



Australian Government
Australian Taxation Office

International dealings schedule

2015

WHEN COMPLETING THIS FORM

Print clearly in BLOCK LETTERS using a black pen only.

S M I T H S T

Place X in ALL applicable boxes.

HOW TO COMPLETE THIS FORM

For explanations and instructions on how to complete this schedule, refer to the International dealings schedule - instructions 2015, available from our website at ato.gov.au

^XXX

1 This schedule forms part of the tax return of:

Name of entity

Name of entity grid

Tax file number

Australian business number (ABN)

Section A: International related party dealings

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

A No [ ] Go to question 17 Yes [^JLJ]

3 Did you have dealings with international related parties, apart from the dealings with related parties located in specified countries?

A No [^JLK] Yes [ ] Provide the following information for the three countries with the highest dollar value of related party dealings.



Table with columns: Foreign country, Activity code, Expenditure, Revenue. Rows include B, C, G, H, I, J, K, L, M, N, O, P, Q, R, S.

**4 Did you have dealings with international related parties located in specified countries?**

A No  **^JMD** Yes  Provide the following information for the three specified countries with the highest dollar value of related party dealings.

Specified country	Activity code	Expenditure	Revenue
B <input checked="" type="checkbox"/> <b>^JME</b>	C <input checked="" type="checkbox"/> <b>^JMF</b>	D \$ <input checked="" type="checkbox"/> <b>^JMG</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E \$ <input checked="" type="checkbox"/> <b>^JMH</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	C <input type="checkbox"/>	D \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	C <input type="checkbox"/>	D \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
All other amounts		F \$ <input checked="" type="checkbox"/> <b>^JMI</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	G \$ <input checked="" type="checkbox"/> <b>^JMJ</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
H <input checked="" type="checkbox"/> <b>^JMK</b>	I <input checked="" type="checkbox"/> <b>^JML</b>	J \$ <input checked="" type="checkbox"/> <b>^JMM</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	K \$ <input checked="" type="checkbox"/> <b>^JMN</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	I <input type="checkbox"/>	J \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	K \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	I <input type="checkbox"/>	J \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	K \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
All other amounts		L \$ <input checked="" type="checkbox"/> <b>^JMO</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	M \$ <input checked="" type="checkbox"/> <b>^JMP</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
N <input checked="" type="checkbox"/> <b>^JMQ</b>	O <input checked="" type="checkbox"/> <b>^JMR</b>	P \$ <input checked="" type="checkbox"/> <b>^JMS</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	Q \$ <input checked="" type="checkbox"/> <b>^JMT</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	O <input type="checkbox"/>	P \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	Q \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
	O <input type="checkbox"/>	P \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	Q \$ <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X
All other amounts		R \$ <input checked="" type="checkbox"/> <b>^JMU</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	S \$ <input checked="" type="checkbox"/> <b>^JMV</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X

**5 Did you have any international related party dealings involving tangible property of a revenue nature, including trading stock and raw materials?**

A No  **^JMW** Yes  Provide the following information

**Tangible property of a revenue nature including trading stock and raw materials**

Expenditure	Revenue	Main pricing methodology	Percentage of dealings with documentation code
C \$ <input checked="" type="checkbox"/> <b>^JMX</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	D \$ <input checked="" type="checkbox"/> <b>^JMY</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E <input checked="" type="checkbox"/> <b>^JMZ</b>	F <input checked="" type="checkbox"/> <b>^JNA</b>

**6 Did you have any international related party dealings involving royalties or licence fees?**

A No  **^JNB** Yes  Provide the following information

**6a Royalties**

Deductions	Income	Main pricing methodology	Percentage of dealings with documentation code
C \$ <input checked="" type="checkbox"/> <b>^JNC</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	D \$ <input checked="" type="checkbox"/> <b>^JND</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E <input checked="" type="checkbox"/> <b>^JNE</b>	F <input checked="" type="checkbox"/> <b>^JNF</b>

**6b Licence fees**

Deductions	Income	Main pricing methodology	Percentage of dealings with documentation code
C \$ <input checked="" type="checkbox"/> <b>^JNG</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	D \$ <input checked="" type="checkbox"/> <b>^JNH</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E <input checked="" type="checkbox"/> <b>^JNI</b>	F <input checked="" type="checkbox"/> <b>^JNJ</b>

**7 Did you have any international related party dealings involving rent or leasing?**

A No  **^JNK** Yes  Provide the following information

**Rent/leasing**

Expenditure	Revenue	Main pricing methodology	Percentage of dealings with documentation code
C \$ <input checked="" type="checkbox"/> <b>^JNL</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	D \$ <input checked="" type="checkbox"/> <b>^JNM</b> <input type="text"/> , <input type="text"/> , <input type="text"/> , <input type="text"/> ·X	E <input checked="" type="checkbox"/> <b>^JNN</b>	F <input checked="" type="checkbox"/> <b>^JNO</b>



