

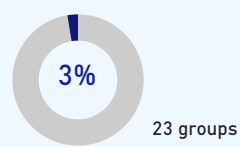
# International Questionnaire

## 2024 income year summary

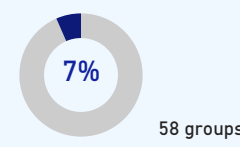
**885** foreign-owned groups  
(banks and insurers excluded)  
**100%** response rate

Out of **885** how many responded **YES** to...

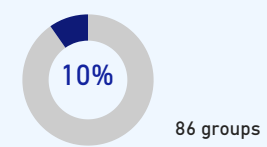
Material structural changes that resulted in reduction of functions/assets/risks of NZ operations



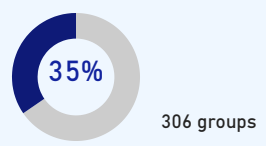
NZ group aggregate amount of expenditure on goods and/or services over \$30 million NRAP transactions in any of HK, IE, LU, NL, SG or CH



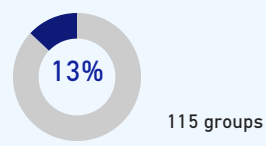
Profitability of the New Zealand group impacted adversely in the 2024 income year by abnormal business conditions or events



Cross-border supplies from related parties >20% of Gross Revenue

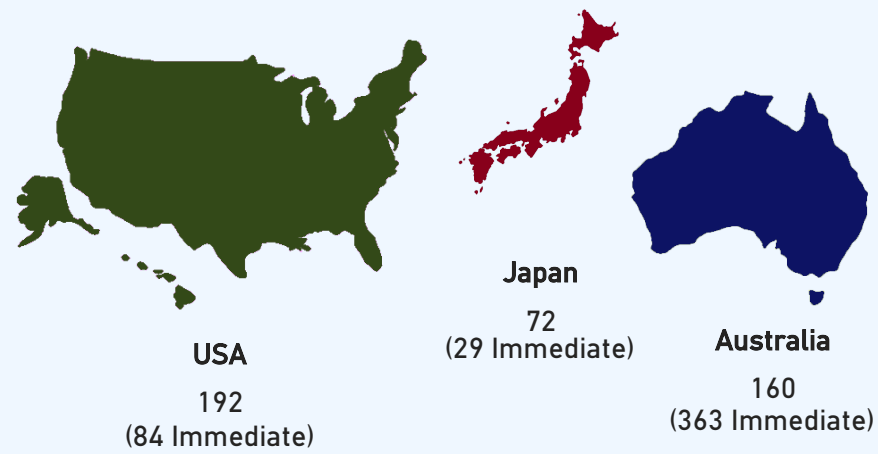


Cross-border supplies to related parties >20% of Gross Revenue



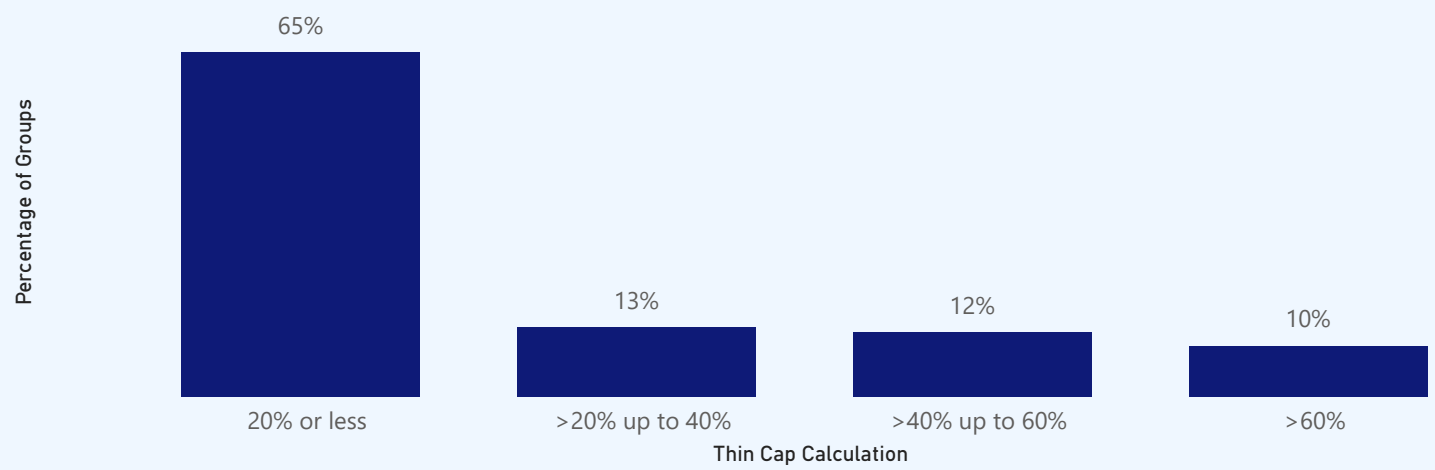
### Highest Ultimate Ownership

(excl. Foreign Syndicates)

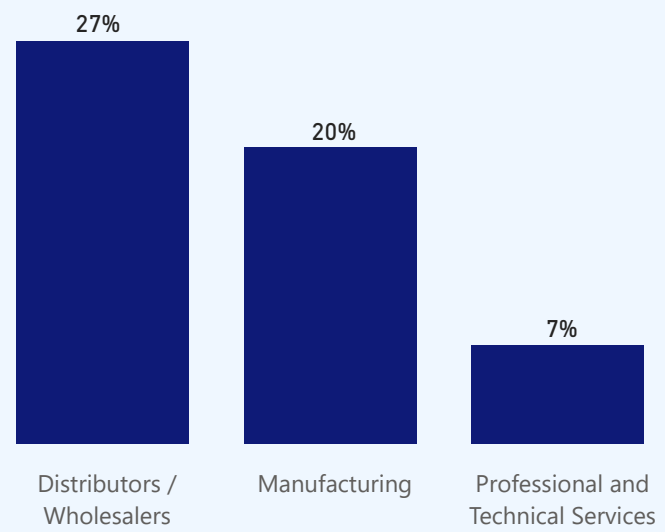


### Distribution of Groups: Thin Capitalisation Calculation

(excl Financial Services)



### Largest Industries



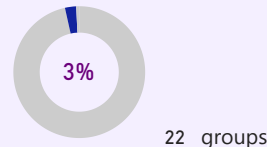
# International Questionnaire

## 2023 income year summary

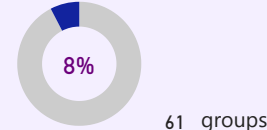
802 foreign-owned groups  
(banks and insurers excluded)  
100% response rate

Out of 802 how many responded YES to...

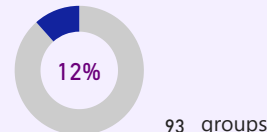
Material structural changes that resulted in reduction of functions, assets risks of NZ operations



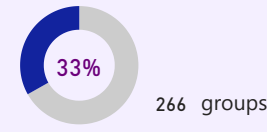
NZ group aggregate amount of expenditure on goods and/or services over \$30 million NRAP transactions in any of HK, IE, LU, NL, SG or CH



Cross-border supplies to related parties >20% of Gross Revenue

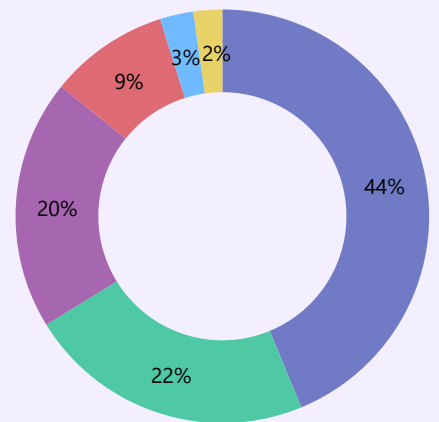


Cross-border supplies from related parties >20% of Gross Revenue



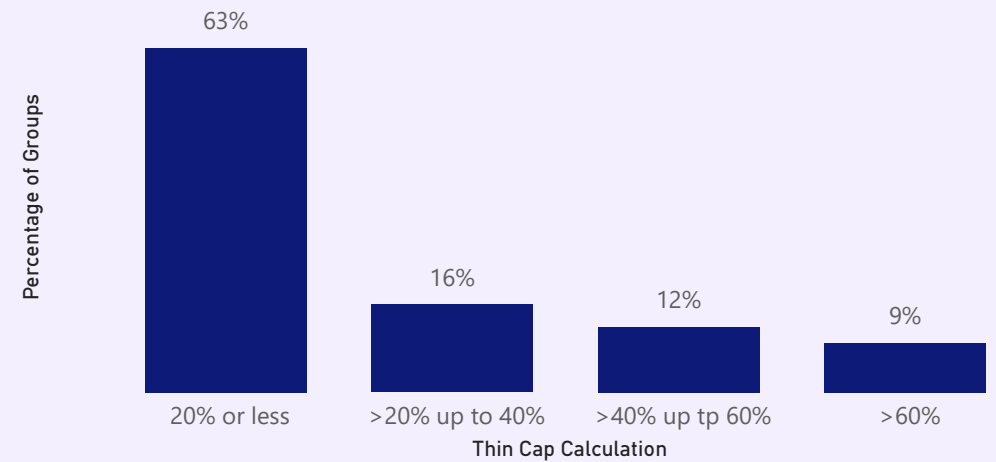
### Primary transfer pricing method

- Trans. net margin
- Cost plus
- Comp. uncontr. price
- N/A
- Trans. profit split
- Resale price



