Australian Government

Australian Taxation Office

International dealings schedule 2020

3345062

When completing this form

Place X in ALL applicable boxes.

Print clear	ly in BLO	CK LET	TERS us	sing a bla	ack pen	only.
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How to complete this form

For explanations and instructions on how to complete this schedule, refer to the International dealings schedule instructions 2020, available from our website at ato.gov.au

1 This schedule forms part of the tax return of: Name of entity	
Tax file number	
Australian business number (ABN)	

Section A: International related party dealings

A No Go to guestion 2a Go to question 1b Yes

For information on Country-by-Country reporting, refer to the IDS instructions.

1b Have you lodged Part A of your local file at the same time as your income tax return?

A No Go to question 2a Yes Go to question 18

If you choose to voluntarily lodge Part A of your local file at the same time as your income tax return, you will not need to complete questions 2 to 17 of the IDS.

2a Is the total of your international related party dealings over \$2 million? Yes

Yes

- A No Go to question 17
- Go to question 2b
- 2b Are you a small business entity, not a significant global entity and your international related party dealings do not exceed 50% of your current year aggregated turnover?

Go to question 3 A No

Go to question 18

3 Did you have dea located in specifi			es?										n the dealings with related parties
				e follow t dollar	/ing ii value	nfor e of	mat rela	ion f ted	or th	ne th v dea	nree o alina	countr s.	ies with
Foreign Activity country code		Expend			, chi chi				росн с,	,	S		Revenue
B C	D \$,		,					-	×	E \$	
C	D \$									-	\Join	E \$	
C	D \$,					-	\Join	E \$	
All other amounts	F\$									-	\Join	G \$	
	1.0		, 		,							ν¢	
	12		, 🗌		, 🗌							K \$	
	J \$, 🗌		, 🗌					•	\bowtie	K \$	
	J\$, 🗌		, 🗌			, []		-	\Join	K \$	
All other amounts	L \$, 🗌		, 🗌			, 🗆		•	×	M \$	
N	P \$,		,			,		•	\Join	Q \$	
0	P \$,		,					-	\Join	Q \$	
0	P \$									-	\Join	Q \$	
All other amounts	R \$										\bowtie	S \$	
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4 Did you have dea	lings	s with	, inter	rnatio	, 💷	rela	Itec	pa	rtie				
4 Did you have dea A No Ye										s lo	ocate	ed in	specified countries?
A No Ye Specified Activity		Provi the h	de the ighes							s lo	ocate	ed in specifi s.	specified countries? ed countries with
A No Ye			de the ighes							s lo ne th y dea	ocate	ed in specifi s.	specified countries?
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A No Ye Specified Activity B C C C C C C	2 D \$ D \$ D \$ F \$ J \$	Provi the h	de the ighes							s lo ne th y dea	vcata nree s aling: ≫ ≫ ≫ ≫ ≫	ed in specifi s. E \$ E \$ G \$ K \$	specified countries? ed countries with Revenue , , , , , , , , , , , , , , , , , , ,
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5	Did you have any international related party dealings involving tangible property of a revenue nature, including trading stock and raw materials?
	A No Yes Provide the following information
	Tangible property of a revenue nature including trading stock and raw materialsof dealings with documentationExpenditureRevenuemethodologycode
C \$	
6	Did you have any international related party dealings involving royalties or licence fees?
	A No Yes Provide the following information
6a	Royalties Percentage of dealings with
	Deductions Income Main pricing documentation methodology code
C \$	
6b	Licence fees Percentage of dealings with
	Deductions Income Main pricing documentation methodology code
C \$	└_ _,└_ _ ,└_ _,└_ _
7	Did you have any international related party dealings involving rent or leasing?
	A No Yes Provide the following information
	Rent/leasing Percentage of dealings with Main pricing documentation
0.0	Expenditure Revenue methodology code
C \$	
8	Did you have any service arrangements with international related parties?
	A No Yes Provide the following information
8a	Treasury related services 8b Management and administration services Expenditure Expenditure
C S	; C \$
DS	
	Main pricing Percentage of dealings with Main pricing Percentage of dealings with
	methodology documentation code E F
8c	Insurance 8d Reinsurance
0	
CS	Revenue Revenue
DS	
	Main pricing methodology Percentage of dealings with documentation code Main pricing methodology Percentage of dealings with documentation code

