for a GST assurance review

[Engaging early with you](#) includes information on our expectations around [pre-lodgment disclosures](#).

GST governance framework

The [GST Governance, Data Testing and Transaction Testing Guide](#) contains detailed guidance on how the justified trust methodology is applied. It explains how:

- the justified trust methodology helps conduct a self-review of your tax control framework for GST purposes before the start of an initial or refresh review
- to undertake data and transaction testing to ensure your business systems are creating, capturing and correctly reporting GST.

GST analytical tool

The GST analytical tool (GAT) is one of the tools we use to have greater assurance you are paying the right amount of GST.

The GAT helps us to:

- understand the reasons for the key differences arising between accounting and GST figures
- verify these differences with objective evidence if possible.

The GAT isn't intended for use if you are a taxpayer with predominantly input taxed supplies.

The [GST analytical tool FAQ](#) and [Top 100 GAT example](#) will help you when considering the application of the GAT.

Using an independent third-party advisor for data testing

You may be considering engaging the services of an independent third-party advisor to undertake data testing for a notified top 100 GST assurance review.

Our [Guide to independent data testing by third-party advisers](#) is available to give you practical guidance on:

- our expectations
- the conditions that the third-party adviser must meet to undertake the independent data testing.

This is so we can rely on the independent data testing in a GST assurance review. Make sure you speak with us before engaging an independent third party advisor for data testing.

Top 100 Findings report

We publish our [Findings report – Top 100 income tax and GST assurance programs](#) annually. The report covers our key findings from income tax and GST assurance reviews completed in the previous year.

Our findings will help you understand how we apply the justified trust methodology to:

- obtain greater assurance that top 100 taxpayers are paying the right amount of income tax or GST
- identify areas of tax risk for further action.

More information

For more information about the Top 100 GST assurance program, email Top100@ato.gov.au.

QC 60473

Top 100 population

How we identify and categorise the top 100 and our engagement approach with this population.

Last updated 11 October 2021

The top 100 population consists of public and multinational businesses and super funds that have substantial economic activity related to Australia. They form the largest contributors to corporate income tax, excise, and petroleum resource rent tax (PRRT) collections. They are some of the largest remitters of goods and services tax (GST).

As the top 100 can have a significant effect on the health of our tax system, we engage with them one-to-one to manage their compliance.

How we identify and categorise the top 100

We make an assessment of each large public and multinational business at the economic group level. We consider an economic group to include all Australian-based entities under a direct or indirect Australian or foreign majority controlling interest.

We initially identify top 100 taxpayers based on the size of their Australian operations. Other factors we consider include income tax, GST, PRRT or excise paid and the influence the taxpayer may have on their market segment.

We apply an Action Differentiation Framework (ADF) to our top 100 taxpayers. This is based on a point-in-time assessment of a taxpayer's:

- transparency in terms of their engagement with us
- choices and behaviours as evidenced in their tax affairs
- level of risk they exhibit.

Top 100 engagement approach

Our engagement with top 100 taxpayers is tailored or differentiated according to the ADF engagement approach. There are three ADF engagement experiences:

- partnering
- encouraging
- influencing.

We use our professional judgment to make this assessment. The factors we consider in making our assessment vary for each tax product and by the information we have and the interactions we have with each taxpayer. We consider quantitative and qualitative measurements.

Top 100 taxpayers receive an annual letter from the Commissioner of Taxation advising them of how we will tailor our engagement with them across a range of services and approaches under the ADF. We clearly outline:

- the engagement approach

- the basis of our assessment
- what this means for the taxpayer
- how we intend to engage with them over the next 12 months.

We also give top 100 taxpayers additional detail about:

- our concerns where we have finalised a justified trust review for income tax or GST
- the areas of their economic and tax affairs over which we have assurance
- our future engagement approach, which has been outlined in the annual tax assurance reports.

See also:

- [Justified trust](#)
- [Action Differentiation Framework](#)

QC 54108

Top 100 tax governance framework

How we assess tax governance frameworks in the Top 100 justified trust assurance program.

