

# International Questionnaire

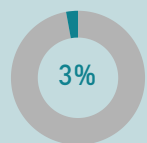
## 2025 income year summary

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

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

Out of **911** how many responded **YES** to...

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



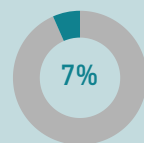
26 groups

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



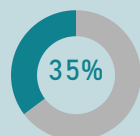
60 groups

Profitability of the New Zealand group impacted adversely in the 2025 income year by abnormal business conditions or events



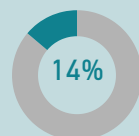
60 groups

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

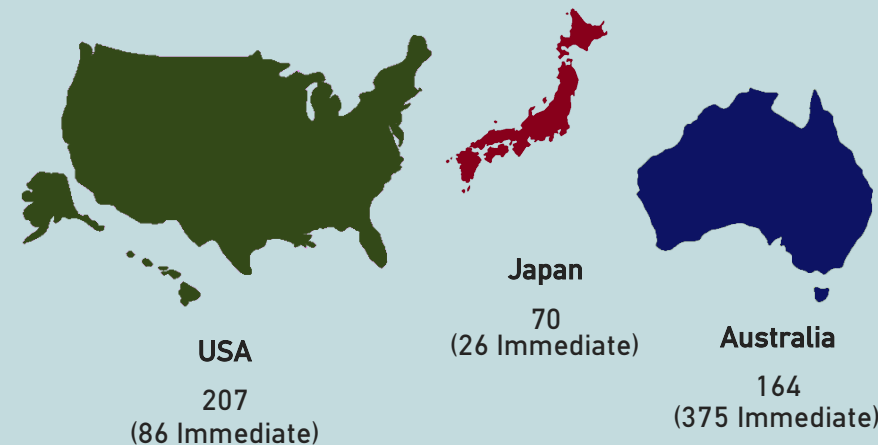


321 groups

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

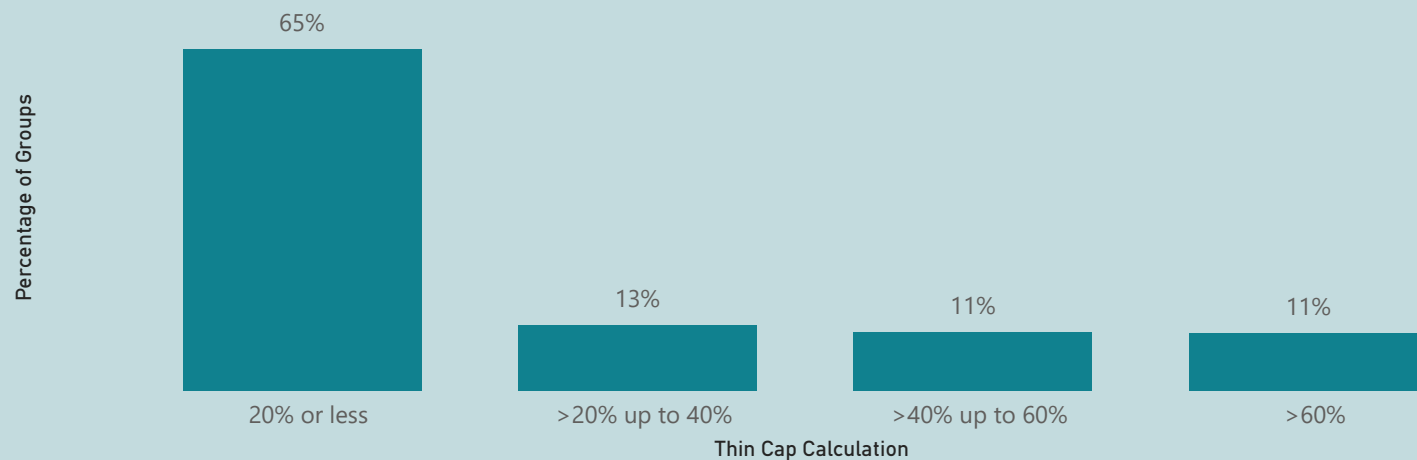


126 groups

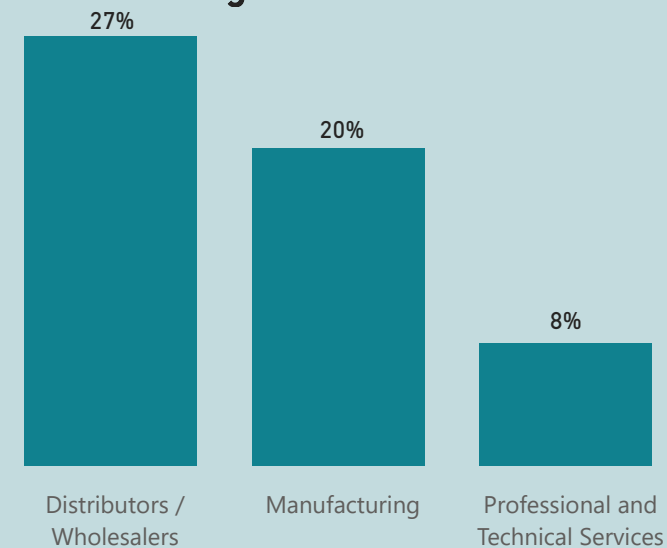


### Distribution of Groups: Thin Capitalisation Calculation

(excl Financial Services)



### Largest Industries



# International Questionnaire

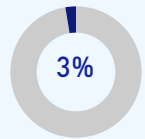
## 2024 income year summary

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

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

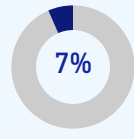
Out of **885** how many responded **YES** to...