**9 Did you have any derivative transactions with international related parties?**

A No  **^JPJ** Yes  Provide the following information

**9a Derivatives**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JPK</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JPL</b>	<input checked="" type="checkbox"/> <b>^JPM</b>	F <input checked="" type="checkbox"/> <b>^JPN</b>

**9b Principal derivative types**

	Derivative code	Derivative code	Derivative code
G1	<input checked="" type="checkbox"/> <b>^JPO</b>	G2 <input checked="" type="checkbox"/> <b>^JPO</b>	G3 <input checked="" type="checkbox"/> <b>^JPO</b>

**9c Did you engage in the trading of derivatives globally through a trading structure in which you shared global profits from these activities with international related parties?**

H No  **^JPP** Yes

**10 Did you enter into any debt factoring or securitisation arrangements with international related parties?**

A No  **^JPQ** Yes  Provide the following information

**10a Debt factoring**

	Book value		Consideration		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JPR</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JPS</b>	<input checked="" type="checkbox"/> <b>^JPT</b>	F <input checked="" type="checkbox"/> <b>^JPU</b>

**10b Securitisation**

	Book value		Consideration		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JPV</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JPW</b>	<input checked="" type="checkbox"/> <b>^JPX</b>	F <input checked="" type="checkbox"/> <b>^JPY</b>

**11 Did you have any dealings of a financial nature other than those listed in Questions 9 and 10 with international related parties?**

A No  **^JPZ** Yes  Provide the following information

	Interest bearing loans – Average balance		Interest free loans – Average balance
11a Amounts borrowed	I \$ <input checked="" type="checkbox"/> <b>^JQA</b>	<input type="checkbox"/>	K \$ <input checked="" type="checkbox"/> <b>^JQB</b>

11b Amounts loaned	I \$ <input checked="" type="checkbox"/> <b>^JQC</b>	<input type="checkbox"/>	K \$ <input checked="" type="checkbox"/> <b>^JQD</b>
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**11c Interest**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JQE</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JQF</b>	<input checked="" type="checkbox"/> <b>^JQG</b>	F <input checked="" type="checkbox"/> <b>^JQH</b>

**11d Guarantees**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JQI</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JQJ</b>	<input checked="" type="checkbox"/> <b>^JQK</b>	F <input checked="" type="checkbox"/> <b>^JQL</b>

**11e Insurance**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JQM</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JQN</b>	<input checked="" type="checkbox"/> <b>^JQO</b>	F <input checked="" type="checkbox"/> <b>^JQP</b>

**11f Reinsurance**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JQQ</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JQR</b>	<input checked="" type="checkbox"/> <b>^JQS</b>	F <input checked="" type="checkbox"/> <b>^JQT</b>

**11g Other financial dealings (specify in label H below)**

	Expenditure		Revenue		Main pricing methodology	Percentage of dealings with documentation code
C \$	<input checked="" type="checkbox"/> <b>^JQU</b>	<input type="checkbox"/>	D \$	<input checked="" type="checkbox"/> <b>^JQV</b>	<input checked="" type="checkbox"/> <b>^JQW</b>	F <input checked="" type="checkbox"/> <b>^JQX</b>

H  **^JQY**

**12 Did you have any other international related party dealings of a revenue nature not reported at questions 5 to 11?**

A No  **^JQZ** Yes  Provide the following information

Other (specify in label H below)

Expenditure		Revenue		Main pricing methodology		Percentage of dealings with documentation code	
C \$	<input checked="" type="checkbox"/> <b>^JRA</b>	D \$	<input checked="" type="checkbox"/> <b>^JRB</b>	E	<input checked="" type="checkbox"/> <b>^JRC</b>	F	<input checked="" type="checkbox"/> <b>^JRD</b>
Description							
H <input checked="" type="checkbox"/> <b>^JRE</b>							

**13 Did you dispose of or acquire any tangible/intangible property of a non-revenue (capital) nature to or from international related parties not reported at questions 5 to 11?**

A No  **^JRF** Yes  Provide the following information

**13a Tangible property**

Consideration paid		Consideration received		Main capital asset pricing methodology		Percentage of dealings with documentation code	
C \$	<input checked="" type="checkbox"/> <b>^JRG</b>	D \$	<input checked="" type="checkbox"/> <b>^JRH</b>	G	<input checked="" type="checkbox"/> <b>^JRI</b>	F	<input checked="" type="checkbox"/> <b>^JRJ</b>

**13b Intangible property**

Consideration paid		Consideration received		Main capital asset pricing methodology		Percentage of dealings with documentation code	
C \$	<input checked="" type="checkbox"/> <b>^JRK</b>	D \$	<input checked="" type="checkbox"/> <b>^JRL</b>	G	<input checked="" type="checkbox"/> <b>^JRM</b>	F	<input checked="" type="checkbox"/> <b>^JRN</b>

**14 Did you provide any of the following for no payment or a non-monetary payment, or receive any of the following for a non-monetary payment to/from an international related party?**

- services
- assets
- liabilities
- property – tangible or intangible (eg. intellectual property)
- processes
- rights or obligations.