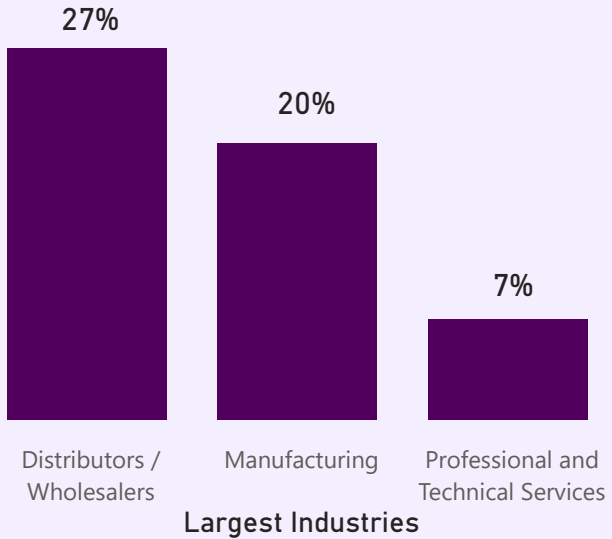
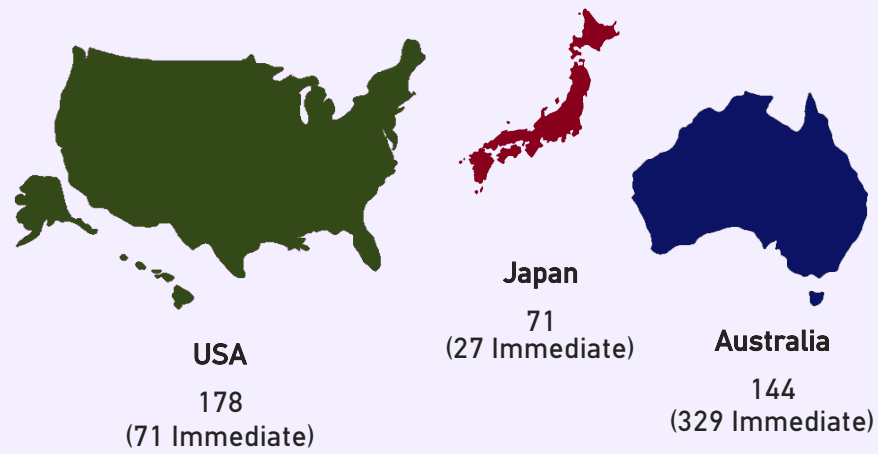
### Distribution of Groups: New Thin Capitalisation Calculation

(excl Financial Services)



### Highest Ultimate Ownership

(excl. Foreign Syndicates)



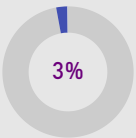
# International Questionnaire

## 2022 income year summary

794 foreign-owned groups  
(banks and insurers excluded)  
100% response rate

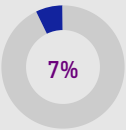
Out of 794 how many responded YES to...

Material structural changes that resulted in reduction of functions, assets risks of NZ operations



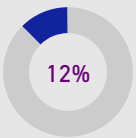
22 groups

NZ group aggregate amount of expenditure on goods and/or services over \$30 million NRAP transactions in any of HK, IE, LU, NL, SG or CH



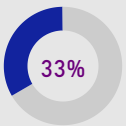
56 groups

Cross-border supplies to related parties >20% of Gross Revenue



98 groups

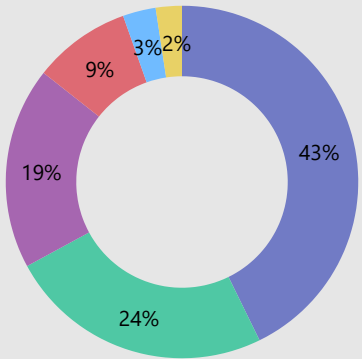
Cross-border supplies from related parties >20% of Gross Revenue



264 groups

### Primary transfer pricing method

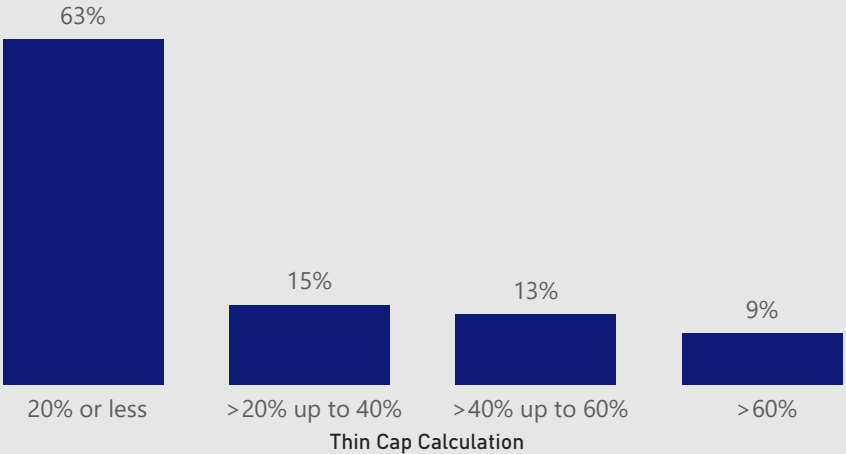
- Trans. net margin
- Cost plus
- Comp. uncontr. price
- N/A
- Trans. profit split
- Resale price



### Distribution of Groups: New Thin Capitalisation Calculation

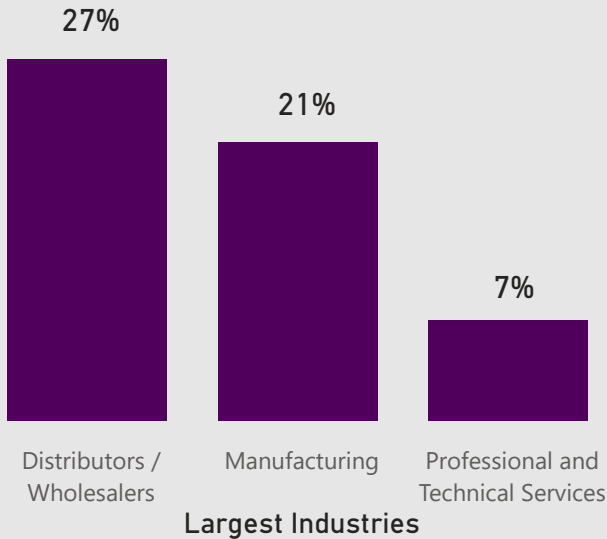
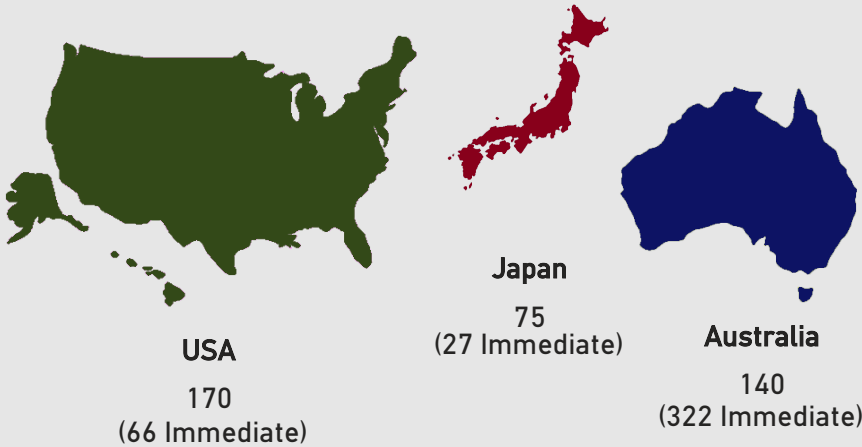
(excl Financial Services)

Percentage of Groups



### Highest Ultimate Ownership

(excl. Foreign Syndicates)



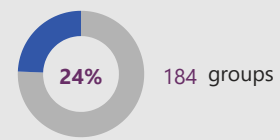
# International Questionnaire

## 2021 income year summary

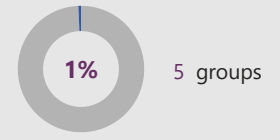
**755** foreign-owned groups  
(banks and insurers excluded)  
**100%** response rate

Out of **755** how many responded **YES** to...

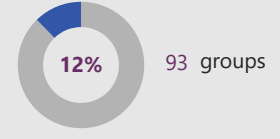
Financial performance impacted by COVID-19



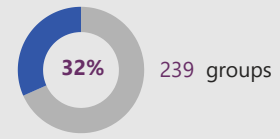
Material changes to transfer pricing due to COVID-19



Cross-border supplies to related parties >20% of Gross Revenue

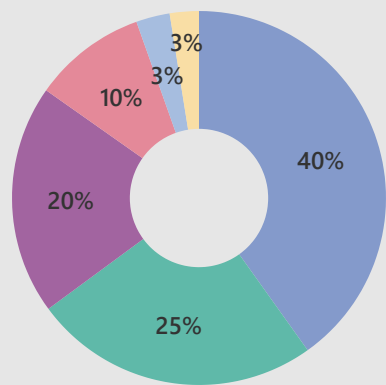


Cross-border supplies from related parties >20% of Gross Revenue



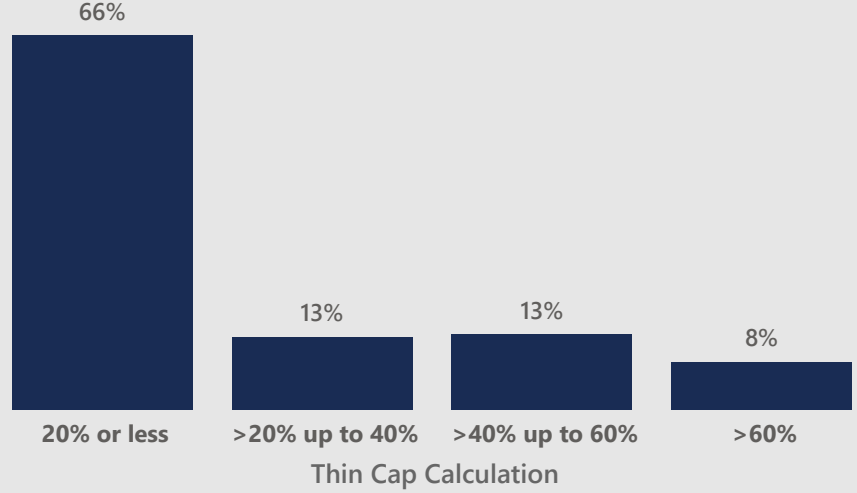
### Primary transfer pricing method

- Trans. net margin
- Cost plus
- Comp. uncontr. price
- N/A
- Trans. profit split
- Resale price