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



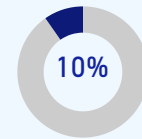
23 groups

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



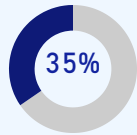
58 groups

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



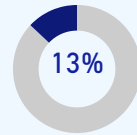
86 groups

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

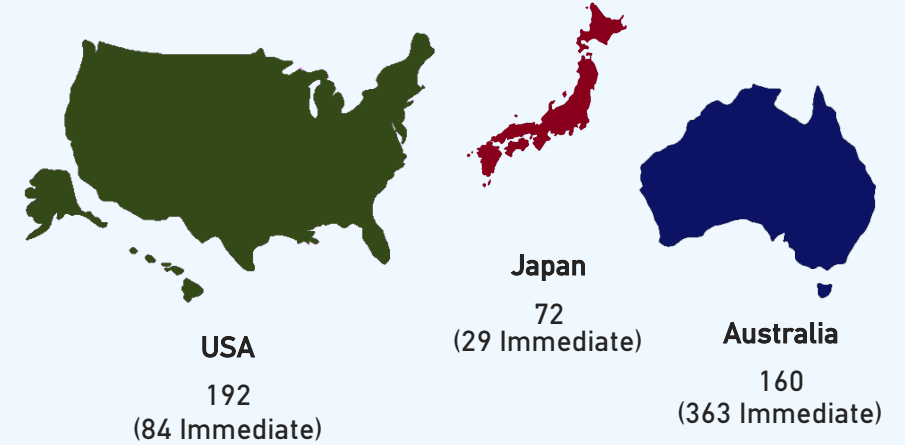


306 groups

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

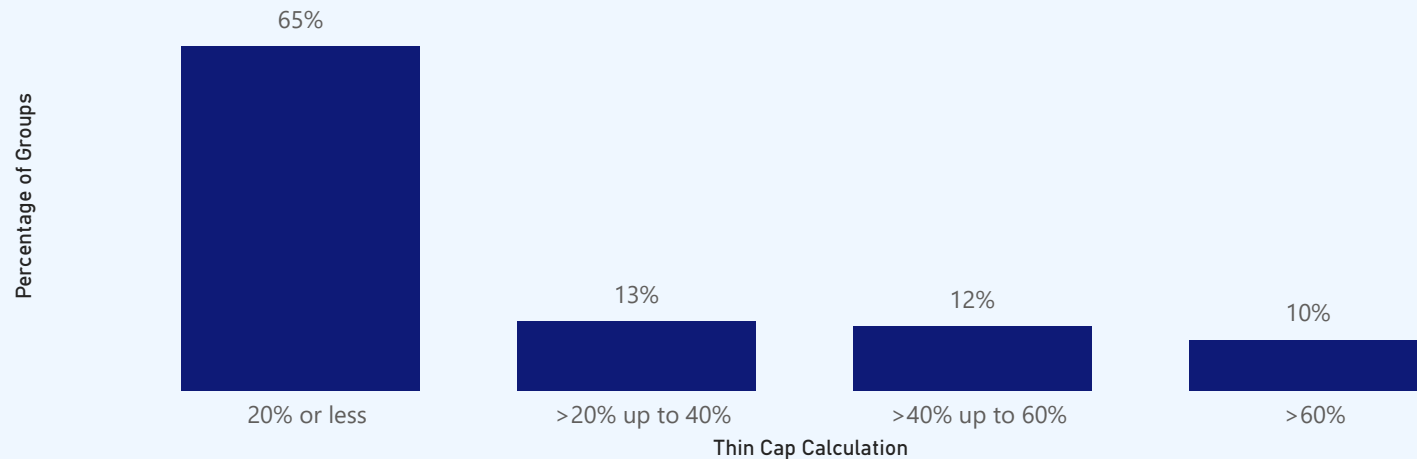


115 groups

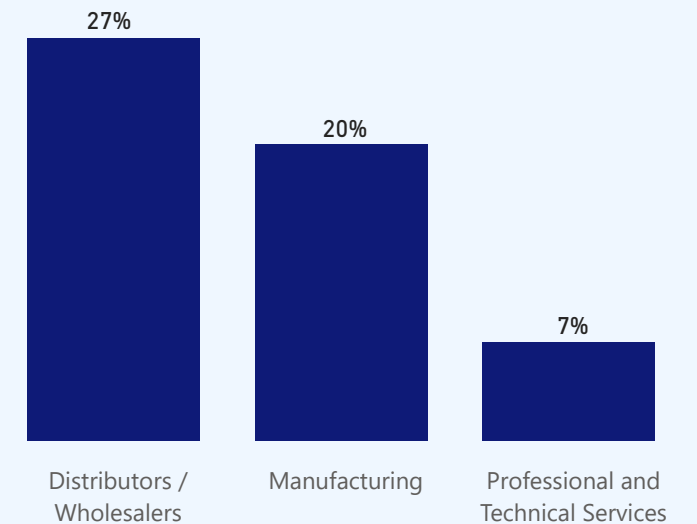


### Distribution of Groups: Thin Capitalisation Calculation

(excl Financial Services)



### Largest Industries



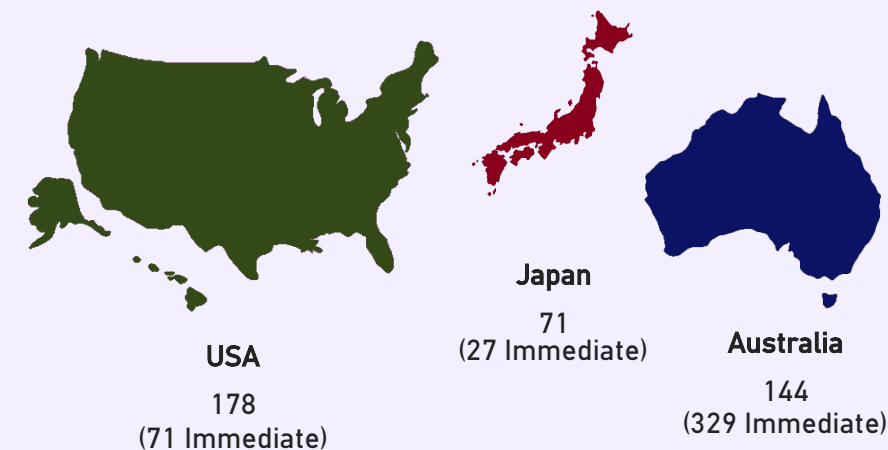
# International Questionnaire

## 2023 income year summary

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

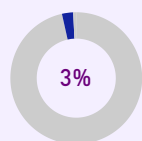
### Highest Ultimate Ownership

(excl. Foreign Syndicates)



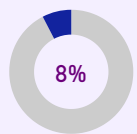
Out of **802** how many responded **YES** to...