•			
8e	Research and development	8f	Sales and marketing services
C \$		C \$	
D \$		D \$	
	Main pricing Percentage of dealings with methodology documentation code		Main pricing Percentage of dealings with methodology documentation code
E	F F	E	F
8g	Software and information technology services Expenditure	8h	Technical services Expenditure
C \$		C \$	
D \$		D \$	
	Main pricing Percentage of dealings with methodology documentation code		Main pricing Percentage of dealings with documentation code
E	F	E	F
8i	Logistics Expenditure	8j	Asset management Expenditure
C \$		C \$	
D \$		D \$	
	Main pricing Percentage of dealings with methodology documentation code		Main pricing Percentage of dealings with methodology documentation code
E	F F	E	F
8k	Other services (specify in label H below) Expenditure		
C \$			
D \$			
Е	Main pricing methodology Percentage of dealings with document	ation o	code
	Description		
H			
9	A No Yes Provide the following information		
9a	Derivatives		Percentage of dealings with
	Expenditure Revenue		
C \$,,,,, D\$,		,,,
	Principal derivative types Derivative code Derivative code Derivative	tive co	ode
G1	G2 G3		
9c	Did you engage in the trading of derivatives globally th you shared global profits from these activities with inte	roug ernati	h a trading structure in which onal related parties?
H	No Yes		
L			

10 Did you enter into any debt factoring or securitisation arrangements with international related parties	7 s?
A No Yes Provide the following information Percenta	70
10a Debt factoring Book value Consideration Main pricing documer methodology code	s with
10b Securitisation Percenta Main pricing document	is with
C\$,,,,,,, _	
11 Did you have any dealings of a financial nature other than those covered in questions 9 and 10 with international related parties?	
A No Provide the following information	
11a Amounts borrowed I \$	×
11b Amounts loaned I \$	×
11c Interest Main pricing methodology Percenta of dealing document of do	s with
11d Guarantees Main pricing methodology Percenta of dealing documer code C \$,,,,,,,,,,,	is with
11e Insurance Expenditure Revenue Main pricing methodology Main pricing methodology C\$,	s with
11f Reinsurance Main pricing methodology Percenta of dealing documer code C \$	s with



11g Have you returned a foreign exchange gain or deducted a foreign exchange loss in relation to dealings with international related parties?	
A No Provide the following information for the three types of related party dealings with the highes total dollar value of foreign exchange gain and foreign exchange loss.	st
Transaction	
type Currency Foreign exchange losses deducted Foreign exchange gains returned B C D S <td>⊡•≫</td>	⊡ •≫
	×
	·×
All other currencies F \$ G \$	⊡ •≫
н I I I I I I I I I I I I I I I I I I I	⊡· ≫
I	
I , _ , , _ , , , _ , , _ , , , _ , , _ , , _ , , _ , , , _ , , _ , , _ , , _ , , _ , , _ , , , _ , , _ , , , _ ,	 ×
	×
N 0 P\$ 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
0	
0	
11h Other financial dealings (specify in label H below) Percent of the second	entage
	ealings with mentation
C\$, D\$, D\$, D\$, D\$, C\$ F	
Description	
12 Did you have any other international related party dealings of a revenue nature not reported at questions 5 to 11?	
A No Yes Provide the following information	entage
Other (specify in label H below)	alings with mentation
Description	
H	

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13	Did you dispose of or acquire any tangible/intangible property of a non-revenue to or from international related parties not reported at questions 5 to 11?	e (capital) nat	ure
	A No Yes Provide the following information Tangible property Consideration received	Main capital asset pricing methodology	Percentage of dealings with documentation code
C \$	└,└,└,└,└,└,└,└,└,└_	G	F Percentage
13b C \$	Assignment of intellectual property Consideration paid Consideration received Consideration	Main capital asset pricing methodology	of dealings with documentation code
13c C \$	Assignment of shares or other equity interests Consideration paid Consideration received Consideration received Consideration received Consideration received	Main capital asset pricing methodology G	Percentage of dealings with documentation code
13d C \$	Assignment of loans or debts (not liabilities) Consideration paid Consideration received Consideration received Consideration received Consideration received	Main capital asset pricing methodology G	Percentage of dealings with documentation code
13e C \$	Other intangible property Consideration paid Consideration received Consideration received Consideration received Consideration received	Main capital asset pricing methodology G	Percentage of dealings with documentation code
	Cost plus remuneration for R&D type services Did you receive or were entitled to receive remuneration from international related parties of performance of R&D type services?	on a cost-plus l	basis for the
C \$	A No Yes Provide the following information Costs on which margin calculated Cost-plus margin remuneration D\$		
14	Did you provide any of the following for no payment or a non-monetary payment following for a non-monetary payment to/from an international related party? services assets liabilities	it, or receive	any of the
	 property – tangible or intangible (eg. intellectual property) processes rights or obligations. A No Yes Provide the following information (where applicable) 		
	Capital Revenu	-	73
14a	No payment B C D E	Nature of item	33450920
14b	Non-monetary payment B C B C B C B C C B C C C C C C C C C		