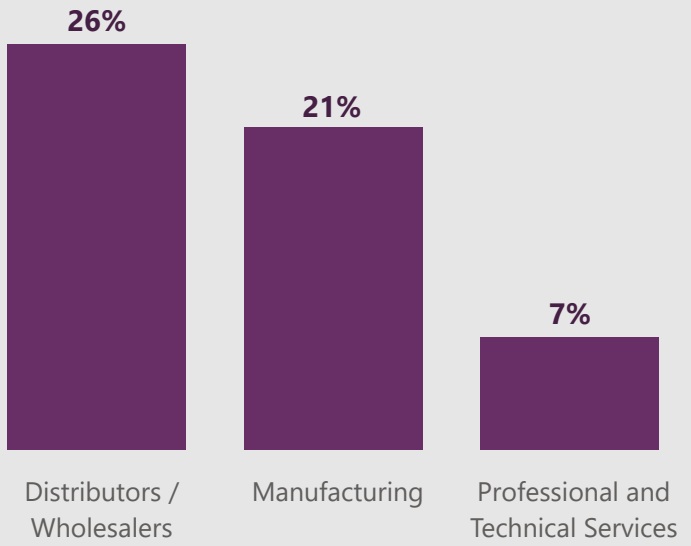
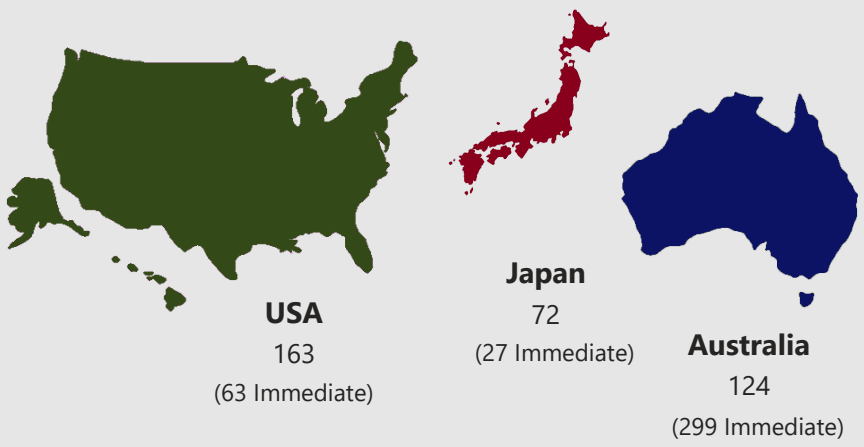


### Distribution of Groups: New Thin Capitalisation Calculation (excl. Financial Services)

Percentage of Groups



### Highest Ultimate Ownership (excl. Foreign Syndicates)



### Largest Industries

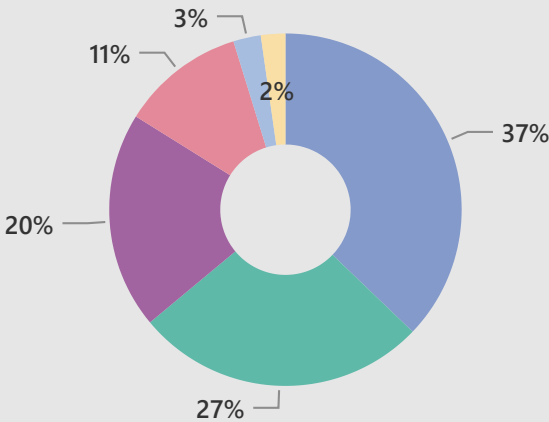
# International Questionnaire

## 2020 income year summary

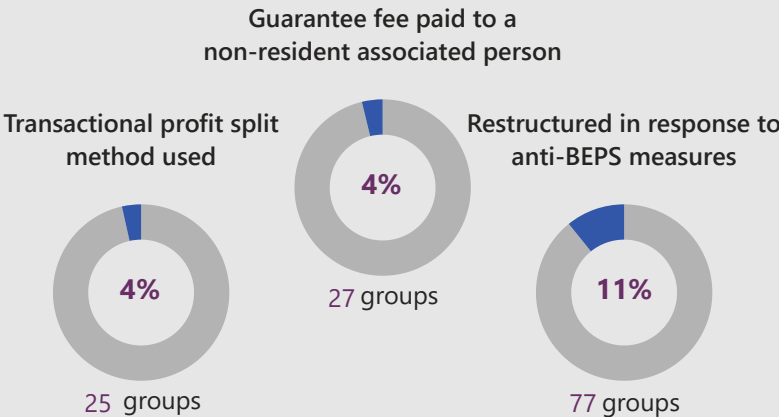
713 foreign-owned groups  
(banks and insurers excluded)  
100% response rate

### Primary transfer pricing method

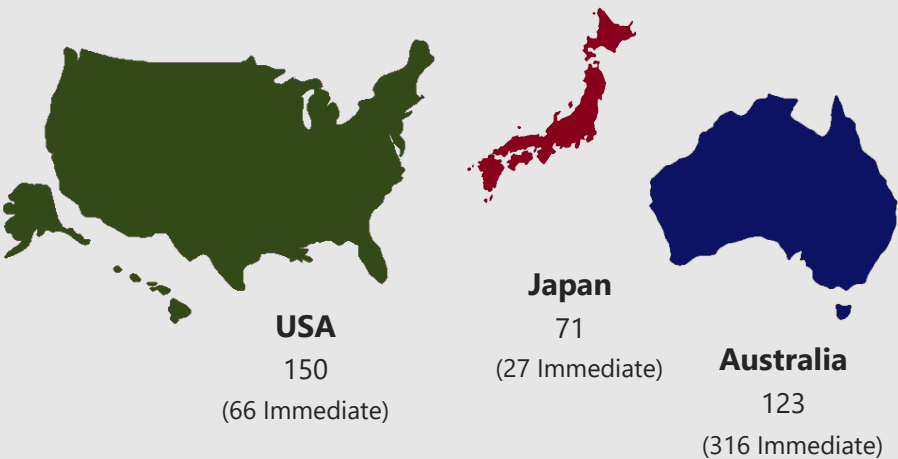
- Trans. net margin
- Cost plus
- Comp. uncontr. price
- N/A
- Trans. profit split
- Resale price



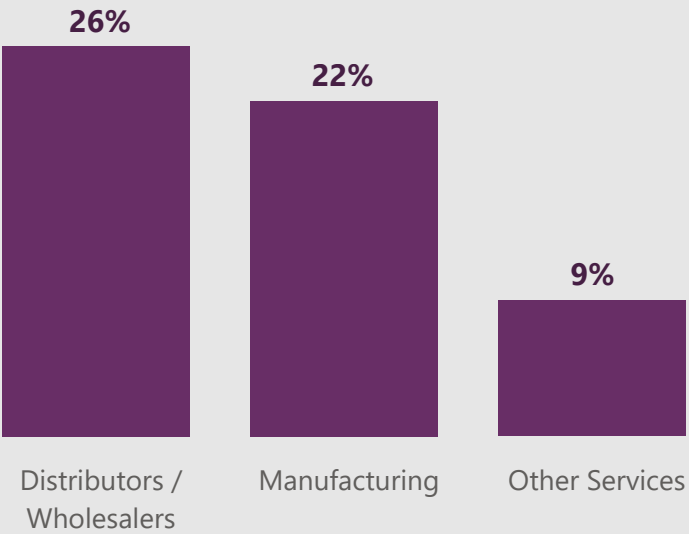
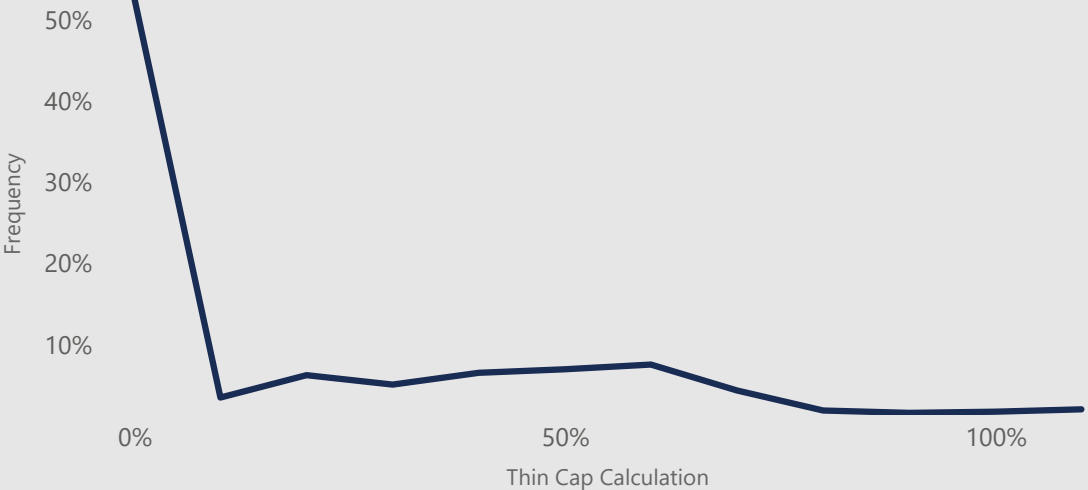
Out of 713 how many responded **YES** to...



### Highest Ultimate Ownership (excl. Foreign Syndicates)



### Distribution of Groups: New Thin Capitalisation Calculation (excl. Financial Services)



### Largest Industries

# International Questionnaire

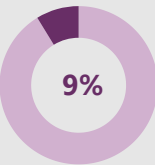
2019 income year summary

663 foreign-owned groups (banks and insurers excluded)

100% response rate

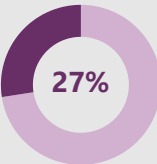
Out of 663 how many responded YES to...