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



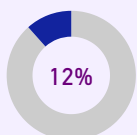
22 groups

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



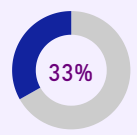
61 groups

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



93 groups

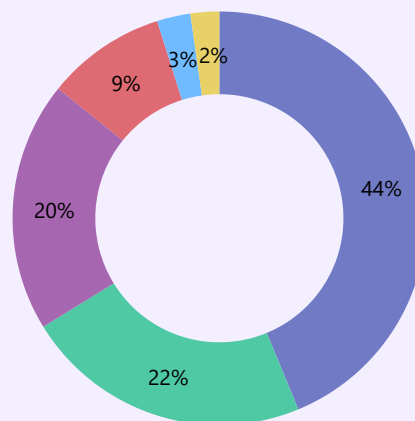
Cross-border supplies from related parties >20% of Gross Revenue



266 groups

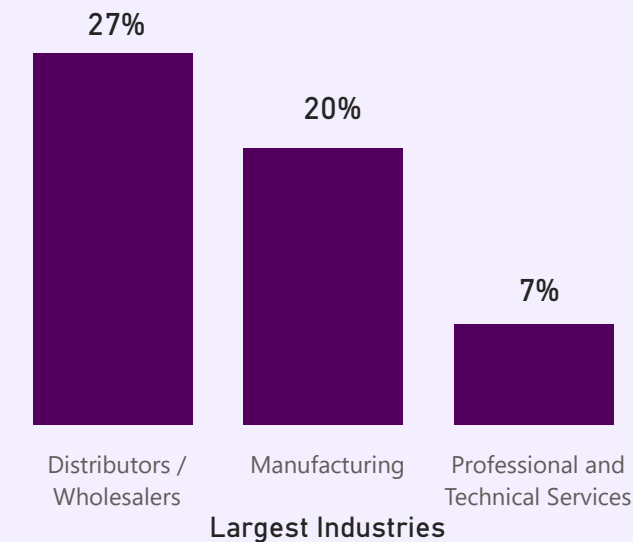
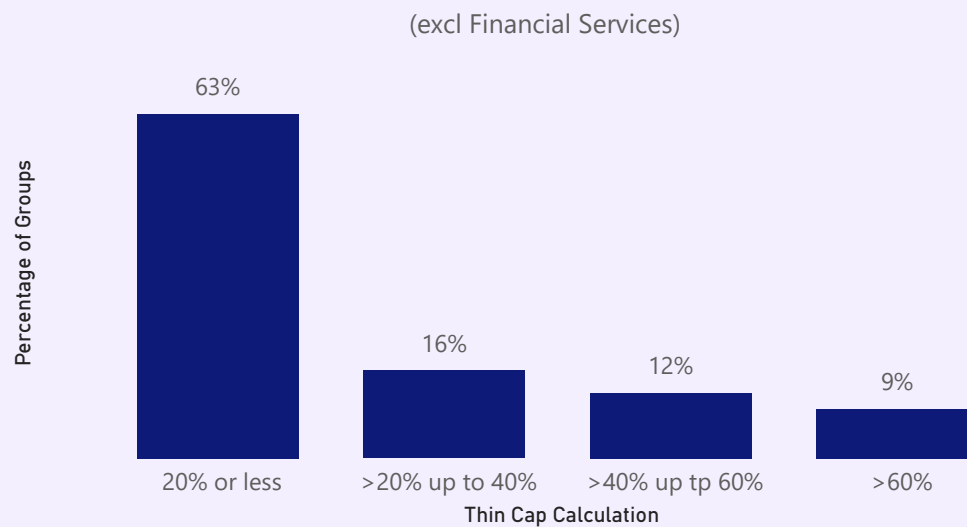
### Primary transfer pricing method

- 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)



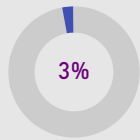
# International Questionnaire

## 2022 income year summary

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

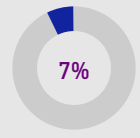
Out of **794** how many responded **YES** to...

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



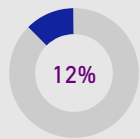
22 groups

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



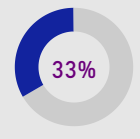
56 groups

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



98 groups

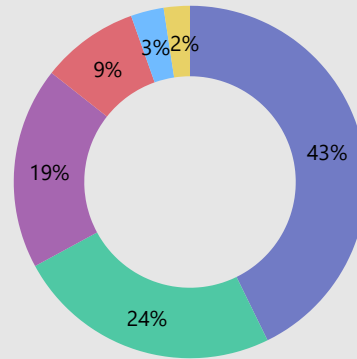
Cross-border supplies from related parties >20% of Gross Revenue