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15	Did you provide or receive share-based employee remuneration to or from an international related party?
	A No Yes you provided or received as part of those arrangements.
	Recharge amounts C \$ $[$, $[$, $[$, $[$, $[$, $[$, $[$, $[$,
16	Were you a party to a cost contribution arrangement for developing, producing or obtaining assets or rights with an international related party?
17	Did a restructuring event(s) occur in the current year involving international related parties or your branch operations? A No Go to question 17b Yes
17a	Provide the following information for the three most material restructuring event(s)
	involving international related parties or your branch operations. Restructuring event 1 Entity or branch Capital value Appendix 7 code Foreign country C D D E G G G F E F C C C C C C C C C C C C C C C C C
	H
	Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?
	Restructuring event 2 Entity or branch Capital value Appendix 7 code Foreign country Percentage of dealings with documentation code C D E G F F Description Description E F F
	Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken? I No Yes
	Restructuring event 3 Entity or branch Capital value Appendix 7 code Foreign country Percentage of dealings with documentation code C D E G Foreign country F Description E E G E F
	H
	Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?
17b	During the last three income years (including the current income year) did you revalue any assets following a restructuring event(s) involving international related parties or your branch operations? B No Yes

	Do you have any branch operations (including Australian branch operations if you are a non-residen	t)?
	A No Yes Provide the following information	
	Amounts claimed or returned for your internally recorded dealings with your branch operations	
	18a Amounts borrowed 18b Amounts loaned	1
		·M
	bearing loans	· ∞
	Interest free loans Average K \$,,, K \$,, _,	· ∞
18c	Internal trading stock purchase costs Trading stock sales proceeds stock transfers I \$	· M
18d	Amounts claimed or returned for other internally recorded dealings Description of amounts claimed/returned]• ×
L		
	If you have more than one type of other internally recorded dealings show each type separately. That is, record an Amount claimed and/or an Amount returned, and a Description for each type	
	of other internally recorded dealing. If you are lodging a paper return provide this additional information as an attachment to the Schedule.	
_		
Se	ction B: Financial arrangements	
Se 19	Did you hold any financing arrangements during the income year where both of the	
	Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties 	
	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment 	
	Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the 	
	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information Amounts received Amounts provided 	·×
	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information 	××
19	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information Amounts received Amounts received Amounts received Average quarterly balance of debt interests]•≫]•≫
19	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information Awerage quarterly balance of debt interests Average quarterly balance of equity D \$,,, E \$,,,, Did you have a financial arrangement for the purposes of Division 230 that did not give rise to a debt interest for the]•≫]•≫
19	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information Average quarterly balance of debt interests B \$]·≫]·≫
19	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the income Tax Assessment Act 1997 (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A NoYesProvide the following information Average quarterly balance of debt interests D\$]•≫]•≫
19	 Did you hold any financing arrangements during the income year where both of the following apply: the arrangement was entered into with international related parties the characterisation between debt and equity is different under Division 974 of the <i>Income Tax Assessment Act 1997</i> (ITAA 1997) (debt equity rules) from your treatment for accounting purposes. A No Yes Provide the following information Amounts received Amounts provided Average quarterly balance of debt interests D \$]∙≫ •≫