Transactions with associated persons  
resident in low tax jurisdictions



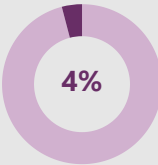
58 groups

Tax governance specifically  
for New Zealand



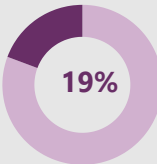
182 groups

Guarantee fee paid to a  
non-resident associated person



27 groups

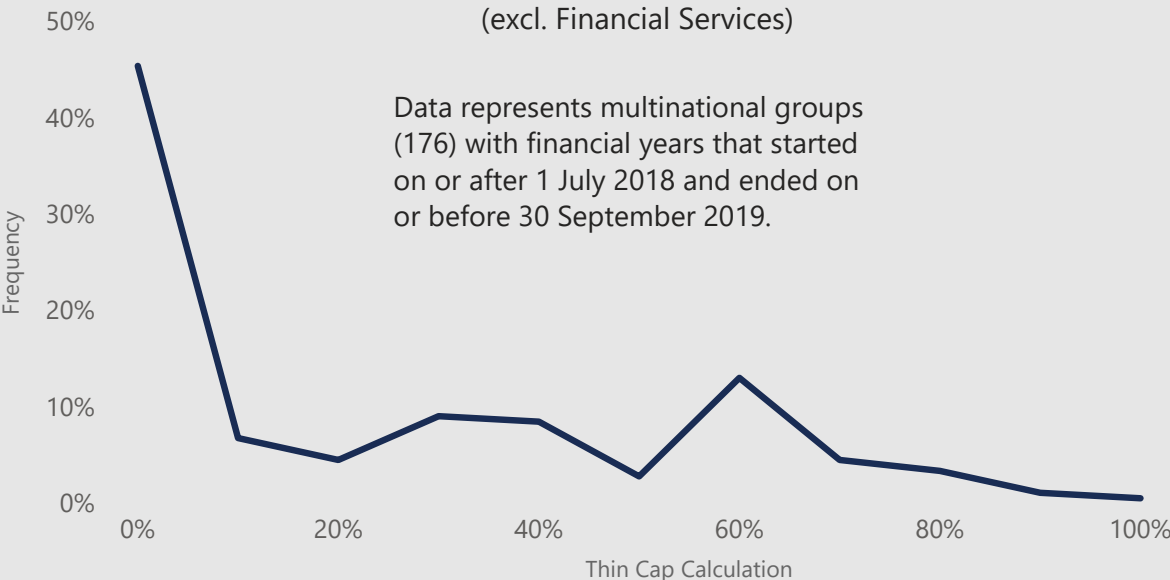
Restructured in response to  
anti-BEPS measures



128 groups

## Distribution of Groups: New Thin Capitalisation Calculation

(excl. Financial Services)

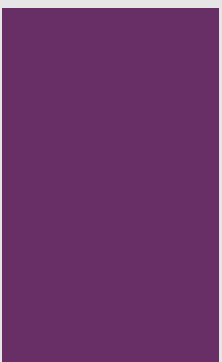


## Highest Ultimate Ownership

(excl. Foreign Syndicates)



24%



Distributors /  
Wholesalers

14%



Manufacturing (excl.  
Food and Beverage)

8%



Food and Beverage

## Largest Industries

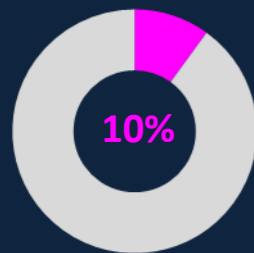
# International Questionnaire

## 2018 income year summary

623 foreign-owned groups - 100% response rate  
(banks and insurers excluded)

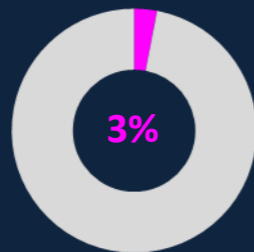
Out of 623 how many responded **YES** to...