264 groups

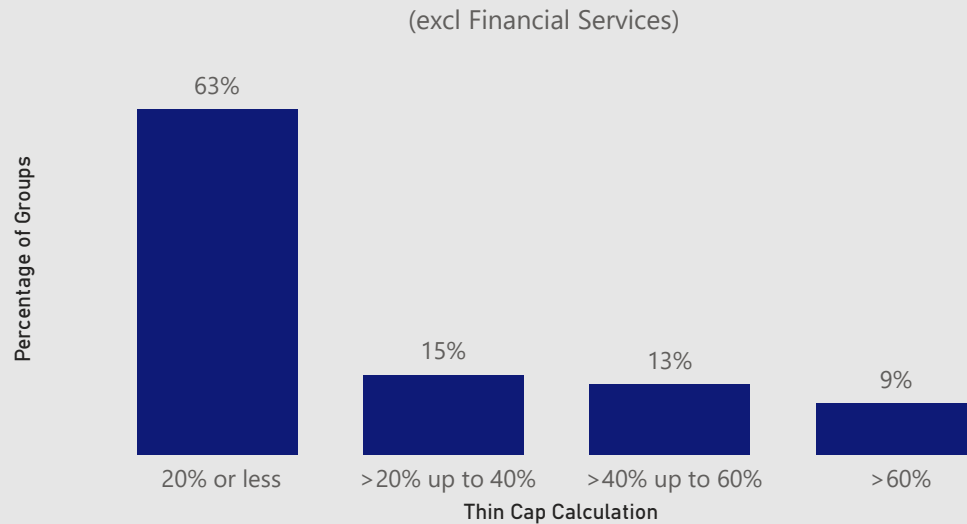
### Primary transfer pricing method

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



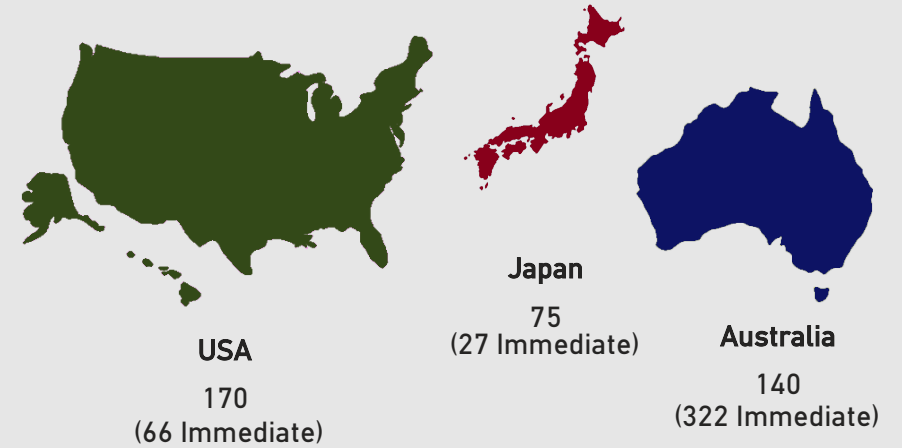
### Distribution of Groups: New Thin Capitalisation Calculation

(excl Financial Services)



### Highest Ultimate Ownership

(excl. Foreign Syndicates)



27%



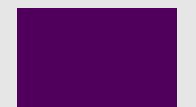
Distributors / Wholesalers

21%



Manufacturing

7%



Professional and Technical Services

Largest Industries

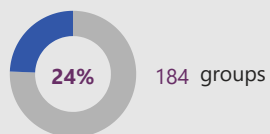
# International Questionnaire

## 2021 income year summary

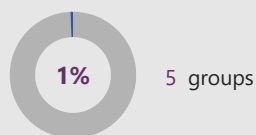
**755** foreign-owned groups  
(banks and insurers excluded)  
**100%** response rate

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

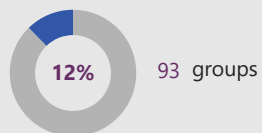
Financial performance impacted by COVID-19



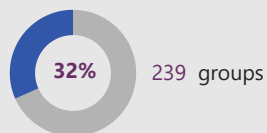
Material changes to transfer pricing due to COVID-19