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	Are you subject to the Taxation of Financial Arrangements rules contained in Division 230 of the ITAA 1997?
	A No Yes Specify which tax timing method elections you have made.
	Fair value method B Foreign exchange retranslation method – qualifying D Reliance on financial reports method F
ł	Foreign exchange retranslation C Hedging financial E No elections made G arrangements method
Sec	ction C: Interests in foreign entities
	Controlled foreign companies (CFCs) and controlled foreign trusts (CFTs)
	Did you have any interests in CFCs or CFTs?
	A No Go to question 24 Yes Provide the following information
21b \$	Specify the number of CFCs and CFTs in which you had an interest at the end of your income year Listed countries Specified countries Other unlisted countries
I	Number of CFCs and CFTs B C D
21c	Did you acquire any interests in CFCs or CFTs during the income year?
1	A No Yes Specify the number of CFCs or CFTs of which you acquired any interests during the income year Listed countries Specified countries Other unlisted countries
I	Number of CFCs and CFTs B C D
21d	Did you dispose of any interests in CFCs or CFTs during the income year?
1	A No Yes Specify the number of CFCs or CFTs of which you disposed any interests during the income year
I	Number of CFCs and CFTs B C D
	Have your CFCs in the following countries satisfied the active income test for their statutory accounting period(s) under section 432 of ITAA 1936?
	Listed countries Specified countries Other unlisted countries
	A No Yes B No Yes C No Yes
	Did you exclude tainted interest income from the passive income of a CFC which was an AFI subsidiary?
	A No Yes Provide the following information
	Financial intermediary business Did your AFI subsidiary CFCs have banking licences in their countries?
	B No Yes
	Did your AFI subsidiary CFCs principally derive their income from the lending of money?
	C No Go to question 22 Yes Provide the following information
	Specify the total amount of tainted interest income excluded from passive income of your financial intermediary subsidiary CFCs (excluding CFCs with banking licences in their country)
	Listed countries D\$
ç	
	Total G \$,,, •>
	(excluding CFCs with banking licences in their country)
	Listed countries Specified countries Other unlisted countries H I I
L	Page 10 Sensitive (when completed)

22 Specify the amounts included in your assessable income under the following sections of the *Income Tax Assessment Act 1936* (ITAA 1936).

	Section 456 – CFCs attributable income
Listed countries	A\$,,,,×
Specified countries	B\$,,,,∞
Other unlisted countries	C\$,,,∞
Total	D\$,,,∞
	Section 457 – CFCs change of residence
	E\$,,,,
	Section 459A – CFCs / CFTs and interposed Australian entities
	F\$,,,,∞

22a Specify the gross revenue included in the gross turnover of your CFCs that have satisfied the active income test. Listed countries

1
1
1
1

22b Specify the gross revenue included in the gross turnover of your CFCs that have not satisfied the active income test.

Listed countries							
A \$	_,_],[],[]∙≫
Specified countries							
B \$,],[],[]•≫
Other unlisted countrie	s						
C \$,],[],[.₩
Total D \$	_,[],[],[·×



23 Specify the amounts in determining your attribution income for your CFCs

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23a Specify the amounts of notional assessable income under the following sections of the ITAA 1936.

Listed countries CFC (Section 385)
Adjusted tainted income that is eligible designated concession income
A \$,,,,,,
Adjusted tainted income not treated as derived from sources in listed countries B \$ B
(Add A, B and C) D \$
Specified countries CFC (Section 384)
E\$,,,,,
Other notional assessable income
Subtotal G \$ (Add E and F) G \$
Other unlisted countries CFC (Section 384)
H\$,,,,,
Total notional assessable income Add subtotals D, G and J K \$
23b Specify the amounts of notional allowable deductions
Listed countries
A \$,,∞
Specified countries
B\$,,,,
Other unlisted countries
C\$,,,,∞
Total notional allowable deductions D \$

