

GST Analytical Tool (GAT)

Top 100 example

Contents

GAT example	3
Purpose	3
BAS and Accounting Alignment	4
Key finding	4
Overview	4
BAS & Accounting Summary	5
GST payable reconciliation analysis	6
GST claimed reconciliation analysis	13
Conclusions and Next Steps	22
Appendix A – GAT ratings	24

GAT example

Purpose

The purpose of this document is to provide an example as to how the analysis from applying the GAT will be set out in the Tax Assurance Report (TAR) for a Top 100 taxpayer. This is a fictitious example and is not based on taxpayer data.

BAS and Accounting Alignment

Key finding

As a result of applying the GST Analytical Tool (GAT), we have calculated an effective net GST rate of 10%. This has resulted in a Stage 3 rating for this focus area.

Overview

We have conducted the GAT calculation and analysis for *GAT Pty Ltd* for the year ended 30 June 2019 (2019 financial year). This is based on information *GAT Pty Ltd* has provided, including information available within the ATO and from public sources.

In preparing the GAT calculation, we were required to make a number of assumptions where insufficient information was provided to fully explain and / or reconcile the differences between the figures reported in the financial statements and those reported in the BAS. These include:

- The elimination of accounting figures attributable to Services Pty Ltd which lies in the accounting group but not the GST group
- Movement in balance sheet accounts solely relating to GST-bearing activities
- Payment of rebates resulting in decreasing adjustments (i.e. increase in GST claimed at Label 1B throughout the year).

What the GAT analysis shows is that, for *GAT Pty Ltd* for the 2019 financial year, the key adjustments impacting the effective net GST rate include the following:

- Exports and other GST-free sales of \$60m which are not subject to GST
- Disposal and purchase of assets of \$65m and \$70m respectively of which the gross value was not reflected in the P&L statement
- Rebates paid to customers of \$85m which were offset against total revenue and triggered decreasing GST adjustments
- Payroll expenses of \$150m which are not subject to GST
- Various expenses totalling \$100m which do not contain GST in the price
- Accrued expenses of \$90m which have been recognised for accounting purposes but have not yet been billed or paid.

BAS & Accounting Summary

Below is a summary of the BAS lodged by GAT Pty Ltd for the 2019 financial year.

GST performance	\$m
1A GST payable	\$90
1B GST claimed	\$70
G1 Total sales	\$1,050
G2 Exports	\$25
G3 Other GST-free sales	\$35
G10 Capital purchases	\$70
G11 Non-capital purchases	\$700
Net GST payable/(refundable) (1A -1B)	\$20
Total revenue from financial statements	\$825
1A on total revenue (Effective GST on sales rate – <i>Unadjusted</i>)	10.91%
Adjusted total revenue	\$905
1A on adjusted revenue (Effective GST on sales rate – Adjusted)	9.95%
Total expenses from financial statements	\$750
1B on total expenses (Effective GST on expenses rate – <i>Unadjusted</i>)	9.33%
Adjusted total expenses	\$705
1B on adjusted expenses (Effective GST on expenses rate – Adjusted)	9.93%
Unadjusted net profit from financial statements	\$75
Net GST on net profit (Effective net GST rate – <i>Unadjusted</i>)	26.66%
Adjusted net profit	\$200
Net GST on adjusted net profit (Effective net GST rate – adjusted)	10.00%

GST payable reconciliation analysis¹

The analysis below reconciles the total revenue reported in the consolidated profit and loss statement for the 2019 year with the GST reported on the BAS at label 1A for that period. This analysis seeks to confirm whether we have confidence in why the accounting and GST payable results vary, and each variance is assigned an assurance rating of low, medium or high, and supported by objective evidence.

Item		Description			
Total revenue: financial statements	Total revenue as reported in for the 2019 financial year.	\$825	N/A		
Step 1	GAT Pty Ltd's consolidated a	GAT Pty Ltd's consolidated accounting group consists of the following members:			
Grouping variances ²	Entity	Relationship			
	GAT Pty Ltd	Parent entity			
	Member Pty Ltd	Subsidiary			
	Services Pty Ltd	Subsidiary			
	The GST group does not confor GST purposes. According removed from the calculation				

¹ Note all trial balance accounts have been supplied as part of the GAT workbook responses.