A No  **^JRO** Yes  Provide the following information (where applicable)

	Capital		Revenue	
	Foreign country	Nature of item	Foreign country	Nature of item
14a No payment	B <input checked="" type="checkbox"/> <b>^JRP</b>	C <input checked="" type="checkbox"/> <b>^JRQ</b>	D <input checked="" type="checkbox"/> <b>^JRR</b>	E <input checked="" type="checkbox"/> <b>^JRS</b>
14b Non-monetary payment	B <input checked="" type="checkbox"/> <b>^JRT</b>	C <input checked="" type="checkbox"/> <b>^JRU</b>	D <input checked="" type="checkbox"/> <b>^JRV</b>	E <input checked="" type="checkbox"/> <b>^JRW</b>



**15 Did you provide or receive share-based employee remuneration to or from an international related party?**

A No  **^JRX** Yes  Provide the following information for any international related party recharge amounts you provided or received as part of those arrangements.

Recharge amounts		Deductions		Income	
C \$	<input checked="" type="checkbox"/> <b>^JRY</b>	D \$	<input checked="" type="checkbox"/> <b>^JRZ</b>		

**16 Were you a party to a cost contribution arrangement for developing, producing or obtaining assets or rights with an international related party?**

A No  **^JSA** Yes

**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  **^JSB**

**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	Percentage of dealings with documentation code
C <input type="checkbox"/> <b>^JSC</b>	D <input type="checkbox"/> <b>^JSD</b>	E <input type="checkbox"/> <b>^JSE</b>	G <input type="checkbox"/> <b>^JSF</b>	F <input type="checkbox"/> <b>^JSG</b>
Description				
H <input type="checkbox"/> <b>^JSH</b>				

Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?

I No  **^JSI** Yes

*Restructuring event 2*

Entity or branch	Capital value	Appendix 7 code	Foreign country	Percentage of dealings with documentation code
C <input type="checkbox"/> <b>^JSC</b>	D <input type="checkbox"/> <b>^JSD</b>	E <input type="checkbox"/> <b>^JSE</b>	G <input type="checkbox"/> <b>^JSF</b>	F <input type="checkbox"/> <b>^JSG</b>
Description				
H <input type="checkbox"/> <b>^JSH</b>				

Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?

I No  **^JSI** Yes

*Restructuring event 3*

Entity or branch	Capital value	Appendix 7 code	Foreign country	Percentage of dealings with documentation code
C <input type="checkbox"/> <b>^JSC</b>	D <input type="checkbox"/> <b>^JSD</b>	E <input type="checkbox"/> <b>^JSE</b>	G <input type="checkbox"/> <b>^JSF</b>	F <input type="checkbox"/> <b>^JSG</b>
Description				
H <input type="checkbox"/> <b>^JSH</b>				

Was there a contemporaneous professional valuation study or transfer pricing analysis of the restructuring event undertaken?

I No  **^JSI** Yes

**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  **^JSJ** Yes



Section C: **Interests in foreign entities**

**21 Did you have any interests in controlled foreign companies (CFCs) or controlled foreign trusts (CFTs)?**

A No  Go to question 24 **^JTI**

Yes  Specify the number of CFCs and CFTs which you had an interest in at the end of your income year.

	Listed countries	Specified countries	Other unlisted countries
Number of CFCs and CFTs	B <b>^JTJ</b> <input type="text"/>	C <b>^JTK</b> <input type="text"/>	D <b>^JTL</b> <input type="text"/>

**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 \$ **^JTM** , , , .X

Specified countries B \$ **^JTN** , , , .X

Other unlisted countries C \$ **^JTO** , , , .X

Total D \$ **^JTP** , , , .X

**Section 457 – CFCs change of residence**

E \$ **^JTQ** , , , .X

**Section 459A – CFCs / CFTs and interposed Australian entities**

F \$ **^JTR** , , , .X

**23 Did you have a CFC that was a resident of an unlisted country that provided a benefit (as defined in section 47A of the ITAA 1936), either directly or indirectly, to you or any of your related entities at any time during the income year?**

A No **^JTS** Yes

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

A No  Go to question 27 **^JTT**

Yes  Specify the amount of foreign income you derived that is non-assessable under the following sections of the ITAA 1936.

**24a Section 23AH – foreign branch income of Australian companies**

Listed countries B \$ **^JTU** , , , .X

Specified countries C \$ **^JTV** , , , .X

Other unlisted countries D \$ **^JTW** , , , .X

**24b Non deductible expenses incurred in deriving section 23AH non-assessable income**

E \$ **^JTX** , , , .X

**24c Section 23AI – amounts paid out of attributed CFC income**

Listed countries B \$ **^JTY** , , , .X

Specified countries C \$ **^JTZ** , , , .X

Other unlisted countries D \$ **^JUA** , , , .X

**24d Section 23AJ – non-portfolio dividends from foreign companies**

B \$ **^JUB** , , , .X

C \$ **^JUC** , , , .X

D \$ **^JUD** , , , .X

Total foreign non-assessable income (ELS Validation purpose only) **^JUE**