24 Do you have foreign branch operations or any direct or indirect interests in foreign companies or foreign trusts?

		-																				
	A No Go t	o ques	stion 27																			
	Yes Spe	cify the asses	e amour sable u	nt of f	oreign he follo	incon owing	ne you sectio	i deriv	ved f the	that i e ITA/	s A 1936 d	or ITA	A 19	997.								
			Section ncome																			
	Listed countries	B \$,[],[· X												
	Specified countries	C \$,[],[,			×												
	Other unlisted countries	D \$]		,[×												
			Non dee								ing											
		E \$								->>												
			,-		-,-		.,					0.4	0			700						
			Section out of a									24e	dis	tribu	ution	s on	mini	mum	gn eo 110% anies	6 parl	ticip	ation
	Listed countries									·×		B \$									_	\times
	Specified countries	C \$								×		C \$]		_,_ [\sim
	Other unlisted countries	D \$								·×		D \$,]		,_			\sim
		L		/ [J									· ,								
25	Did you have (s25-90 or 230			educ	tions	in ea	arning	g no	n-a	sses	sable	non	-ex	emj	ot fo	oreig	n in	com	ne			
	A No	Yes	Sp 25	Decify	the tot	tal am 4 199	nount o	of del	bt d	educ	tions cla	aimec	d und	der s	\$25-9	90 or						
	Debt deduction foreign income		arning	non-a	assess	able	non-e	xem		в\$]•×	[
														<i>,</i>								
26		any c				- C	- T				i on to ; gains/los											nnanie
	A No	Yes	ar 🔄	nd the	amou	nts of	any re	educt	tions	s mai	de pursi	uant t	:0 SL	ıbdiv	isior	n 768	-G o	f the	ITAA	1997		ipanio
	Capital gain am	ounts	s	B \$ _	,		,			_,		·×										
	Capital gain rec	luctio	ns (C \$,],[],[×										
	Capital loss am	ounts		D \$ [,],[],[×										
	Capital loss red	luctior	ns	E \$,],[],		×										
27	During the las transfer prope existence dur	erty, r	money	or s	ervice	es to																in
	A No	Yes	Pr	rovide	the fol	llowin	g infor	matio	on fo	or the	e three ti	ransfe	ers v	vith	the h	nighe	st do	llar v	alue.			
			ransfer a	mount	JLJ L						Ap	pendix	< 8 e>	emp	tion c	ode						
	Transfer 1	B \$			L,		,			×	C											
	Transfer 2	B \$							•	×	С											

B \$

Transfer 3

•× C

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28	Non-resident trusts and foreign hubs
28a	Were you a beneficiary of a non-resident trust or did you have an interest in, or an entitlement to acquire an interest in, either the income or capital of a non-resident trust during the income year?
	A No Yes
28b	Do any of the schedules within PCG 2017/1 apply to your offshore dealings?
	A No Provide the following information for the types of hub arrangements that have the highest dollar value of property or services imported to, or exported from, Australia.
	Value of expenses/imports in connection Value of revenue/exports in connection Type of hub with each type of hub with each type of hub
	B C \$, , ,
	E F\$, ,
	H I\$, ,
29	Cross-border hybrid entities and hybrid instruments
29 a	Were you a partner in a foreign hybrid limited partnership (FHLP) or a shareholder in a foreign hybrid company (FHC)?
	A No Yes Provide the following information
	Number of FHLPs or FHCs you had an interest in B
	Total amount of your share of FHLP/FHCs net income/profit C \$
	action D: Thin conitalization
	ection D: Thin capitalisation
308	A No Go to question 30b Yes Go to question 31
301	A No Go to question 30b Yes Go to question 31 • Did you rely on one of the following tests in determining the thin capitalisation rules did not disallow any of your
001	debt deductions?
	A \$2 million threshold test No Go to question 40
	B 90% asset threshold test No Yes Go to question 40
	C Exemption of certain special purpose entities No Go to question 40
31	Has an Australian resident company elected under subdivision 820-FB of the ITAA 1997 to treat your qualifying Australian branch operations as part of a consolidated group, MEC group or a single company for thin capitalisation purposes?
	A No Yes Provide the ABN of the entity making that election, then go to question 40.
	Australian business number (ABN) B
32	What was your entity type at the end of the income year?
	A Code
33	Did you change your entity status from 'general' to 'financial' during the income year?
34	What method did you use to calculate your average values?
	A Code
L	

35 General information - to be completed by all thin capitalisation entities

Debt deductions	A\$,,,,
Debt deductions on debt from related non-residents	B\$,,,
Amount of debt deduction disallowed	c\$,,,,
Adjusted average debt	D\$,,,,~~

36 Were you an authorised deposit taking institution (ADI) for the income year? Answer 'Yes' if you entered code 7 or 8 at Question 32 label A.



37 Were you a non-authorised deposit taking institution (non-ADI) for the income year? Answer 'Yes' if you entered code 1, 2, 3, 4, 5, 6, 9 or 10 at question 32, label A.



