



## WHEN COMPLETING THIS FORM

- Print clearly in BLOCK LETTERS using a black pen only.

S M I T H S T

- Place  $\chi$  in ALL applicable boxes.

X

## 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](http://ato.gov.au)

 $\wedge XXX$ 

**1 This schedule forms part of the tax return of:**

Name of entity

[illegible]

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 

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

- A** No ☒ **JKL** Yes ☐ Provide the following information for the three countries with the highest dollar value of related party dealings.

Foreign country	Activity code	Expenditure	Revenue
B <b>^JLL</b>	C <b>^JLM</b>	D \$ <b>^JLN</b> , , , . <del>X</del>	E \$ <b>^JLO</b> , , , . <del>X</del>
	C , ,	D \$ , , , . <del>X</del>	E \$ , , , . <del>X</del>
	C , ,	D \$ , , , . <del>X</del>	E \$ , , , . <del>X</del>
All other amounts		F \$ <b>^JLP</b> , , , . <del>X</del>	G \$ <b>^JLQ</b> , , , . <del>X</del>
H <b>^JLR</b>	I <b>^JLS</b>	J \$ <b>^JLT</b> , , , . <del>X</del>	K \$ <b>^JLU</b> , , , . <del>X</del>
	I , ,	J \$ , , , . <del>X</del>	K \$ , , , . <del>X</del>
	I , ,	J \$ , , , . <del>X</del>	K \$ , , , . <del>X</del>
All other amounts		L \$ <b>^JLV</b> , , , . <del>X</del>	M \$ <b>^JLW</b> , , , . <del>X</del>
N <b>^JLX</b>	O <b>^JLY</b>	P \$ <b>^JLZ</b> , , , . <del>X</del>	Q \$ <b>^JMA</b> , , , . <del>X</del>
	O , ,	P \$ , , , . <del>X</del>	Q \$ , , , . <del>X</del>
	O , ,	P \$ , , , . <del>X</del>	Q \$ , , , . <del>X</del>
All other amounts		R \$ <b>^JMB</b> , , , . <del>X</del>	S \$ <b>^JMC</b> , , , . <del>X</del>



## 4

A No  $\wedge$  JMD

Yes ☐

Pr  
th

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

## 5

A No ^JMW

Yes ☐

Pr

## Tangible prope

C \$ ^JMX [ ][ ][ ][ ][ ][ ][ ][ ] .X D \$ ^JMY [ ][ ][ ][ ][ ][ ][ ][ ] .X E ^JMZ F ^JNA

## 6

A No **^JNB**

Yes ☐

Pr

## 6a

**C** \$ **JNC** [ ] [ ] , [ ] [ ] , [ ] [ ] . -X **D** \$ **JND** [ ] [ ] , [ ] [ ] , [ ] [ ] . -X **E** **JNE** **F** **JNF**

## 6b

**C** \$ **^JNG** [ ][ ][ ][ ][ ][ ][ ][ ] .~~X~~ **D** \$ **^JNH** [ ][ ][ ][ ][ ][ ][ ][ ] .~~X~~ **E** **^JNI** **F** **^JNJ**

## 7

A No **^JNK**

Yes ☐

Pi

## Rent/leasing

	Expenditure		Revenue		Main pricing methodology	documentation code
C \$	<input type="text" value="JNL"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	.	D \$	<input type="text" value="JNM"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	E <input type="text" value="JNN"/>	F <input type="text" value="JNO"/>



**A** No ☒ Yes ☐ Provide the following information

	Expenditure		Revenue		main pricing methodology	documentation code
C \$	<input type="text" value="^JPK"/>	<input type="text"/>	D \$	<input type="text" value="^JPL"/>	E <input type="text" value="^JPM"/>	F <input type="text" value="^JPN"/>

Derivative code

G1 **^JPO**

Derivative code

G2 **^JPO**

Derivative code

G3 **^JPO**

H No **^JPP** Yes

**A** No ☒ **JPQ** Yes ☐ Provide the following information

C \$ ^JPR . . . . . D \$ ^JPS . . . . . E ^JPT F ^JPU

Book value Consideration Main pricing methodology documentation code  
 C \$ **^JPV** D \$ **^JPW** E **^JPX** F **^JPY**