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

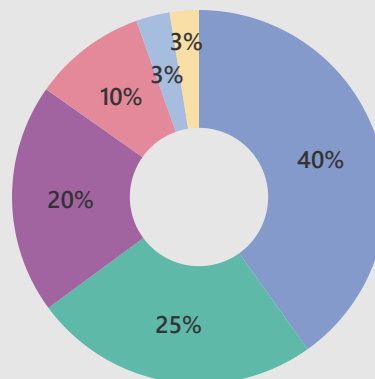


Cross-border supplies from related parties >20% of Gross Revenue



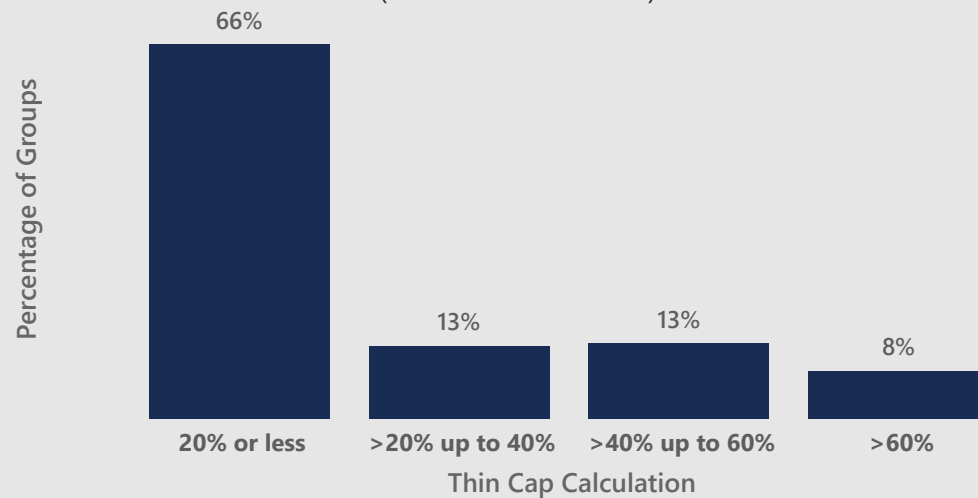
### Primary transfer pricing method

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



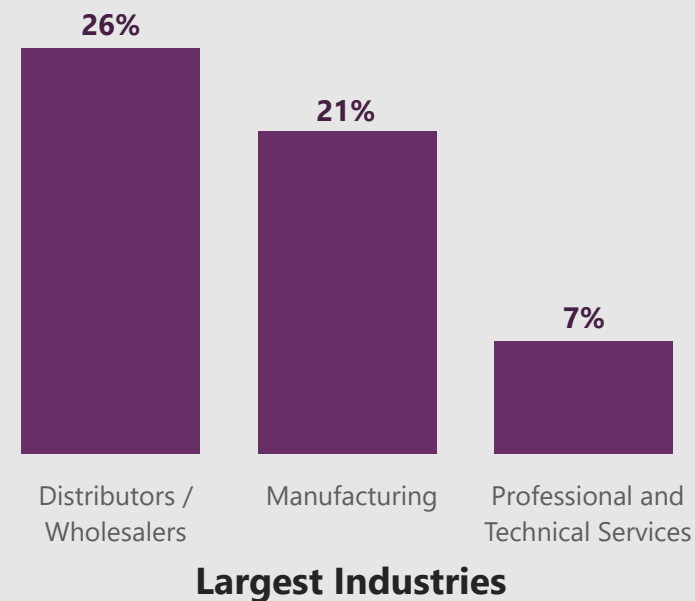
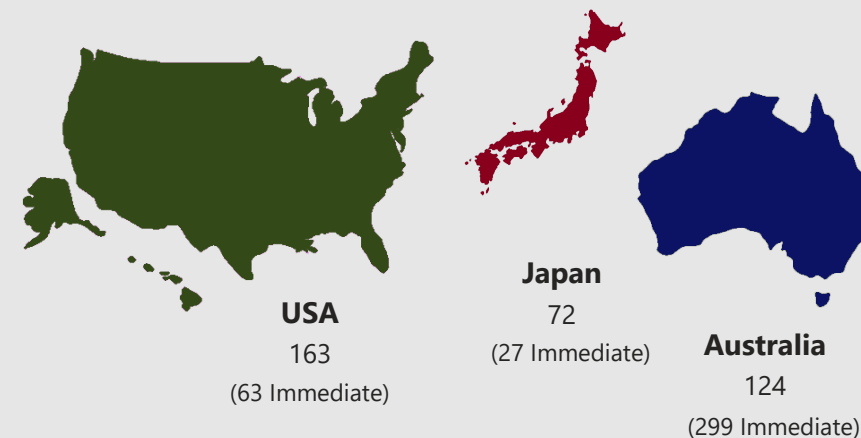
### Distribution of Groups: New Thin Capitalisation Calculation

(excl. Financial Services)



### Highest Ultimate Ownership

(excl. Foreign Syndicates)



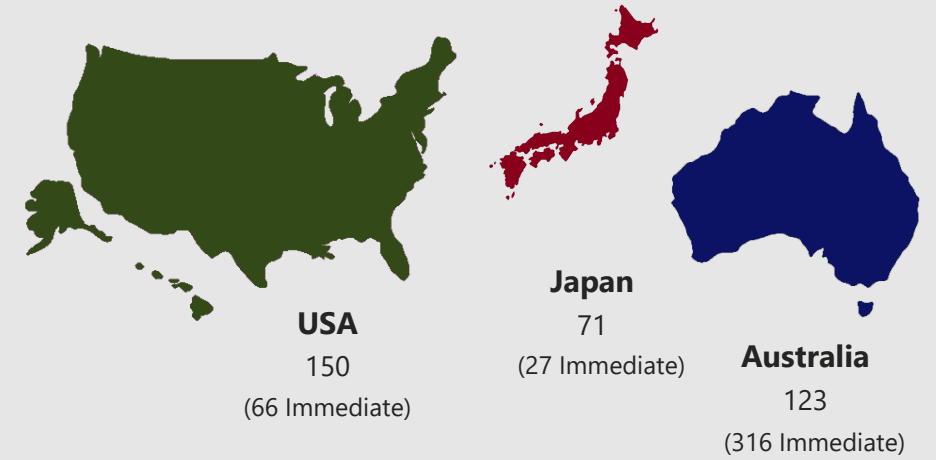
# International Questionnaire

## 2020 income year summary

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

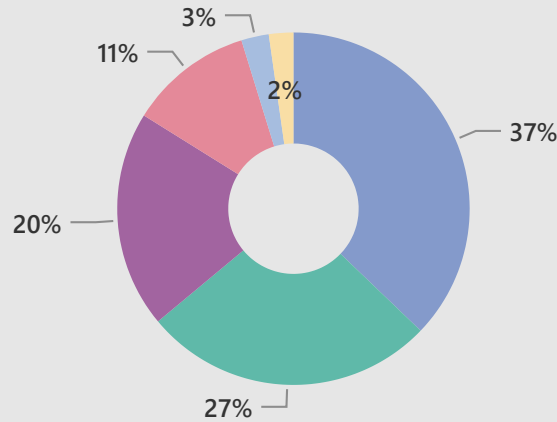
### Highest Ultimate Ownership

(excl. Foreign Syndicates)

