Australian Government
Australian Taxation Office

Tailored approach to attaining, maintaining and refreshing GST assurance

Top 100 justified trust program
20 November 2025

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Tailored approach to attaining, maintaining and refreshing assurance across the various stages of the justified trust cycle for GST

The Top 100 GST assurance program seeks to provide assurance, through the justified trust methodology, that the Top 100 population is reporting and paying the right amount of GST in Australia:

- When aggregated, the focus areas for assurance should provide sufficient coverage of the Australian-linked economic activity undertaken by the taxpayer (as reported by its GST reporters).
- It may take multiple reviews for a reporter to attain assurance comprehensively across the 4 focus areas through the Top 100 justified trust program. Not all reporters will be on a pathway to an overall high level of assurance.
- Where there are areas of the reporter's business and economic activities that have not yet been assured, but we believe that assurance could and should still be attained with further analysis or supporting documentation (or both), this should be identified and documented in the future assurance plan in the GST assurance report. We will then undertake further work with the reporter in a subsequent period.

Alternatively, assurance can be attained through escalation (for example, specific review or audit) where the ATO and the reporter have a material difference in opinion in relation to the tax treatment.

Table 1: Tailored approach to attaining, maintaining and refreshing GST assurance

Focus area	Initial GST assurance review	Annual GST assurance review (low assurance reporters)	Monitoring and maintenance (overall high assurance and medium assurance reporters for 3 financial years between reviews)	Refresh review (all medium assurance reporters and certain high assurance reporters ineligible for an assurance check-in)	Assurance check-in (eligible high assurance reporters)
General approach to attaining, maintaining and refreshing assurance	The scope of our initial GST assurance review will be primarily directed towards obtaining sufficient objective evidence to support a comprehensive understanding of the whole of the reporter's business, including key risks and significant transactions. To attain overall high assurance (justified trust), a reporter must meet the following criteria: • a quantitative threshold of more than 90% tax assured and economic activity correctly reported, and • all 6 qualifying factors are satisfied (including	Once an initial GST assurance review has been completed, the scope of future engagement activities will shift focus towards areas where further assurance is required and to determine the nature of review activities and objective evidence required for the reporter to attain higher levels of assurance.	We take a monitoring and maintenance stance during the 3 years between assurance reviews. We will use our data and analytics capability to safeguard against non-disclosure or non-compliance. This can include profiling, and monitoring and analysis of disclosures, the Supplementary annual GST return (SAGR), information in the public domain (for example, Australian Securities Exchange announcements and media articles) and other information collected through the income tax pre-	Every fourth year we will 'refresh' our assurance. Our refresh review will be tailored based on a comprehensive understanding of the reporter's business across the 4 focus areas. The scope of this review will be informed by our profiling and have regard to the SAGR and disclosures made by the reporter. The refresh review entails positively confirming the extent to which the knowledge and information acquired during previous reviews remains relevant, such that over time we can continue to support our	From the 2024–25 financial year onwards, in lieu of a full refresh review, for eligible high assurance reporters, we will limit our engagement to an assurance check-in every fourth year and will predominantly rely on independent tax control testing results (that is, Board-level control 4 testing) and the alignment between accounting and tax to evidence and maintain assurance, supported by annual profiling. Where we identify material new transactions or GST risks (or both) we will seek

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	Stage 2 for governance indicating that tax governance is designed effectively). Our Future GST engagement after initial GST assurance review outlines in more detail our approach to the top 100 GST assurance process once an initial GST assurance review has been completed.		lodgment compliance review. Information on the real-time disclosures we expect from reporters and how we will action these is available in Top 100 Pre-lodgment disclosure framework. We may conduct targeted assurance activities on an exception basis. The nature of these activities may involve asking GST questions in the pre-lodgment compliance review, the commencement of a specific GST review, or an audit to address specific GST risks.	assurance rating and, where necessary, obtain contemporaneous documentation and workpapers.	to attain assurance as part of the assurance check-in, leveraging to the extent possible prior assurances.
Focus area 1 – tax governance framework	We will review objective evidence against the requirements in the GST Governance, Data Testing	We will review objective evidence against the GST Guide where a minimum Stage 2 rating is yet to be attained, including changes to governance to address	We will review governance documentation where provided to us to address our recommendations, including updated documentation to address	Our review will be limited to: • independent tax control testing results (where available and not already reviewed)	Our review will be limited to: • independent tax control testing results (where available and not already reviewed)

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	and Transaction Testing Guide (GST Guide).	identified design gaps or enhancements.	design gaps and provisional ratings as well as independent tax control testing results.	• evidence to support an unqualified Stage 2 rating (where not already reviewed) • changes to the design of the GST governance framework (for example, new software systems or significant acquisitions) • evidence to address identified design gaps or design enhancement recommendations • the impact of any other focus area on the tax governance framework (for example, understanding the reasons for errors, any amended assessments and the implications for governance and controls).	• evidence to support a provisional to unqualified Stage 2 rating (where not already reviewed). We may request contemporaneous governance documents.