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38	Did you rely on arm's length tests?	
	A No Yes Provide your arm's length deb	t (non-ADI) or capital (ADI) amount
	▫▫▫,∟∟,∟∟,	,·≫
39	Did you rely on worldwide gearing debt/capital	tests?
	A No Yes Provide the following informati	on where applicable
	ADI	Non-ADI
	Worldwide group capital ratio	Worldwide debt
	Worldwide capital amount	
	C\$	
	,,	Worldwide gearing debt amount
		F\$,,,,,
		Statement worldwide assets
		Average Australian assets
		н\$,,,,
	ection E: Financial Services Entiti	26
40	Are you a foreign bank or other qualifying finance of the ITAA 1936?	cial entity that has not elected out of Part IIIB
	A No Go to question 40c Yes Provide the	ne following information at 40a ${f B}$ to ${f F}$ and 40b ${f G}$ to ${f J}$
40a	Notional amount of interest under Part IIIB	
	Average quarterly notional amount taken to be borrow	ed under section 160ZZZ
	B\$,,,,	
	Specify the main currency of the notional amount take	n to be borrowed under section 160ZZZ
	C	
	Notional amount of interest taken to be paid under sec (excluding amounts attributable to OB activities of offs	
	D\$	
	Notional amount of interest taken to be paid under sec	tion 160ZZZA attributable to OB activities of OBUs
	E\$,,,,,∞	
	Amount of section 160ZZZJ withholding tax paid on no	otional interest amount
	F\$,,,,,	
40b	Notional derivative and foreign exchange transactions	
	Notional amount taken to be paid or received under set G \$ → (amount taken to be paid or received under set)	
		t taken to be paid)
	H\$,,, (amour	t taken to be received)
	Notional amount taken to be paid or received under se	
		t taken to be paid)
	J\$,,,, (amour	t taken to be received)

40c	Are you a foreign bank or other qualifying financial entit	y that has elected out of Part IIIB of the ITAA 1936?
	K No Yes Provide the following informatio	n at L to P
	Average quarterly notional amount taken to be borrowe	d under section 160ZZZ
	L\$,,,,,,,,,_	
	Specify the main currency of the notional amount taken	to be borrowed under section 160ZZZ
	M	
	Notional amount of interest taken to be paid under sect (excluding amounts attributable to OB activities of offsh	ion 160ZZZA
	N \$	lore banking units (OBOS)
	Notional amount of interest taken to be paid under sect	ion 160ZZZA attributable to OB activities of OBUs
	0\$,,,,,	
	Amount of section 160ZZZJ withholding tax paid on not	tional interest amount
	P\$	
40d	Did you have amounts denied under section 160ZZZL o	f the ITAA 1936?
	Q No Yes Provide the following information	on
	Amount denied under section 160ZZZL of the ITAA 1936	3
	R\$	
41	Were you an offshore banking unit (OBU) or the h that included an OBU?	nead company of a consolidated group
	A No Yes Provide the following informatio	n
	41a Borrowing	41b Lending
	Net OB income/loss C \$	
	Assessable OB income from related parties	Assessable OB income from related parties
	D\$,,,,×	D\$,,,
	41c Guarantee-type	41d Trading
	Assessable OB income	Assessable OB income
	Net OB income/loss	Net OB income/loss
	C \$,,,,, /	C \$,,, /
	Assessable OB income from related parties	Assessable OB income from related parties
	D\$,,,,,	D\$,,,,

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

41e Eligible contract	41f Investment
Assessable OB income B \$,,,	
Assessable OB income from related parties D\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Assessable OB income from related parties
41g Advisory	41h Hedging
Assessable OB income from related parties	Assessable OB income from related parties D\$
410 Leasing	
Assessable OB income B \$,,,	
Net OB income/loss	
Assessable OB income from related parties	
41i Other – as declared by regulation	41j General OB deduction and apportionable OB deductions
Assessable OB income	C\$,,,,,,
Assessable OB income from related parties	
41mTotal assessable OB Income / less Total OB deductions	41n Eligible fraction of foreign income tax on OB income claimed under division 770
Assessable OB income	E\$,,,,,
Assessable OB income from related parties	