Transactions with associated persons  
resident in certain low tax jurisdictions



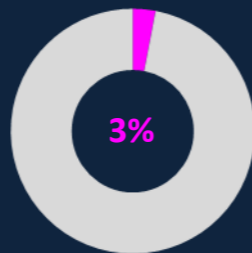
60 groups

Material structural changes  
in the 2018 income year



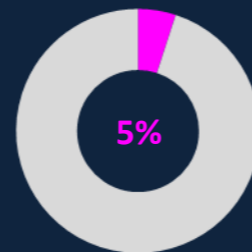
18 groups

Guarantee fee paid to a non-  
resident associated person



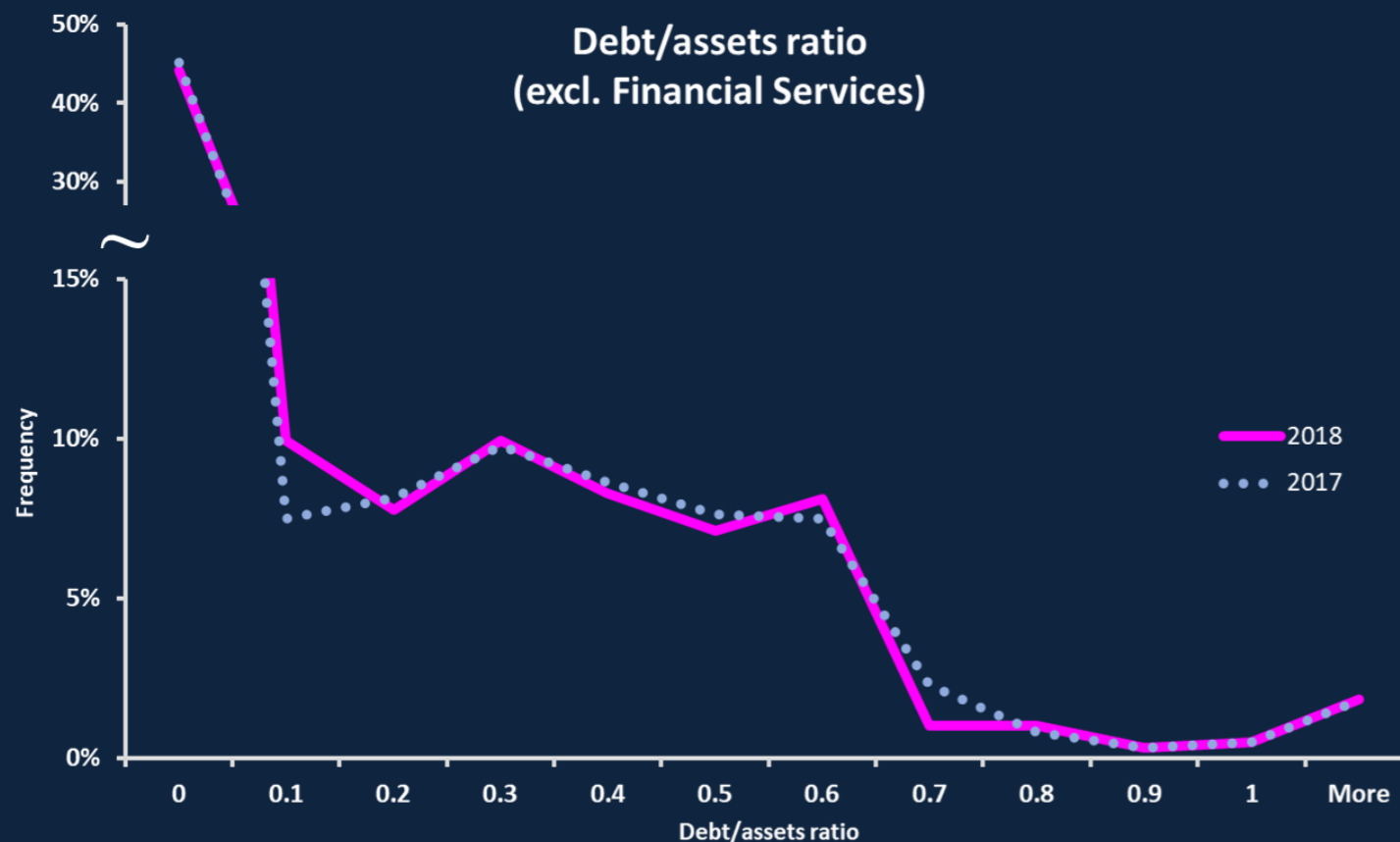
21 groups

Hybrid entities

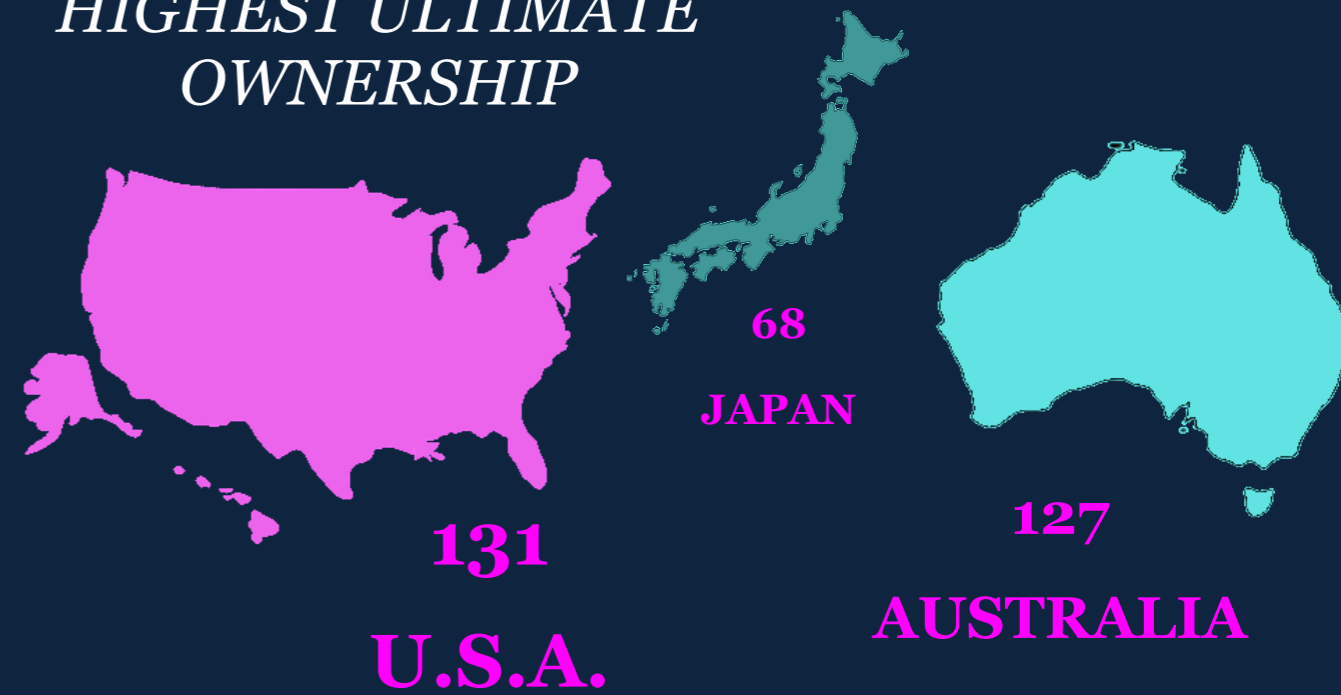


29 groups

Distribution of groups by thin cap percentage of New Zealand Group

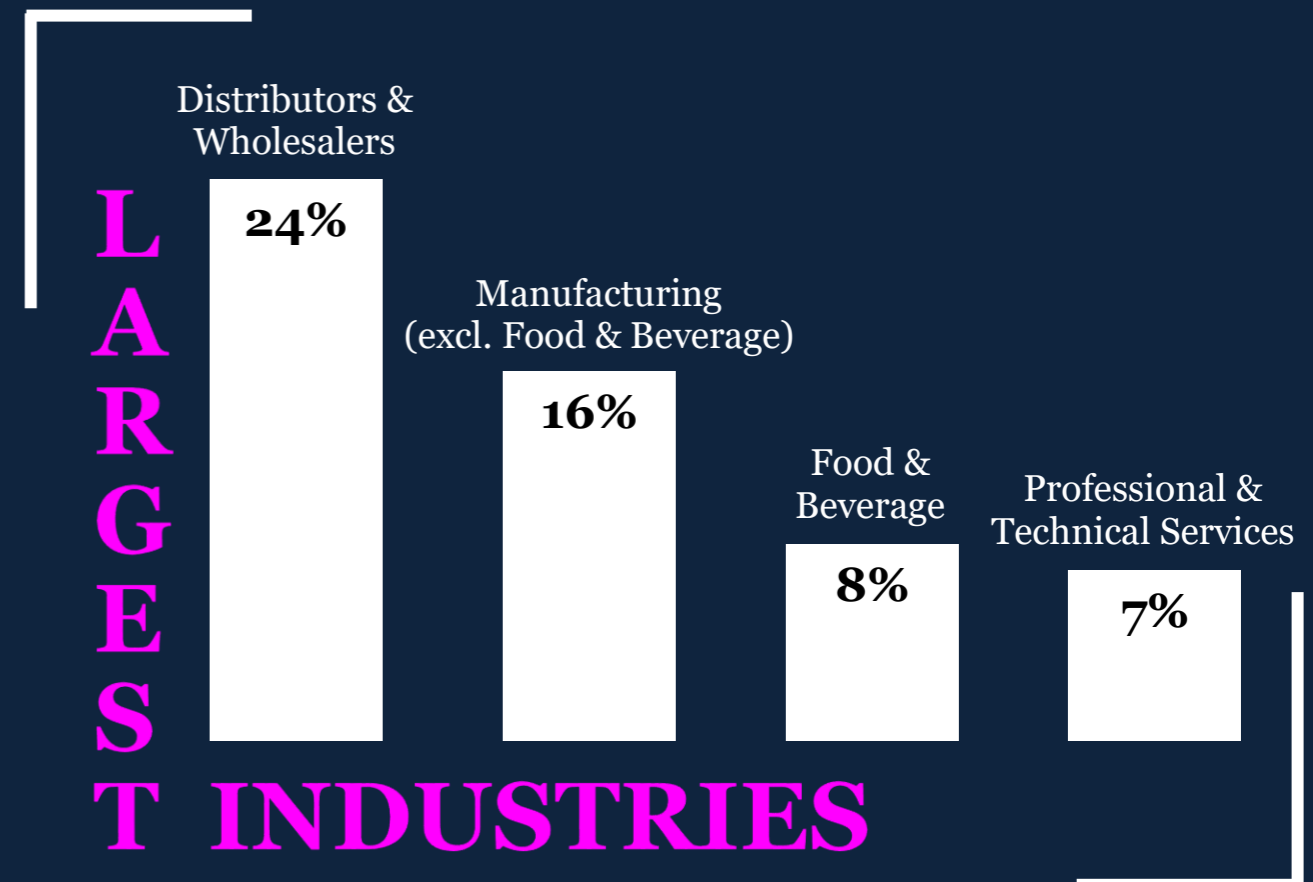


HIGHEST ULTIMATE  
OWNERSHIP



168 groups paid royalties  
out of which

62 groups were rated high  
using the 25% rule



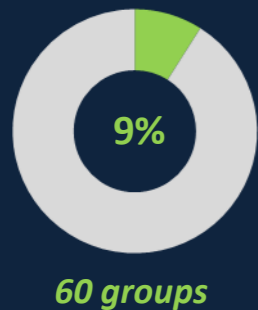
# International Questionnaire

## 2017 income year summary

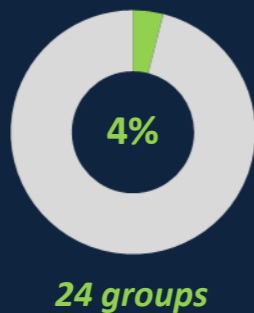
646 foreign-owned groups - 100% response rate  
(banks and insurers excluded)

Out of 646 how many responded **YES** to...

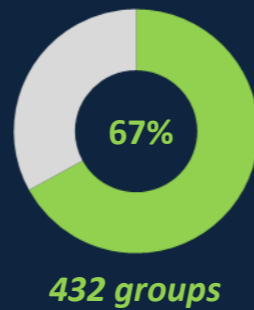
Transactions with associated persons  
resident in certain low tax jurisdictions



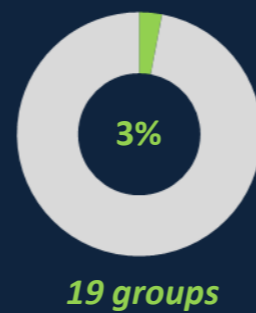
Material structural changes  
in the 2017 income year



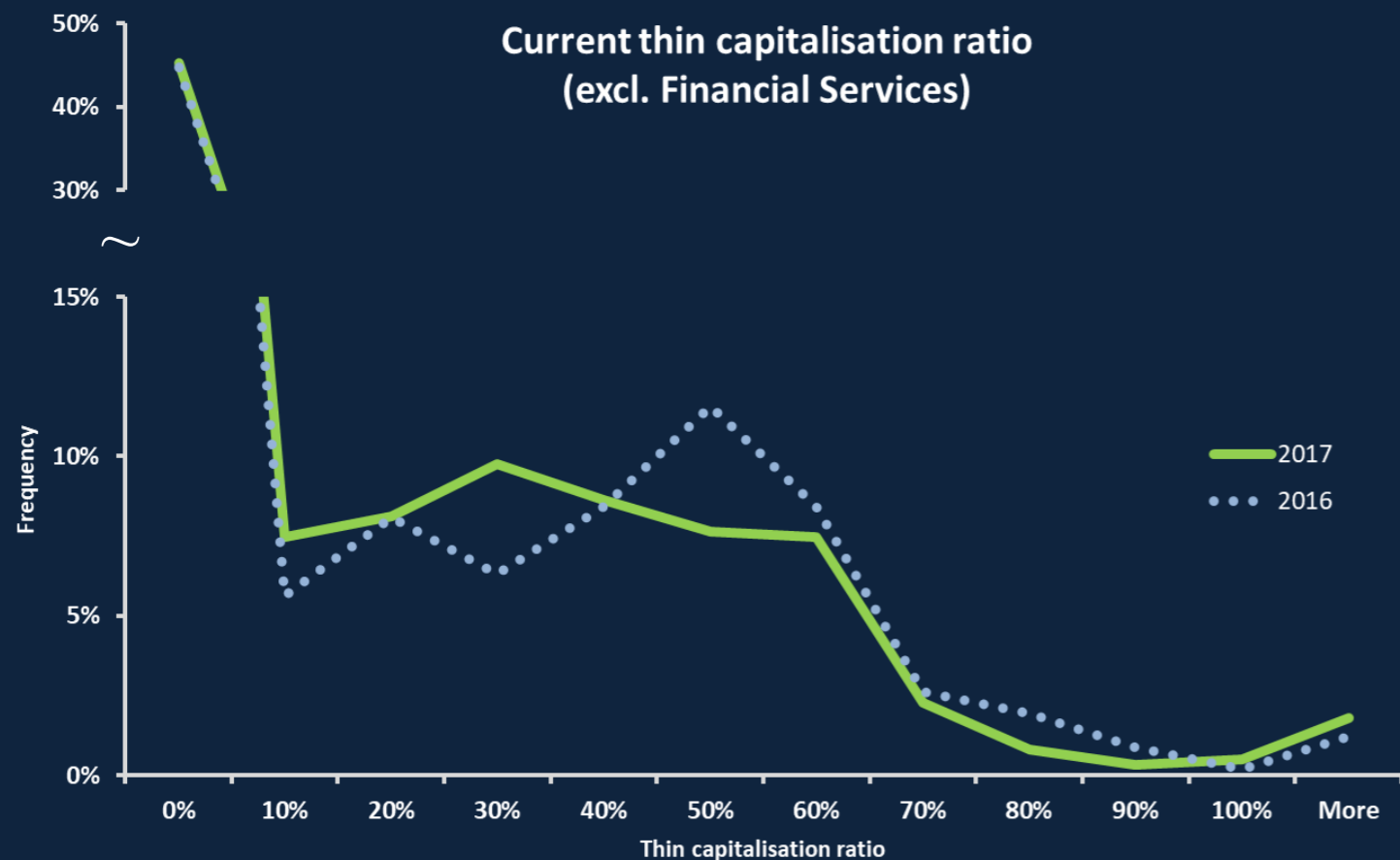
Global group participates in  
Country-by-Country Reporting