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Focus area 2 – tax risks flagged to market	We will comprehensively review all tax risks flagged to market (TRFM).	We will attain assurance over new TRFM. We will confirm that our assurance can be maintained over existing TRFM that are rated high or medium assurance with no further action from prior reviews. We will do further work to increase our assurance over existing TRFM with the ultimate objective that any TRFM are rated at a high or medium level of assurance with no further action proposed. We will consider attaining assurance through escalation (for example, specific review or audit) where the ATO and the reporter have a material difference in opinion in	We will monitor and engage with a reporter if we detect a possible material risk that requires further investigation or review.	The intensity of our review will vary depending on whether the reporter is at high or medium assurance and the extent to which we can leverage from prior knowledge. We will attain assurance over new TRFM. We will confirm that our assurance can be maintained over existing TRFM that are rated at least high or medium assurance with no further action from prior reviews. We will do further work to increase our assurance over existing TRFM with the ultimate objective that any TRFM are rated at a high or medium level of assurance with no further action proposed.	Where we identify new TRFM we will seek to attain assurance as part of the assurance check-in, leveraging to the extent possible prior assurances.

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		relation to the tax treatment.			
Focus area 3 – significant and new transactions and specific issues	We will comprehensively review all significant transactions and specific issues. We will perform data and transaction testing (typically over a 3-month period) to attain assurance over correct reporting.	We will attain assurance over significant new transactions. We will confirm that our assurance can be maintained over existing GST risks that are rated at least high or medium assurance with no further action from prior reviews. We will do further work to increase assurance over existing significant transactions to attain a high or medium level of assurance over significant transactions with no further action proposed. Data and transaction testing will be undertaken. We will take a holistic and tailored approach in determining the	We will monitor and engage with a reporter if we detect a possible material risk that requires further investigation or review.	The intensity of our review will vary depending on whether the reporter is at high or medium assurance and the extent to which we can leverage from prior knowledge. We will attain assurance over significant new transactions and new specific issues. We will confirm that our assurance can be maintained over existing GST risks that are rated at least high or medium assurance with no further action from prior reviews. We may seek to increase assurance over existing significant transactions and specific issues that are	Where we identify significant new transactions, we may seek to attain assurance as part of the assurance check-in, leveraging to the extent possible from prior assurances. We will not perform the following activities: • data and transaction testing • review of business activity statements (BAS) and working papers • systems walk-throughs • request information in relation to significant ongoing transactions and specific risks that

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		intensity applied to both data and transaction testing.		rated low or medium assurance with further action. Data and transaction testing may be undertaken. We will take a holistic and tailored approach in determining the intensity applied to both data and transaction testing.	have previously been assured.
Focus area 4 – alignment between accounting and tax	We will comprehensively review the reporter's reconciliation between its financial statements and GST reported in the BAS or assist the reporter to prepare one. We expect that this reconciliation is conducted utilising the GST analytical tool guidance (GAT Methodology). Where a reporter wishes to	We will comprehensively review the reporter's reconciliation between its financial statements and GST reported in the BAS. We expect that this reconciliation is conducted using the GAT Methodology (unless an alternative methodology has been agreed to with us). If the GAT for the assurance review is not completed	We will not review the GAT. Note that the SAGR includes questions about whether this reconciliation has been undertaken and the outcomes.[1] We consider it best practice that all reporters (except those whose business is predominantly input taxed) will implement and have documented procedures for	We will review GAT workbooks, and to the extent we cannot leverage from prior assurance, may request supporting objective evidence of new GAT adjustments. We expect that this reconciliation is conducted utilising the GAT Methodology (unless an alternative methodology	The assurance check-in is available to eligible high assurance reporters who have undertaken a reconciliation between their financial statements and GST reported in the BAS for the review period using the GAT, or a similar reconciliation if previously reviewed and assured by the ATO.

[1] Refer to our supplementary annual GST return instructions, Section D: Reconciliation between audited financial statements and Business Activity Statements (QC 103046).

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	undertake a similar or alternate reconciliation to the GST analytical tool (GAT), this must be worked through with us, and agreed to, prior to finalisation of the initial review.	prior to lodgment of the relevant SAGR, we will request that the reporter complete the GAT. Where insufficient information and objective evidence exists to complete the GAT, we may undertake further assurance work in other focus areas.	an annual reconciliation process between their financial statements and BAS, as per the GST Guide. However, inclusion of this question in the SAGR does not in and of itself create an obligation for reporters to have completed the GAT in the monitoring and maintenance period.	has been agreed to with us). If the GAT for the refresh review year is not completed prior to lodgment of the relevant SAGR, we will request that the reporter complete the GAT. Where insufficient information and objective evidence exists to complete the GAT, we may undertake additional assurance work in other focus areas.	The reconciliation must be conducted prior to the lodgment of the SAGR for the review period. We will review GAT workbooks, and to the extent we cannot leverage from prior assurance, may request supporting objective evidence of new GAT adjustments.

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