**A** No ☒ **JPZ** Yes ☐ Provide the following information

11a Amounts borrowed Interest bearing loans – Average balance Interest free loans – Average balance

**11b Amounts loaned**

**C** \$ **^JQE** [ ][ ] , [ ][ ] , [ ][ ] . -X **D** \$ **^JQF** [ ][ ] , [ ][ ] , [ ][ ] . -X **E** **^JQG** **F** **^JQH**

	Expenditure										Revenue										Main pricing methodology		documentation code	
C \$	^JQI									-X	D \$	^JQJ									-X	E ^JQK	F ^JQL	

Expenditure										Revenue										Main pricing methodology										documentation code									
C	\$	^JQM								·	×	D	\$	^JQN							·	×	E	^JQO							F	^JQP							

Expenditure Revenue Main pricing methodology documentation code  
 C \$ ^JQQ . . . . . D \$ ^JQR . . . . . E ^JQS F ^JQT

Expenditure Revenue Main pricing methodology documentation code  
 C \$ ^JQU . . . . . D \$ ^JQV . . . . . E ^JQW F ^JQX

Description	
H	^JQY

**A** No ☒ **JQZ** Yes ☐ Provide the following information

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

**F** **^JRJ**

**F** ^JRN

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

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

E ^JRS

E ^JRW

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

D \$ ^JRZ , , , . X

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 <b>^JSC</b>	D <b>^JSD</b>	E <b>^JSE</b>	G <b>^JSF</b>	F <b>^JSG</b>
Description				
H <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 <b>^JSC</b>	D <b>^JSD</b>	E <b>^JSE</b>	G <b>^JSF</b>	F <b>^JSG</b>
Description				
H <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 <b>^JSC</b>	D <b>^JSD</b>	E <b>^JSE</b>	G <b>^JSF</b>	F <b>^JSG</b>
Description				
H <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 ☐

**A** No ☒ JSK Yes ☐ Provide the following information



[illegible]

Description of amounts claimed/returned

**!** 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.

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**A** No  Yes ☐ Provide the following information

**A** No  Yes  Specify which tax timing method elections you have made.

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**A** No ☒ **JUF** Yes ☐ Specify the total amount of debt deductions claimed under s25-90 or 230-15(3) ITAA 1997.

B \$ ^JUG , , , , , . X

**A** No ☒ **JUH** Yes ☐ Specify the total amount of the capital gains/losses made in respect of interests in foreign companies and the amounts of any reductions made pursuant to subdivision 768-G of the ITAA 1997.

**Capital loss reductions** E \$ JUL . X

**A** No ☐ **JUM** Yes ☐ Provide the following information for the three transfers with the highest dollar value.

Transfer 3    B \$ ^JUN    .    C ^JUN

A No **^JUP** Yes

**A** No ☒ Yes ☐ Provide the following information

Total amount of your share of net income/profit C \$

**A** No ☐ Go to question 40 Yes ☒ **JUT**

**A** No ☒ Yes ☐ Provide the ABN of the entity making that election, then go to question 40.

Australian business number (ABN) B ^JUV Go to question 40

A Code **^JW**

A No **^JUX** Yes

**34 What method did you use to calculate your average values?**A Code **^JUY****35 General information – to be completed by all thin capitalisation entities**Debt deductions A \$ **^JUZ** , , , , , .XDebt deductions on debt from related non-residents B \$ **^JVA** , , , , , .XAmount of debt deduction disallowed C \$ **^JVB** , , , , , .XAdjusted average debt D \$ **^JVC** , , , , , .X**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.

A No **^JVD** Yes ☐ Provide the following information where applicable**All ADI entities**

(Adjusted) average equity capital

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

Safe harbour capital amount

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

Equity capital shortfall amount

D \$ **^JVG** , , , , , .X**Outward investing ADI**

Average value of risk weighted assets

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

Equity capital attributable to overseas permanent establishment(s)

F \$ **^JVI** , , , , , .X**Outward investing ADI – continued**

Average value of risk weighted assets attributable to overseas permanent establishment(s)

G \$ **^JVJ** , , , , , .X

Average value of controlled foreign entity equity

H \$ **^JVK** , , , , , .X

Tier 1 prudential capital deductions

I \$ **^JVL** , , , , , .X**Inward investing ADI**

Average of risk weighted assets attributable to Australian permanent establishment(s)

J \$ **^JVM** , , , , , .X

Average value of donation capital

K \$ **^JVN** , , , , , .X**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 or 6 at Question 32, label A.