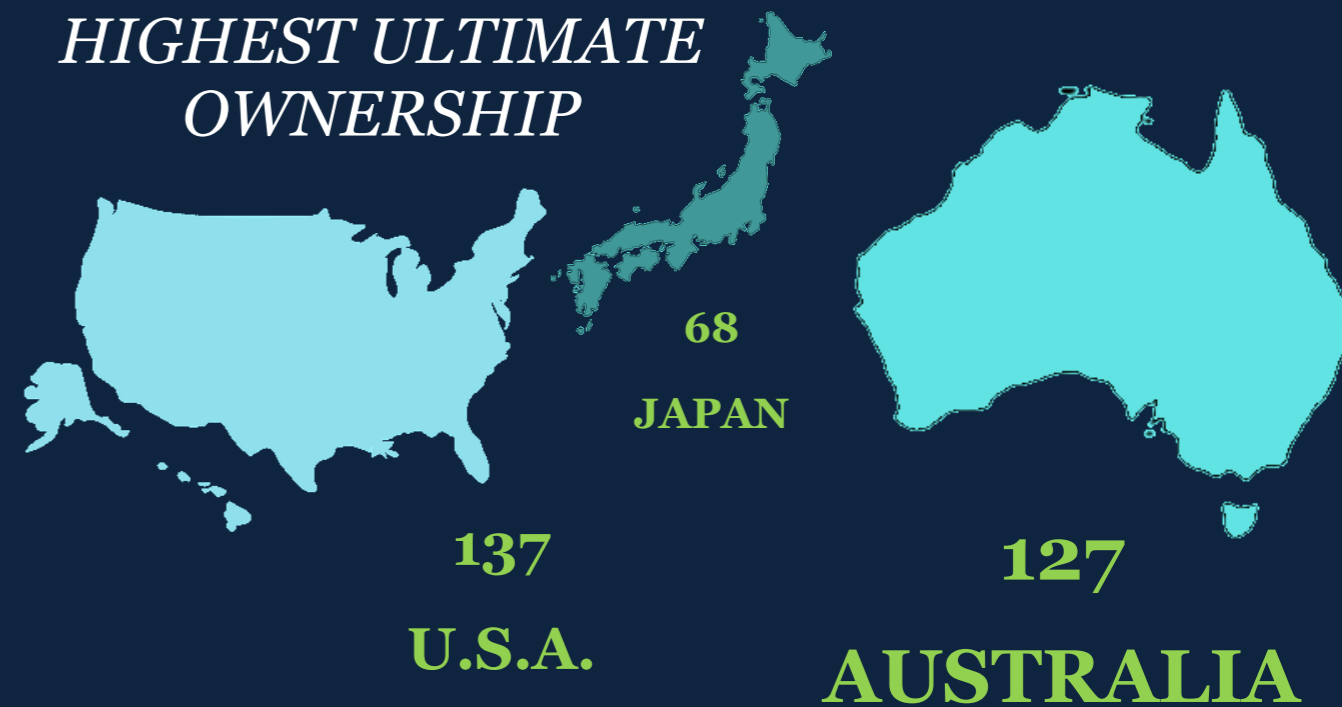
Hybrid entities



Distribution of groups by thin cap percentage of New Zealand Group



HIGHEST ULTIMATE  
OWNERSHIP



166 groups paid royalties  
out of which

78 groups were rated high  
using the 25% rule

L  
A  
R  
G  
E  
S  
T  
I  
N  
D  
U  
S  
T  
R  
I  
E  
S

Distributors &  
Wholesalers

21%

Manufacturing  
(excl. Food & Beverage)

16%

Professional &  
Technical Services

8%

Food &  
Beverage

8%

# International Questionnaire

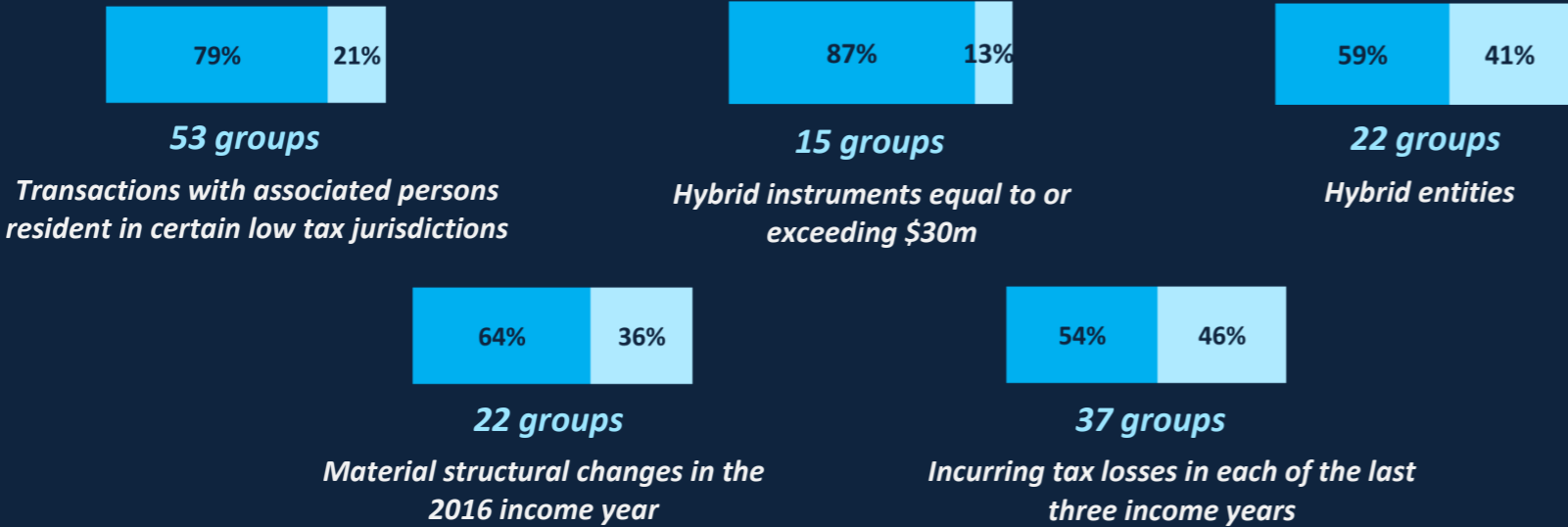
## 2016 income year summary

594 foreign-owned groups - 100% response rate  
(banks and insurers excluded)

336 groups with turnover greater than \$80 million  
258 groups with turnover between \$30 million - \$80 million

Out of 594 how many responded **YES** to...

**Dark Blue** % of groups with turnover greater than \$80 million  
**Light Blue** % of groups with turnover between \$30 million - \$80 million



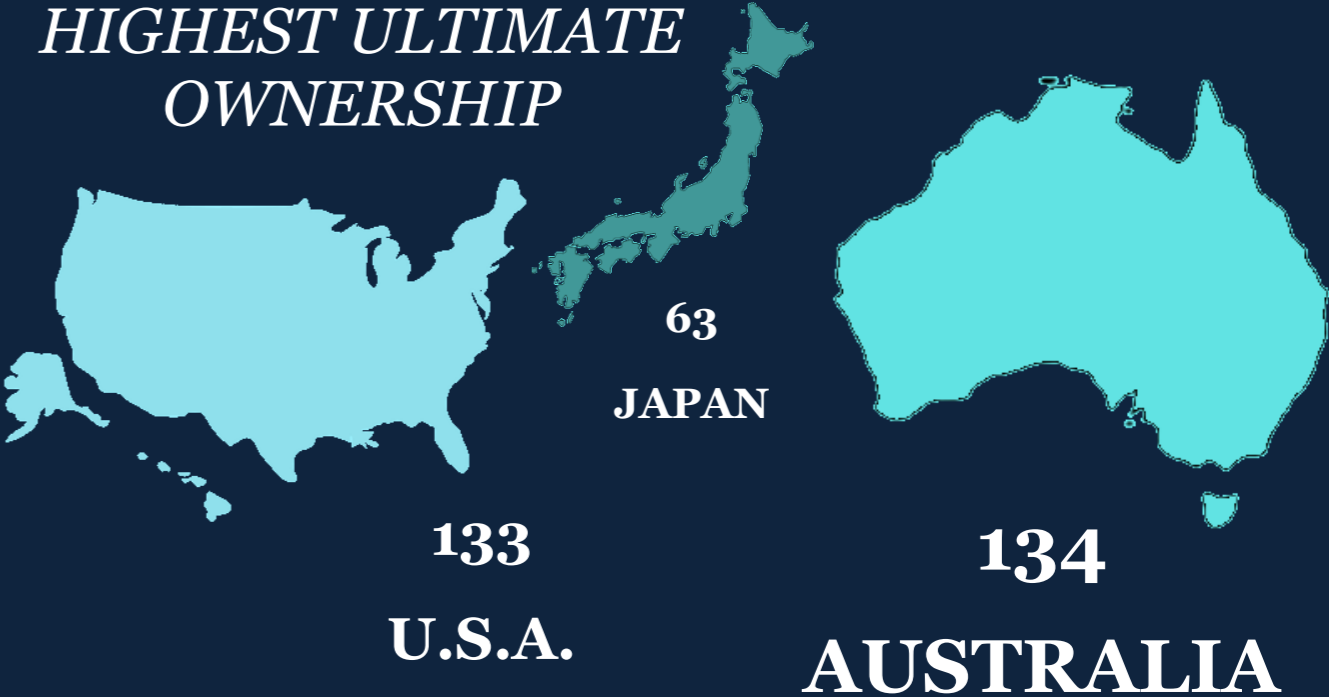
Total number of groups by thin cap percentage of New Zealand Group  
(excludes financial services)