Section F: Miscellaneous

D\$

E\$

Section 128FA exempt interest paid

42	Did you have a Conduit Foreign Income balance and/or distribute amounts of Conduit Foreign Income during the income year?
	A No Provide the following information
	Balance of conduit foreign income B\$,,,,,,,,,
	Conduit foreign income distributed during income year C \$,,, _,
43	Do you have an unfranked non portfolio dividend account (section 46FB ITAA 1936)?
	A No Provide the following information
	Balance of unfranked non-portfolio dividend account at year end Code B \$,,, _,
44	Did you pay amounts of interest exempt from withholding tax during the income year?
	A No Provide the following information
	Interest paid to financial institution exempt from withholding under a DTA DTA country
	Section 128F exempt interest paid

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1			
Section G: Hybrid Misi	matches		
45 Did the hybrid mismatch rule			
A No Go to question 49	Yes Provide the fo	ollowing information	
46 Have you made or received a	a payment at any time	during the income ve	ear which gave rise to a
deduction / non-inclusion or			
A No Go to question 47	Yes Provide the fo	ollowing information	
46a Total amount of payments w deduction mismatches	which gave rise to ded	uction/non-inclusion	mismatches and deduction/
B\$,,,,			
46b List top three material arran	gements which gave	rise to the mismatch	
Type of hybrid mismatch arrangement	Foreign country		ents made during income year
	B	C \$,,	
A	B	C\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,∞
A	В	C \$	∞
Total amount of deductions denied	or amount of income inclusion	Reason for difference	Were you the recipient of the payment?
D\$,,,,	·∞	E	F No Yes
D\$		E	F No Yes
D\$		E	F No Yes
47 Do your international related		ore hybrid mismatch	?
	e the following information		
Total amount of deductions denied under	subdivision 832-H		
••••••••••••••••••••••••••••••••••••••			
48 Did you pay an amount of int international related party w			
	e the following information	taxed at 10% of less	ſ
	-		
48a Total amount of deductions		1 832-J	
B\$,,,,	·∞		
48b List top three material arran Foreign country of interposed entity		avment	
	B\$		∼ ×
	B\$		
	υ φ,	┘└──┘╷└──┘╷└──┘╷└──┘	
A	B \$,		∼ ×
A A Amount of deductions denied	B\$	Reason	.
C \$,,,,	·,		⊡ •≫
C \$,,,,, C \$,, ,, , ,, ,, ,, , ,, , ,, , , , , , , , , , , , , , , , , , , ,	·,. 		_ •≫
C \$	·,		_ •≫

49	Did you or your international related parties restructure or replace an arrangement in the current
	or prior year which would have been subject to any of the hybrid mismatch rules if the arrangement
	was still in place?

	A	No Yes Provide the following information								
49a	Pro	ovide the following information for the top three most material restructuring event(s)								
	Restructuring event 1									
	l	Description								
	Α									
	As	a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid								
	_	angement before the application of the hybrid mismatch rules?								
	R									
	Restructuring event 2									
	l	Description								
	Α									
	As	a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid								
	_	angement before the application of the hybrid mismatch rules?								
	В									
	Restructuring event 3									
	l	Description								
	A									
		a result of the restructure, has your taxable income remained the same or decreased if compared to the replaced hybrid								
		angement before the application of the hybrid mismatch rules?								
	B									
50	-	you answered yes at question 24, did you receive a foreign equity distribution that gave rise to a								
		reign income tax deduction?								
	Α	No Yes Provide the following information								
50a	Ar	mount that is not non-assessable non-exempt under section 768-7								
	B	\$,,∞								
51	lf v	you answered yes at question 24, did you derive branch hybrid mismatch income?								
		No Yes Provide the following information								
51a		mounts that are not non-assessable non-exempt under subsection 23AH(4A)								
	B	\$,,,,××								

Section H: Taxpayer's declaration

If the schedule is not lodged with the income tax return you are required to sign and date the schedule.

Important

Before making this declaration check to ensure that all the information required has been provided on this form and any attachments to this form, and that the information provided is true and correct in every detail. If you are in doubt about any aspect of the tax return, place all the facts before the ATO. The income tax law imposes heavy penalties for false or misleading statements.

Privacy

Taxation law authorises the ATO to collect information and disclose it to other government agencies. This includes personal information of the person authorised to sign the declaration. For information about your privacy go to **ato.gov.au/privacy**

Declaration:

I declare that the information on this form is true and correct.

Signature

		Day		Month		Year	
	Date] / [/ [
Contact name							
Daytime contact number (include area code)							