A No **^JVO** Yes ☐ Provide the following information where applicable**All non-ADI entities**

Average value of assets

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

Asset revaluation amount for thin capitalisation purposes

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

Safe harbour debt amount

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

Excess debt amount

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

Average value of non-debt liabilities

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

Average value of associate entity debt

G \$ **^JVU** , , , , , .X

Average value of associate entity equity

H \$ **^JVV** , , , , , .X**All non-ADI entities – continued**

Average value of associate entity excess amount

I \$ **^JVV** , , , , , .X

Average value of excluded equity interests

J \$ **^JVX** , , , , , .X**Financial entity**

Average zero capital amount

K \$ **^JVV** , , , , , .X

Average on-lent amount

L \$ **^JVZ** , , , , , .X**Outward investing entity**

Average value of controlled foreign entity equity

M \$ **^JWA** , , , , , .X

Average value of controlled foreign entity debt

N \$ **^JWB** , , , , , .X**38 Did you rely on arm's length tests?**A No **^JWC** Yes ☐ Provide your arm's length debt (non-ADI) or capital (ADI) amountB \$ **^JWD** , , , , , .X

**39 Did you rely on worldwide gearing debt/capital tests?**A No ☒ **JWE** Yes ☐ Provide the following information where applicable**ADI**

Worldwide group capital ratio

B  **JWF**    

Worldwide capital amount

C \$ **JWG**         **Non-ADI**

Worldwide debt

D \$ **JWH**         

Worldwide equity

E \$ **JWI**         

Worldwide gearing debt amount

F \$ **JWJ**         **Section E: Financial Services Entities****40 Are you a foreign bank or other qualifying financial entity that has not elected out of Part IIIB of the ITAA 1936?**A No ☒ **JWK** Yes ☐ Provide the following information

Average quarterly notional amount taken to be borrowed under section 160ZZZ

B \$ **JWL**         

Notional amount of interest taken to be paid under section 160ZZZA (excluding amounts attributable to OB activities of offshore banking units (OBUs))

C \$ **JWM**         

Notional amount of interest taken to be paid under section 160ZZZA attributable to OB activities of OBUs

D \$ **JWN**         

Amount of section 160ZZZJ withholding tax paid on notional interest amount

E \$ **JWO**         **41 Were you an offshore banking unit (OBU) or the head company of a consolidated group that included an OBU?**A No ☒ **JWP** Yes ☐ Provide the following information**41a Borrowing**

Assessable OB income

B \$ **JWQ**         

Net OB income/loss

C \$ **JWR**          / 

Assessable OB income from related parties

D \$ **JWS**         **41b Lending**

Assessable OB income

B \$ **JWT**         

Net OB income/loss

C \$ **JWU**          / 

Assessable OB income from related parties

D \$ **JWV**         **41c Guarantee-type**

Assessable OB income

B \$ **JWW**         

Net OB income/loss

C \$ **JWX**          / 

Assessable OB income from related parties

D \$ **JWY**         **41d Trading**

Assessable OB income

B \$ **JWZ**         

Net OB income/loss

C \$ **JXA**          / 

Assessable OB income from related parties

D \$ **JXB**         **41e Eligible contract**

Assessable OB income

B \$ **JXC**         

Net OB income/loss

C \$ **JXD**          / 

Assessable OB income from related parties

D \$ **JXE**         **41f Investment**

Assessable OB income

B \$ **JXF**         

Net OB income/loss

C \$ **JXG**          / 

Assessable OB income from related parties

D \$ **JXH**

Assessable OB income from related parties

D \$ ^JXX , , , , . X

Assessable OB income from related parties

D \$ ^JXN [ ][ ][ ][ ][ ][ ][ ][ ]-X

Assessable OB income from related parties

D \$ ^JXQ [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] . X

C \$ ^JXR , , , .

Assessable OB income from related parties

D \$ ^JYA [ ][ ][ ][ ][ ][ ][ ] . X

E\$ ^JYB , , , .