0%-20%	21%-40%	41%-60%	Above 60%
329	84	114	39

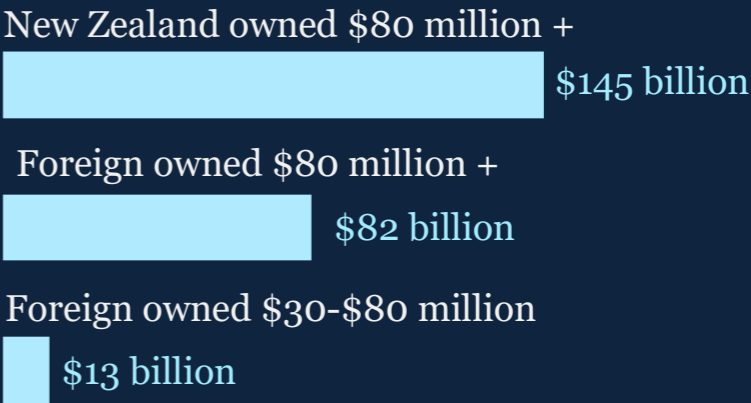
Total R&D/Gross Revenue  
**0.30%**

Total Intangibles/Total Assets  
**11.71%**

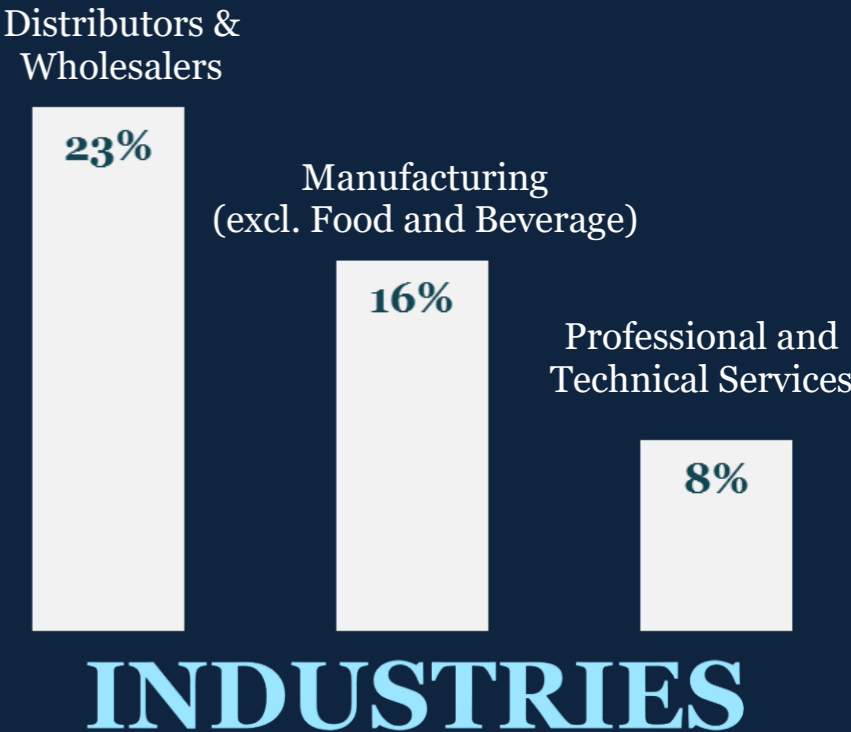
### HIGHEST ULTIMATE OWNERSHIP



### TURNOVER BY POPULATION



LARGEST INDUSTRIES

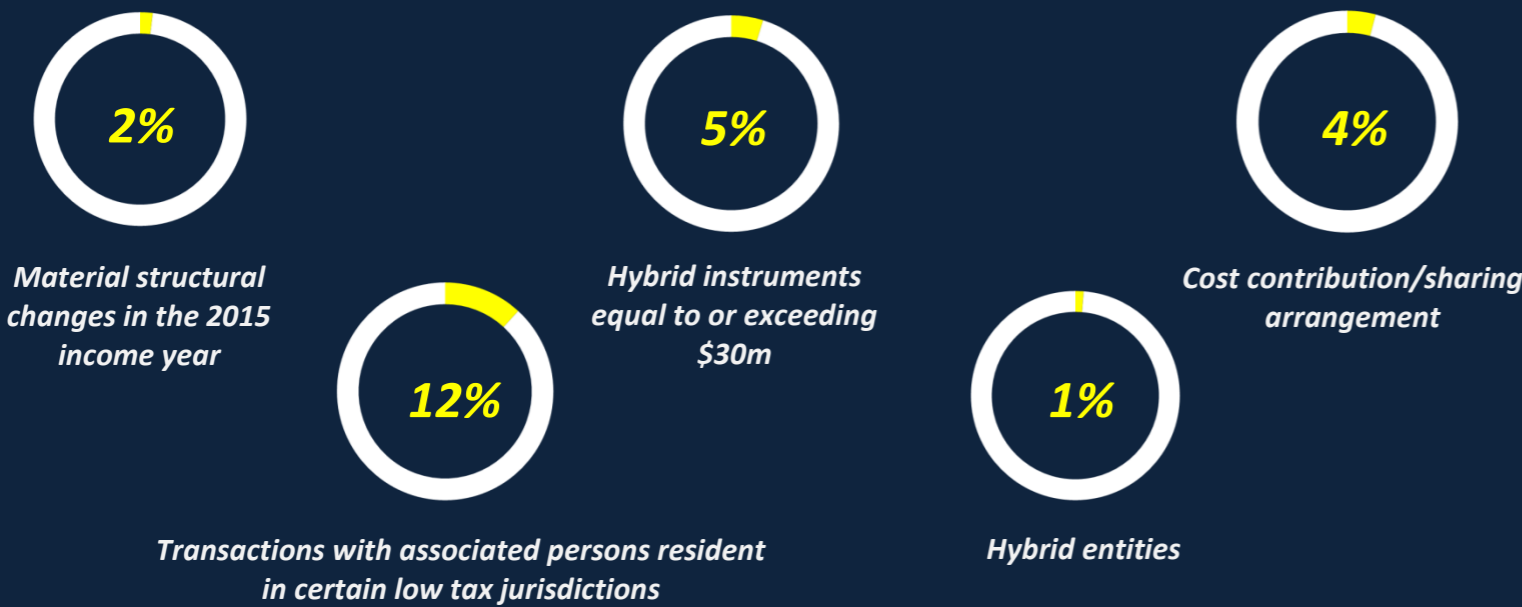


# International Questionnaire

## 2015 income year summary

314 foreign-owned groups - 100% response rate  
*(banks and insurers excluded)*

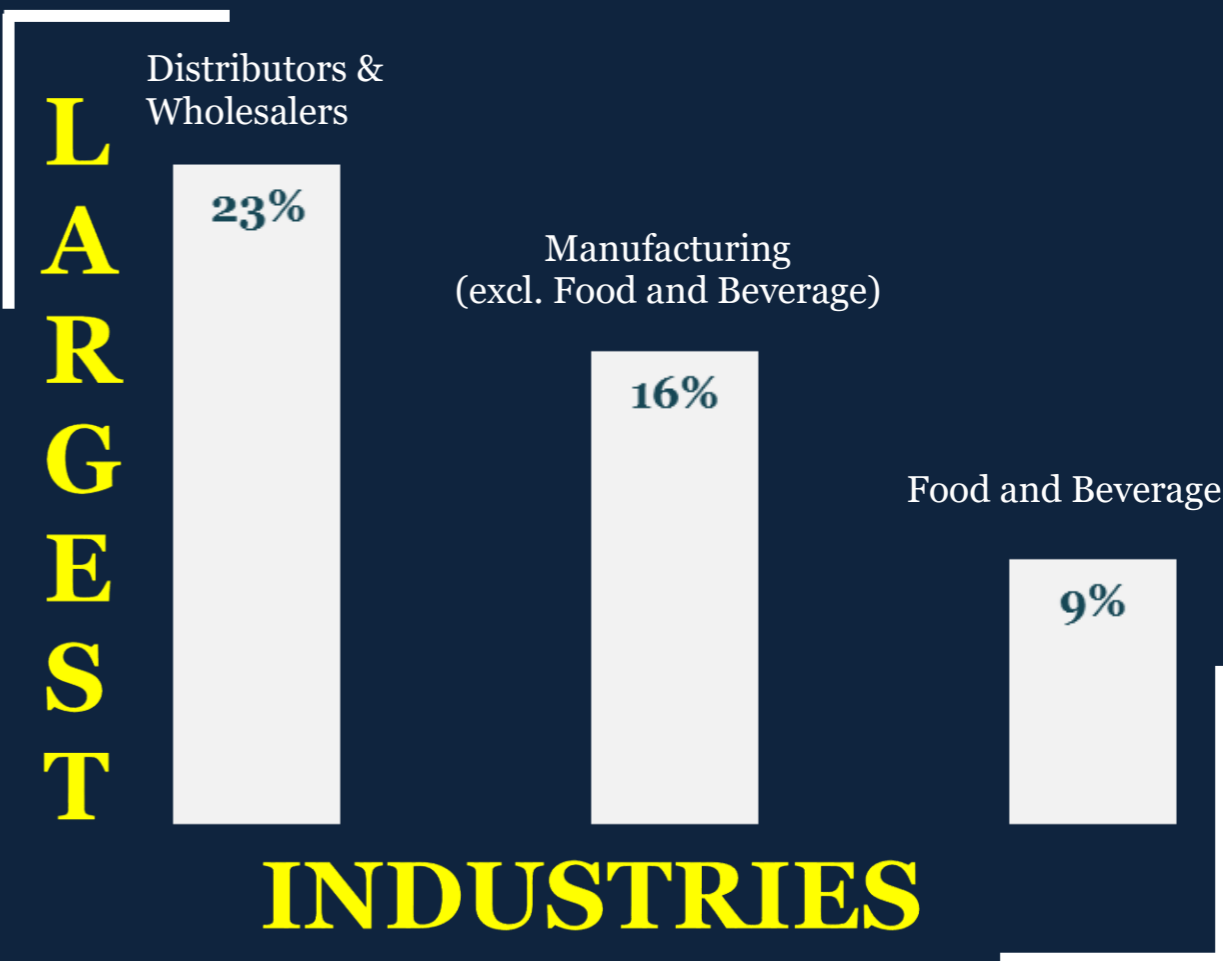
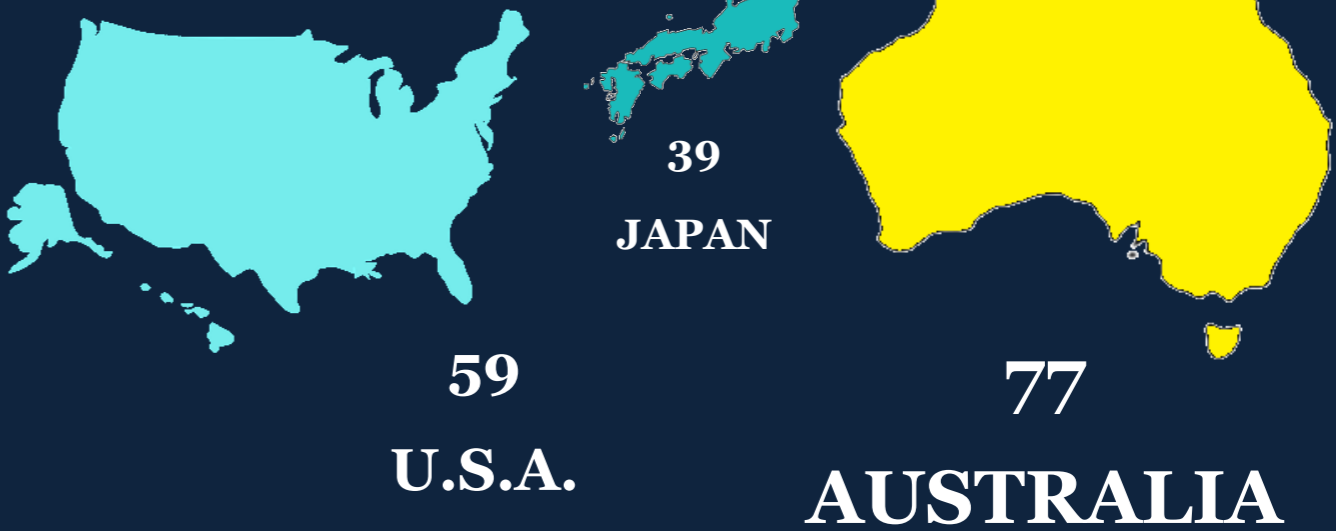
How many responded **YES** to...