² There will be instances where the GST group would have more members when compared to the accounting group. In these instances, the preferred approach would be to add back accounting figures to match the GST group (note: this may also involve elimination of intragroup transactions on which GST is not applied).

	entity level, from transactions have	ure has been extracted from to which we have confirmed the election that the election over this adjustment.	at no GST-bearin	g intragroup		
Step 2	Exports					
Adjustments -	Accounting treat	<u>ment</u>				
P&L statement	indirect tax zone	eam relates to the supply of g Export revenue is included a financial statements do not c le.	as part of total rev	enue in the financial		
	GST treatment					
	Supplies of this	nature are GST-free as per D	ivision 38 of the C	SST Act.		
	Assurance proce	<u>edures</u>				
	transactions rela	As analysed in section 3 of the TAR, sample testing confirmed that export transactions relate to sales to overseas customers and bills of lading confirmed that GAT Pty Ltd was the exporter and goods were exported within 60 days of invoice date.				
	in the trial balan	tment consists of the followin ce extracted by tax code "So" nualised amount figure at Lab	' (GST export). Th	nis figure also		
		The high level of assurance obtained is further supported by the high level of assurance obtained in respect of correct reporting and the stage 2 governance rating:				
	Account Code	Description	Total amount	"S0" amount		
	0001	Sale of goods	600	20		
	0002	Sale of spare parts	200	5		



Step 2	Other GST-free	sales			(\$35)	•
Adjustments -	Accounting treat	<u>tment</u>				
P&L statement		eams below relate to the sup the financial statements.	oply of medical a	ids included as part of		
	GST treatment					
	GST-free as per	Division 38 of the GST Act.				
	Assurance proce	<u>edures</u>				
		section 3 of the TAR, the tax goods however a limited sup				
	in the trial balan	tment consists of the followice extracted by tax code "Samount figure at Label G3 of	K" (GST-free). Th			
	classified as GS has provided a v classification an but is limited to	the product master list has in T-free when it should have by voluntary disclosure on the st d associated tax coding acc a single product type, we have se GST treatment of this adjuster.				
	Account Code	Description	Total amount	"SX" amount		
	0001	Sale of goods	600	35		
Step 2	Interest Income		(\$10)	•		
Adjustments - P&L statement	Accounting treat Interest income	tment is included as part of total re				

	GST treatment		
	These supplies are input-taxed as per Division 40 of the GST Act.		
	Assurance procedures		
	This amount is consistent with Note 2 of the financial statements and trial balance account 0003 (Bank interest revenue). We have been advised that this revenue stream is generated from passive investments. On the basis set out above, we have a high level of assurance over this adjustment.		
Step 3	Disposal of assets	\$65	•
Capital	Accounting treatment		
adjustments	The gross value of disposal of assets is not recorded on the P&L statement. This figure matches the total disposal value of assets as reported through the Fixed Assets Register and is further supported by proceeds from sale of plant and equipment as disclosed on the Consolidated Statement of Cash Flows for the 2019 financial year.		
	GST treatment		
	The sale of fixed assets is predominantly taxable on which GST is payable as per Division 9 of the GST Act.		
	Assurance procedures		
	As explained in section 3 of the TAR, a sample of 30% of all capital transactions (by value) were analysed and assessed as correctly treated for GST purposes. On this basis, we have a high level of assurance over this adjustment.		
Step 3	Gain on sale of assets	(\$5)	IM
Capital adjustments	This adjustment is related to the disposal of assets. The gain on sale is reported as part of total revenue.		

been billed (i.e. GST treatment	is accrued and recognised in no GST has been recognised	·			
revenue that has	alance exceeds the opening s been accrued throughout the a decreasing adjustment to edures	ne year of which GS			
This adjustment account 0112 "T adjustment to th	has been derived based on rade debtors – accrued". We e difference between the openingly, we have a high level o				
Account Code	Description	2019	2018		
0112	Trade debtors – accrued	95	75		
			<u> </u>	\$40	

Adjustments -	Accounting treatm	<u>ent</u>				
balance sheet	This adjustment relates to advance payments received for maintenance services to be performed in the future. These services are initially recorded as a liability on the balance sheet and are only released to the P&L statement as the service is performed.					
	GST treatment					
	revenue that has a However, this revenue	ance exceeds the opening already been received of enue is yet to be recordenent to revenue is require				
	Assurance proced	<u>lures</u>				
		ed the \$40m amount of t losing balances. Accord ent.				
	Account Code	Description	2019	2018		
	0740	Deferred revenue	60	20		
Step 4	Rebates paid to co	ustomers			\$85	•
Other	Accounting treatm	<u>ent</u>				
adjustments	Total revenue has	been reported net of re				
	GST treatment					
	This adjustment involves converting the net amount to gross figures to match GST reporting. The payment of a rebate would result in a decreasing GST adjustment where the taxpayer claims GST credits.					
	Assurance proced	<u>lures</u>				
	I	on 3 of the TAR, a samp at the taxpayer makes a		_		

	input tax credits at Label 1B of the BAS. The rebates amount has been extracted from Account Code 0010. Accordingly, we have a high level of assurance over this adjustment.				
	Account Code Description Amount				
	0010	Rebates paid to customers	85		
Final adjusted	revenue amount	\$905			
10% of Final ac	10% of Final adjusted revenue amount				
Label 1A amount reported for the period				\$90	
Variance				\$0.5	