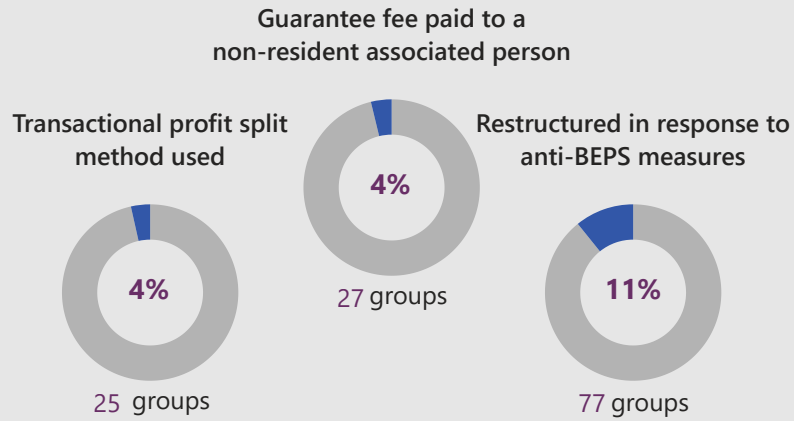


#### Primary transfer pricing method

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

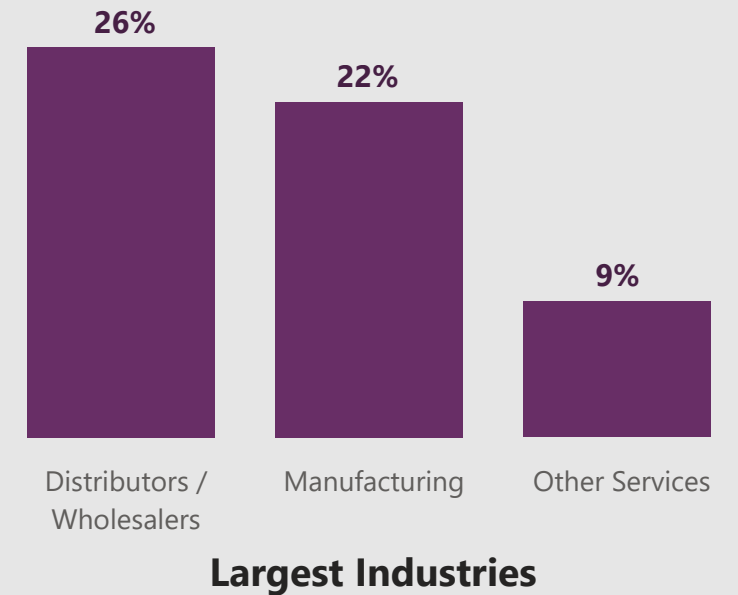
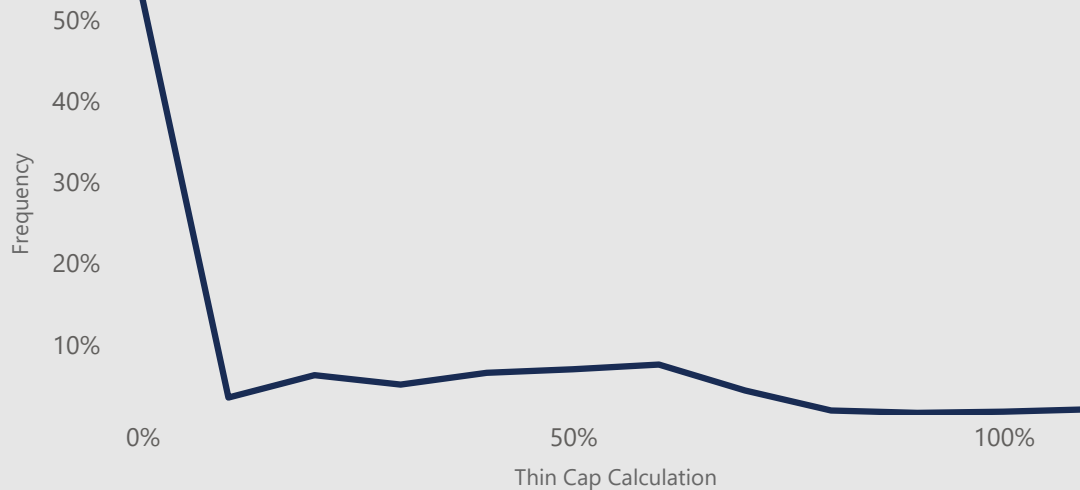


Out of **713** how many responded **YES** to...



#### Distribution of Groups: New Thin Capitalisation Calculation

(excl. Financial Services)



# International Questionnaire

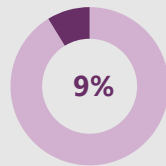
## 2019 income year summary

663 foreign-owned groups (banks and insurers excluded)

100% response rate

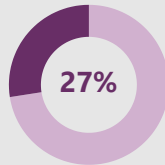
Out of 663 how many responded YES to...

Transactions with associated persons resident in low tax jurisdictions



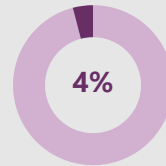
58 groups

Tax governance specifically for New Zealand



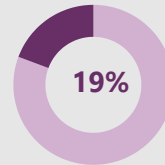
182 groups

Guarantee fee paid to a non-resident associated person



27 groups

Restructured in response to anti-BEPS measures



128 groups

## Highest Ultimate Ownership

(excl. Foreign Syndicates)



USA

142  
(54 Immediate)



Japan

64  
(26 Immediate)



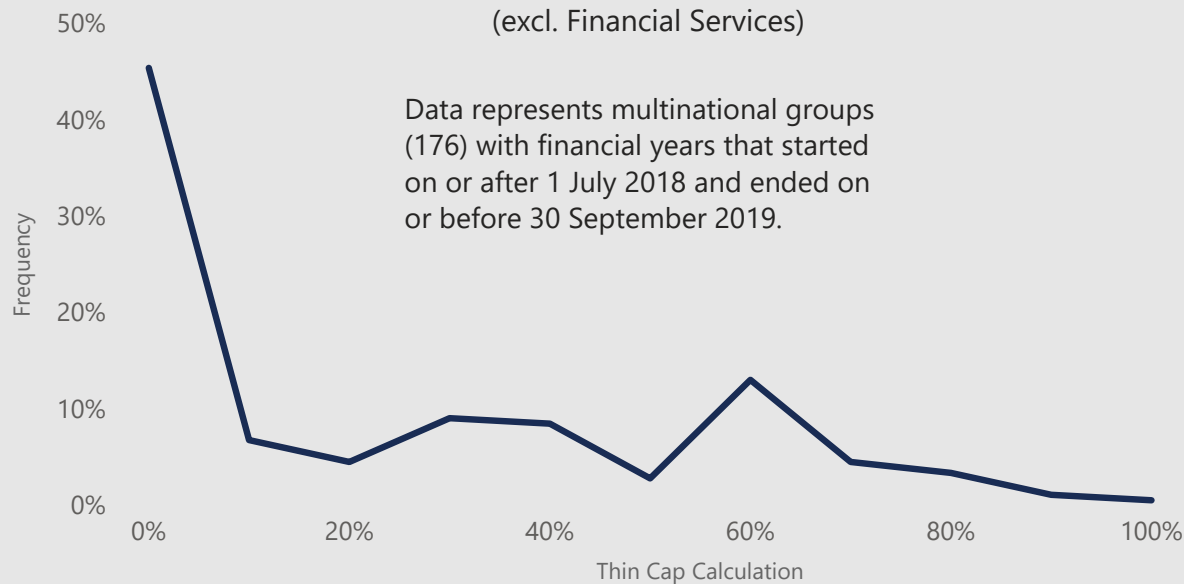
Australia

122  
(293 Immediate)

## Distribution of Groups: New Thin Capitalisation Calculation

(excl. Financial Services)

Data represents multinational groups (176) with financial years that started on or after 1 July 2018 and ended on or before 30 September 2019.