Total R&D/Gross Revenue  
**0.13%**

Total Intangibles/Total Assets  
**17.34%**

### HIGHEST ULTIMATE OWNERSHIP



**97** groups paid royalties out of which **46** groups were rated high using the **25% rule**

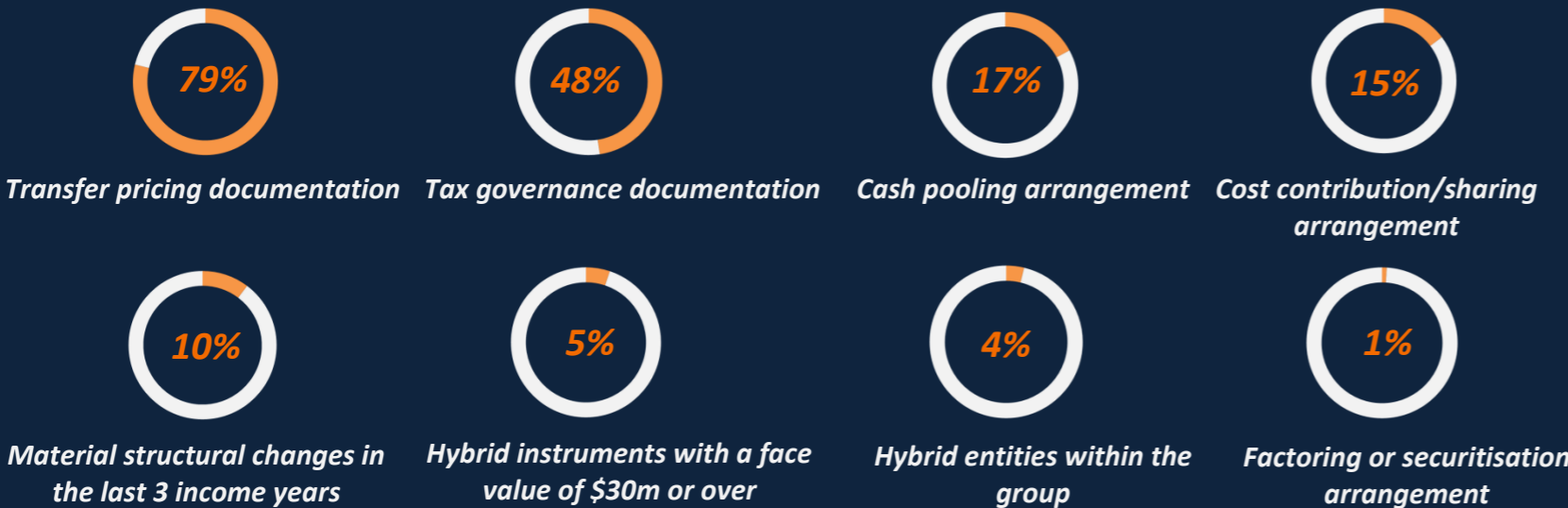
# International Questionnaire

## 2014 income year summary

292 foreign-owned groups  
*(banks and insurers excluded)*

100% response rate

How many responded YES to...

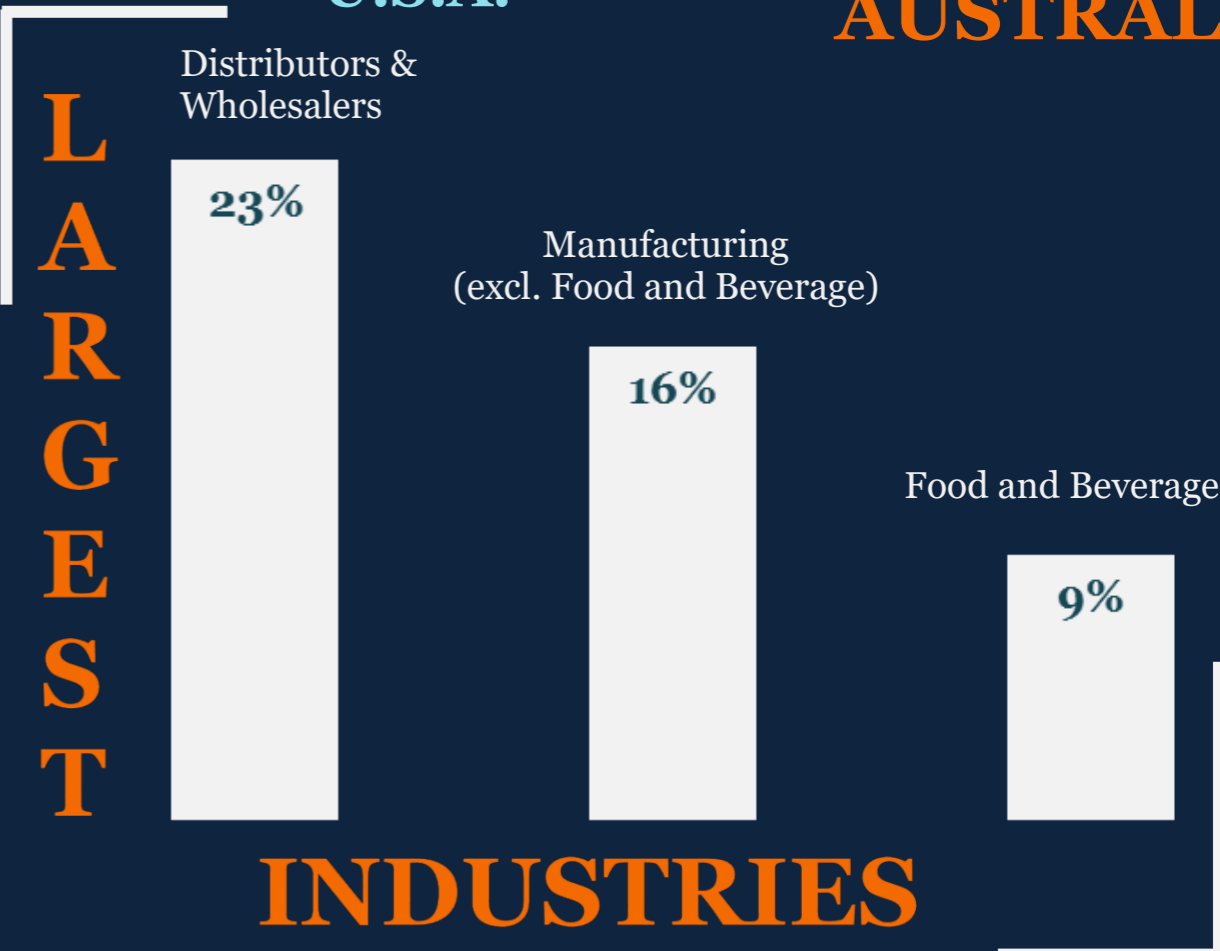
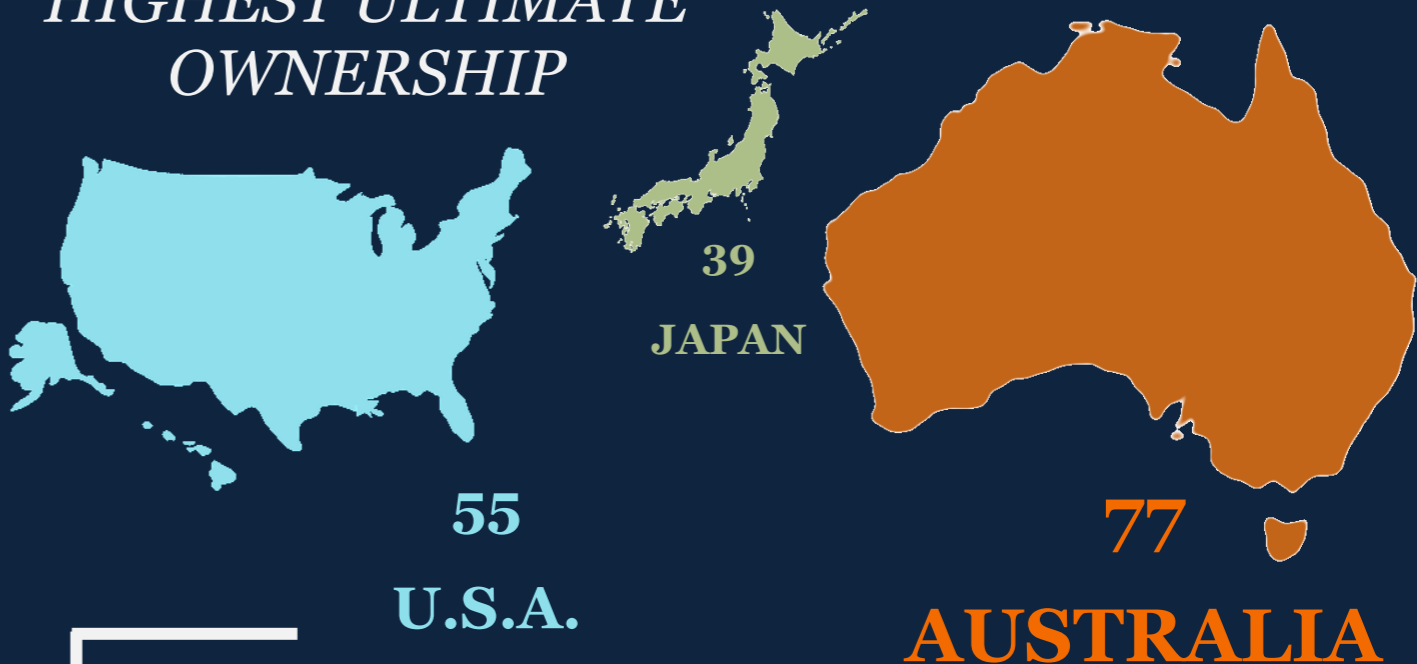


Total R&D/Gross Revenue  
**0.15%**

Total Intangibles/Total Assets  
**17.18%**

Total Insurance or Re-insurance/Gross Revenue **0.11%**

### HIGHEST ULTIMATE OWNERSHIP



14 groups exceeded the 60% thin capitalisation threshold

198 groups had net finance costs