GST claimed reconciliation analysis

The analysis below reconciles the total expenses reported in the consolidated P&L statement for the 2019 financial year with the GST reported on the BAS at label 1B for that period. This analysis seeks to confirm whether we have confidence in why the accounting and GST payable results vary, and each variance is assigned an assurance rating of low, medium or high, and supported by objective evidence.

Item		Description				
Total expenses financial statements	Total expenses as reported in financial year.	\$750	N/A			
Step 1 Grouping	GAT Pty Ltd's consolidated ac	(\$10)	•			
variances	Entity	Relationship				
	GAT Pty Ltd	Parent entity				
	Member Pty Ltd	Subsidiary				
	Services Pty Ltd	Subsidiary				
	The GST group does not cons GST purposes. Accordingly, the removed from the calculation.					
	The expense figure has been of the entity level from which we transactions have taken place					



	Accordingly, we h	ave a high level of assurance over this a	djustment.		
Step 2	Payroll Expense			(\$150)	•
Adjustments	Accounting treatm	<u>nent</u>			
P&L statement	Employee benefits P&L statement.	s and payroll expenses are reported as p	part of total expenses in the		
	GST treatment				
	Employee benefit removed from the	s and payroll expenses are not subject to expenses.	GST and should be		
	Assurance proced	<u>dures</u>			
		adjustment is consistent with the line iten onsolidated P&L statement.	n "Employee benefits"		
		of this line item was provided as part of the street of the street amount is fully non-GST bearing			
	Accordingly, we h	ave a high level of assurance over this a	djustment.		
	Account Code	Description	2019		
	2000	Salaries – Employees	100		
	2001	Annual Leave	20		
	2002	Long Service Leave	10		
	2003	10			
	2004	Bonus	10		
Step 2	Financing and Inv	vestment Costs		(\$15)	•
	Accounting treatm	<u>nent</u>			

Adjustments – P&L statement	Finance and interest statement. GST treatment These supplies are in subject to GST. Assurance procedure The taxpayer has not consistent with the value of the consistency of the consiste				
	Account Code	Description	2019		
	2010	Bank interest expenses	10		
	2011	Bank account keeping fees	5		
Step 2	Foreign Exchange Lo	osses		(\$15)	•
Adjustments	Accounting treatment	<u>t</u>			
- P&L statement	This adjustment relat of total expenses.	es to losses from movements in forei	gn currency reported as part		
	GST treatment				
	These amounts are r base.	not subject to GST and should be elim	inated from the expense		
	Assurance procedure	<u>es</u>			
	The figure is consiste	ent with the value reported at 4 of the	2019 financial statements.		
	Accordingly, we have	e a high level of assurance over this a	djustment.		
Step 2	Impairment			(\$5)	IM

Adjustments – P&L	This adjustment	relates to impairment losses which is not sub	ject to GST.		
statement	Due to the quan	tum of this amount, this adjustment has not b			
	or underlying trial relation to a reduc	mount was material, it can be assured directly aga balance accounts. The expense is recognised on ction in the asset's book value. The timing of entitl sition at the asset and there is no impact to GST o	the P&L statement in ement to GST credits is at		
Step 2	Expenses withou	ut GST in the price		(\$100)	•
Adjustments	Accounting treat	<u>tment</u>			
– P&L statement	•	consists of the following trial balance account of total expenses.	ts which have been		
	GST treatment				
	These amounts base.	are not subject to GST and should be elimina			
	Assurance proce	<u>edures</u>			
	The ATO's analy GST in its value	ysis of trial balance accounts confirms that the	ese items do not include		
	The ATO's analy	ysis has not identified other accounts to be in-	cluded in this adjustment.		
	Accordingly, we	have assigned a high level of assurance ove			
	Account Code	Description			
	2031	Entertainment Expenses (non-deductible)			
	2032	Fines and Penalties	2		
	2033	Fringe benefits tax	5		