24%



Distributors / Wholesalers

14%



Manufacturing (excl. Food and Beverage)

8%



Food and Beverage

## Largest Industries

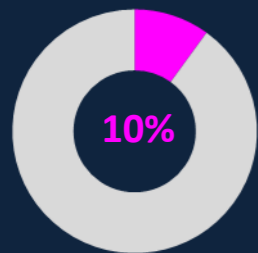
# International Questionnaire [UNCLASSIFIED]

## 2018 income year summary

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

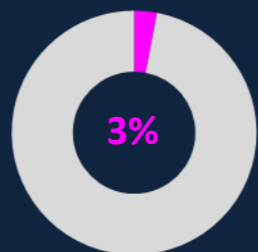
Out of 623 how many responded **YES** to...

Transactions with associated persons resident in certain low tax jurisdictions



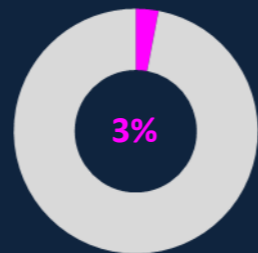
60 groups

Material structural changes in the 2018 income year



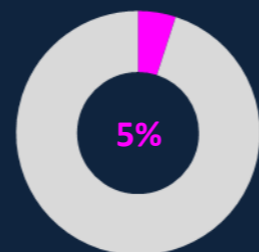
18 groups

Guarantee fee paid to a non-resident associated person