Published 20 November 2025

Tax governance guidance and findings

We outline best practices, self-assessment procedures and detailed examples to assist top 100 taxpayers to review their governance frameworks in the:

- [Tax risk management and governance review guide](#)
- [GST Governance, Data Testing and Transaction Testing Guide](#).

We publish key findings from income tax and goods and services tax (GST) assurance reviews completed in the previous year, with

observations on governance, in our annual [Findings report – Top 100 income tax and GST assurance programs](#).

GST assurance program

When reviewing your tax control framework for [GST purposes](#), we apply the [GST Governance, Data Testing and Transaction Testing Guide](#) (the Guide).

We consider the following 3 GST controls to be fundamental:

1. Periodic internal controls testing – board-level control 4 ([BLC4](#))
2. Data controls – managerial control 4 (MLC4)
3. Documented GST control framework – managerial control 6 (MLC6).

The design of these controls directly influences the likelihood that the right amount of GST is reported.

We will review these controls as well as the other 5 common controls, BLC1, BLC3, MLC1, MLC3 and MLC7, across both income tax and GST.

Board-level control (BLC) 4: Periodic testing

To attain a Stage 2 rating for this control, your periodic internal controls testing needs to be:

- documented
- approved
- independent.

For testing frequency and scope, we need a periodic (3-to-5-year) rotating testing plan. This should cover all the controls. These include any common controls with income tax (BLC3, MLC 1, 3, 4, 6, 7). These core requirements are consistent with our income tax approach.

In addition, you should give sufficient evidence about:

- who is conducting the testing (an independent reviewer and not the control owner)
- the testing methodology (refer to section [4.3.2 Core elements](#) of the Guide for details).

We may assign a provisional Stage 2 rating for this control in limited circumstances.

To be eligible for a provisional Stage 2 rating, we need a written undertaking. This undertaking is that you will give us your finalised and approved testing plan after the completion of our GST assurance review.

Best practice periodic controls testing program

Our view of a best practice (optimal) periodic controls testing program is as follows.

MLC4 and MLC6

MLC 4 and MLC 6 should be tested regularly for GST, given:

- the importance of these controls for accurate GST reporting
- there are 12-monthly business activity statement (BAS) returns annually.

We state in the Guide that the test frequency is ideally annually, but this isn't a core requirement.

MLC 4 and MLC 6 are to be front-loaded in the testing plan (ideally within the first 2 years).

MLC7

MLC 7 is a common control, but likely to require some intensity of review for GST separately to income tax. This is because the procedures to explain significant differences between accounting figures and the BAS or income tax return are designed differently and operate separately.

Frequency

The frequency is to be determined by the independent reviewer, subject to the principles set out in the Guide.

After first testing

Once each control has been tested, the independent reviewer should consider the following in determining the timing of re-testing:

- the outcome of that testing including the extent of any remediation action required
- changes in business, reporting or accounting systems
- significant business acquisitions or disposals

- changes in your GST profile
- changes in design of governance controls or control owners.

It needs to be established that the framework is designed and operating effectively and tested successfully (that is, post the initial testing). After that, we would expect that all controls be retested within a rolling 3 to 5-year period. Best practice is every 3 years.

If the retesting period extends beyond 5 years up to a maximum of 7 years, you can engage with us to discuss.

We would also expect controls to be retested where there have been any material changes to the controls. Examples are:

- new enterprise resource planning systems
- new subsystems
- business structure changes.

Income tax assurance program

You can find practical guidance on how we review and rate income tax governance to assist large public and multinational businesses at [Reviewing tax governance for large public and multinational businesses.](#)

More information

For more information about the Top 100 justified trust assurance program, email Top100@ato.gov.au.

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Our commitment to you

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year before making decisions based on that information.

If you feel that our information does not fully cover your circumstances, or you are unsure how it applies to you, contact us or seek professional advice.

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