	2034	Withholding tax	3			
	2035	Land rates	3			
	2036	Property tax and stamp duties	4			
	2037	Shipping costs	25			
	2038	Medical expenses	5			
	2039	Water	5			
	2040	Fuel Tax Credits	20			
	2041	Customs & Duty	10			
	2042	Stock Obsolescence	10			
	2043	Stock Revaluation	5			
Step 2	Depreciation an	nd Amortisation Expense		(\$50)	•	
Adjustments	Accounting trea	<u>tment</u>				
– P&L statement	This adjustment relates to the removal of depreciation and amortisation expenses from					
	GST treatment					
	The timing of entitlement to GST credits is at the point of acquisition at the asset and therefore no GST credits are attached to these expenses. Assurance procedures					
	The value of adjustment is consistent with "Depreciation and amortisation expenses" reported on the consolidated P&L statement.					
	Accordingly, we	have a high level of assurance over this adju				

Step 3	Cost of purchasing capital or fixed assets	\$70	•
Capital	Accounting treatment		
Adjustments	The gross value of assets purchased is not recorded on the P&L statement.		
	·		
	This adjustment refers to the gross value of assets purchased during the annual period and has been extracted from the Fixed Asset Register.		
	The value of the adjustment is consistent with the amount of payments for property, plant and equipment disclosed in the Consolidated Statement of Cash Flows and the annualised Label G10 reported on Business Activity Statements.		
	GST treatment		
	The acquisition of assets results in a creditable acquisition in which GST is claimed on the value of assets.		
	Assurance procedures		
	As explained in section 3 of the TAR, a sample of 30% of all capital transactions were analysed and assessed as correctly treated for GST purposes.		
	Accordingly, we have a high level of assurance over this adjustment.		
Step 3	Prepaid expenses	\$10	•
Adjustments	Accounting treatment		
Balancesheet	The advanced payment of annual insurance is initially capitalised on the balance sheet as an asset and is expensed into the P&L statement overtime.		
	GST treatment		
	The GST credits are claimed upon the initial payment of the insurance amount. Accordingly, the GST claimed is reflected in the closing balance on the balance sheet. Therefore, the movement between the closing and opening balance reflects the amount of GST credits claimed on prepayments which have not yet been reflected in the P&L statement.		

Assurance procedures

We have reconciled the \$10m amount to the difference between the opening and closing balances on the trial balance.

However, the taxpayer has disclosed that only a limited amount is related to taxable general insurance. The prepaid expense amount is undissected and includes payments of health insurance and life insurance which are GST-free and input taxed supplies respectively.

Accordingly, we have low assurance on this adjustment as there is no correlation between the balance sheet movement and the amount of GST credits claimed on prepayments.

Account Code	Description	2019	2018
0740	Prepaid Expenses	70	60

Step 3

Adjustments – Balance sheet

Timing adjustment – accrued expenses

Accounting treatment

This adjustment relates to accrued expense which have been incurred but not yet paid or no invoice received. The accrued expenses are recognised on the P&L statement.

GST treatment

As the invoice has yet to be received, GST is yet to be claimed on these amounts. The closing balance of the accruals account reflects expenses recognised on the P&L statement of which GST has yet to be claimed. For the 2019 financial year, the increasing adjustment is a result of the opening balance exceeding the closing balance. That is, GST credits were claimed on expenses in 2019 that were accrued in the previous year.

Assurance procedures

We have reconciled the \$90m amount of the adjustment to the difference between the opening and closing balances.

	However, the taxpayer has disclosed that the accruals also relate to GST-free expenses of which GST credits were not claimed. This would be impractical to quantify as it requires a transactional level analysis. Accordingly, we assigned a medium level of assurance for this adjustment.					
	Account Code					
	0743	Accrued Expenses	50	140		
Step 3	Timing adjustment	– difference between Co	st of Goods Sold and s	stock purchases	\$45	•
Adjustments – Balance	This adjustment is aimed at calculating the difference between Cost of Goods Sold (COGS) and actual purchases made throughout the year.					
sheet	Accounting treatment					
	inventory when the	ock and consumables are by are acquired throughou as part of COGS in the P&	ting purposes, they			
	GST treatment					
	The timing of the GST claim is at the acquisition date of these expenses. The movement between the closing and opening balance reflects the amount of GST credits claimed on these expenses which have not yet been reflected in the P&L statement.					
	Assurance procedu					
	This adjustment is consistent with the vendor report which shows approximately \$445m of stock purchases from regular suppliers of inventory and consumables compared to \$400m as per the Cost of Goods Sold (difference of \$45m).					
	Accordingly, we have a high level of assurance over this adjustment.					
	Account Code Do	escription	2019	2018		

	0500	Inventory	145	105		
		•				
	0501	Consumables	30	25		
Step 4	Rebates paid to	o customers			\$85	•
Other	Accounting trea	<u>tment</u>				
adjustments	Rebates has be	een offset against total revenue				
	GST treatment					
	As the taxpayer makes a decreasing GST adjustment and claims input tax credits, this requires an increase to the expense base to accord with GST reporting.					
	Assurance prod	<u>cedures</u>				
	As set out in section 3 of the TAR, a sample of 10% of rebates have been analysed which confirms that the taxpayer makes a decreasing GST adjustment by claiming input tax credits at Label 1B of the BAS. The rebates amount has been extracted from Account Code 0010. This also corresponds with the adjustment in relation to the GST payable analysis at section 5.2.					
	Accordingly, we	e have a high level of assurance				
	Account Code	Description		Amount		
	0010	Rebates paid to customers	3	85		
Final adjusted	d expense amou	\$705				
10% of Final adjusted expense amount					\$70.5	
Label 1B amount reported for the period					\$70	
Variance				\$.5		



Analysis - GST Payable

The application of the GAT has explained the variance between revenue and GST payable. For the 2019 financial year, the prima facie effective rate of 10.91% has been revised to an adjusted effective rate of 9.95% as a result of the adjustments provided.

For the review period, the major reasons for the variance included:

- Exports and GST-free sales of \$60m which are not subject to GST
- Disposal of assets of \$65m of which the gross value was not reflected in the P&L statement
- Deferred revenue of \$40m which have been recognised and billed for GST purposes but have not yet been recognised in the P&L statement
- Rebates paid to customers of \$85m which were offset against total revenue and triggered decreasing GST adjustments.

The remaining variance has not been linked to a particular adjustment and is likely related to timing differences between accounting and GST recognition that could only be quantified at the transactional level. It is \$0.5m and hence not material for GAT purposes.

Analysis - GST Claimed

The application of the GAT has explained the variance between expenses and GST claimable. For the 2019 financial year, the prima facie effective rate of 9.33% has been revised to an adjusted effective rate of 9.93% as a result of the adjustments provided.

For the review period, the major reasons for the variance included:

- Payroll expenses of \$150m which are not subject to GST
- Various expenses totalling \$100m which do not contain GST in the price
- Purchase of capital items totalling \$70m which have been supported by the Fixed Asset register
- Accrued expenses of \$90m which have been recognised for accounting purposes but have not yet been billed or paid
- Rebates paid to customers of \$85m which were offset against total revenue and triggered decreasing GST adjustments.

The remaining variance is linked to the accruals adjustments which contains a mix of taxable and non-GST bearing amounts. The breakdown of these accounts could only be quantified at the transactional level. As the amount is \$0.5m, it is immaterial for the purposes of applying the GAT.

Conclusions and Next Steps

As a result of applying the GAT, we understand why the accounting and GST results vary and this understanding is sufficiently supported by objective evidence. The prima facie effective rate of 26.66% has been revised to an adjusted effective rate of 10.00% as a result of the adjustments provided.

OFFICIAL EXTERNAL 22

The major adjustments have been assessed under other focus areas of the review and we have verified that these adjustments have been accurately reported for GST purposes.

This has resulted in a **Stage 3** rating for this focus area.

OFFICIAL EXTERNAL 23

Appendix A – GAT ratings

Understanding the alignment between accounting and GST

We analysed the various streams of economic activity and sought to understand how they are treated for GST purposes.

•	Stage 3	We understand and can explain the variance between accounting figures and the amounts reported on the BAS. As a result of applying the GAT, we understand why accounting and GST results vary and this understanding is sufficiently supported by objective evidence.
	Stage 2	Further analysis and explanation is required to understand the variances between accounting figures and the amounts reported on the BAS. As a result of applying the GAT, we do not fully understand why accounting and GST results vary and/or this understanding is not sufficiently supported by objective evidence.
•	Stage 1	We do not understand and cannot explain the variances between accounting figures and the amounts reported on the BAS.
R	Red flag	We identified concerns from our analysis of the variances between accounting figures and the amounts reported on the BAS.
NR	Not rated	We have not assessed the various streams of economic activity and/or why accounting and GST results vary using the GST analytical tool.

OFFICIAL EXTERNAL 24