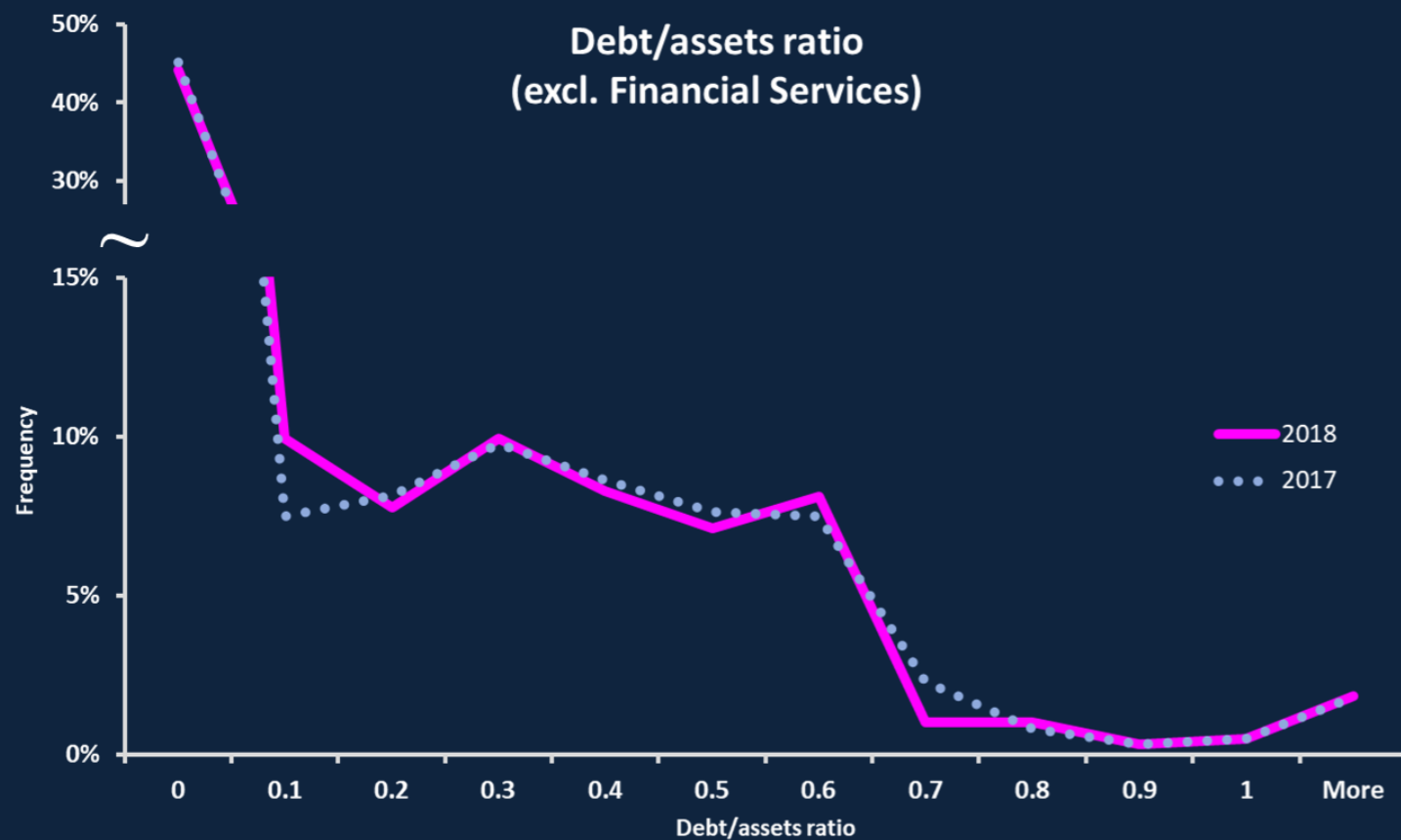
21 groups

Hybrid entities

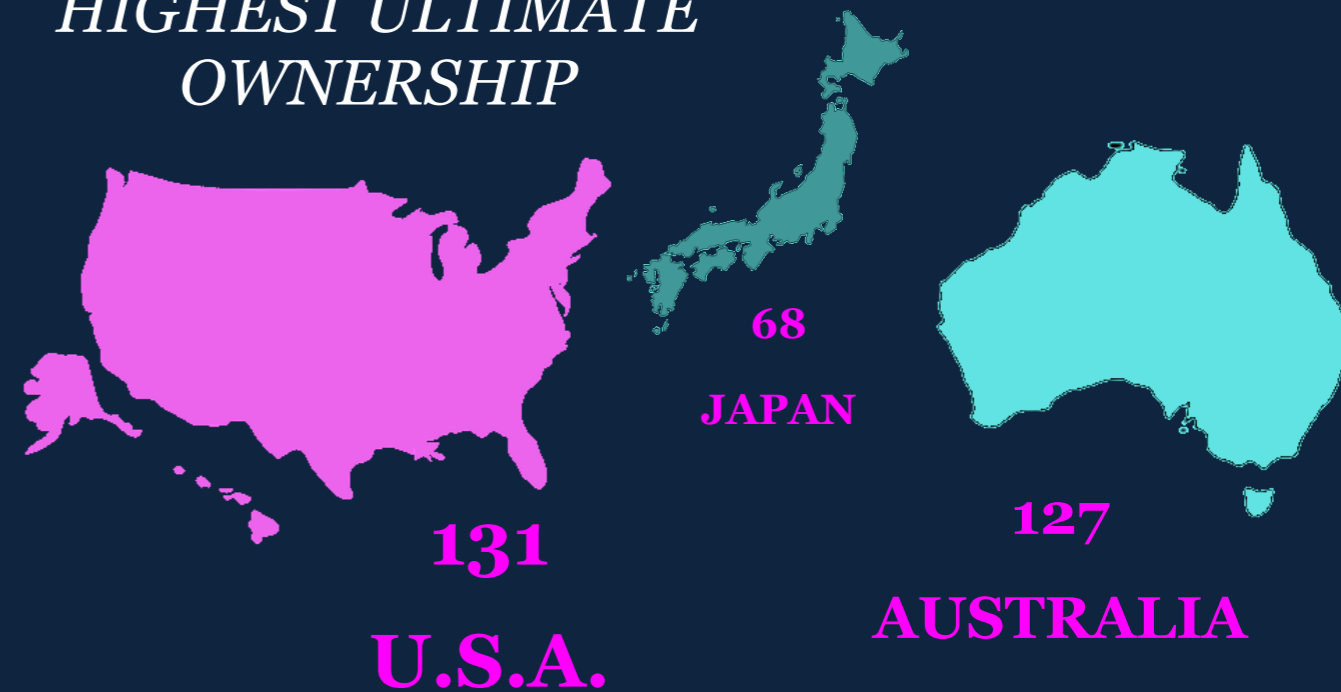


29 groups

Distribution of groups by thin cap percentage of New Zealand Group

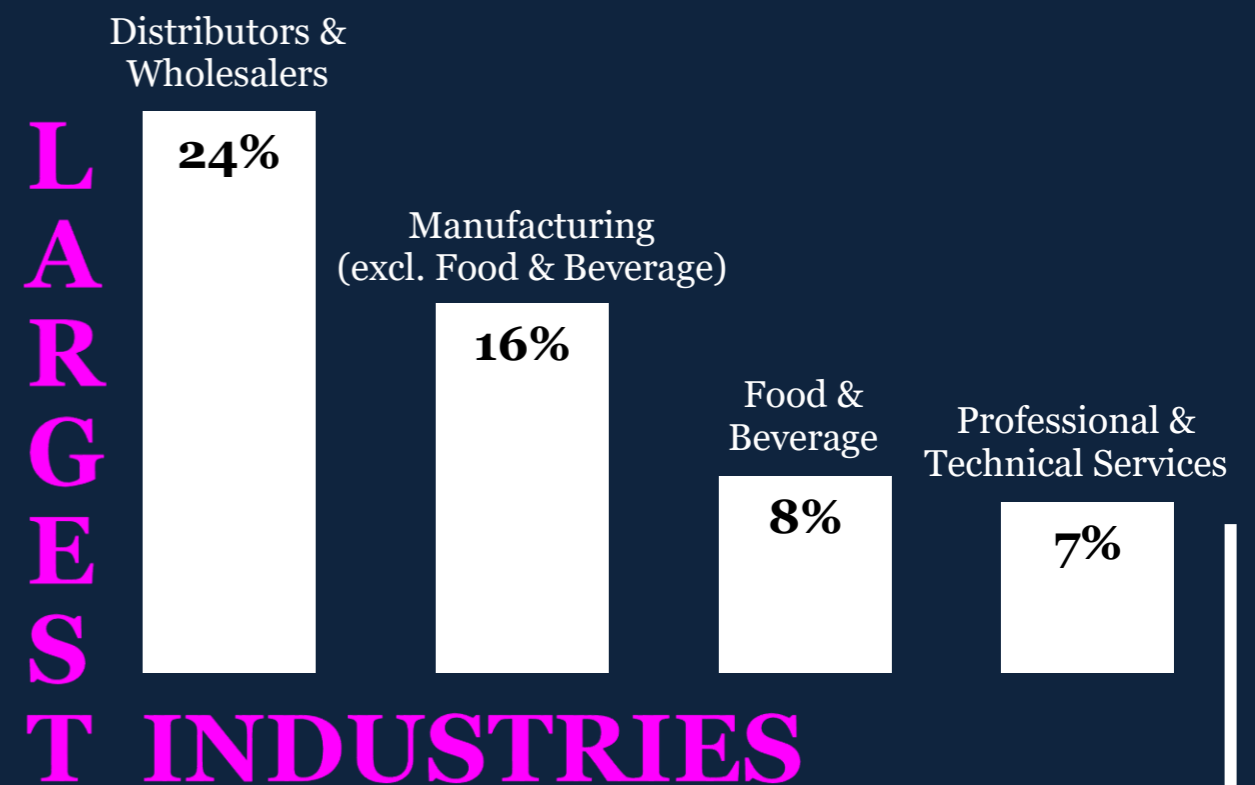


## HIGHEST ULTIMATE OWNERSHIP



168 groups paid royalties out of which

62 groups were rated high using the 25% rule



# International Questionnaire [UNCLASSIFIED]

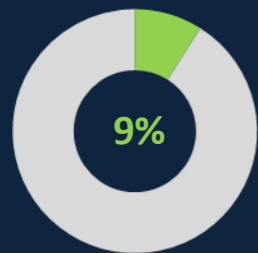
## 2017 income year summary

646 foreign-owned groups - 100% response rate

(banks and insurers excluded)

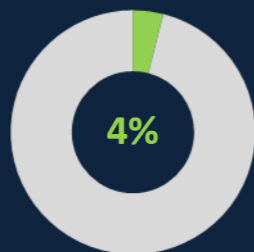
Out of 646 how many responded **YES** to...

Transactions with associated persons resident in certain low tax jurisdictions



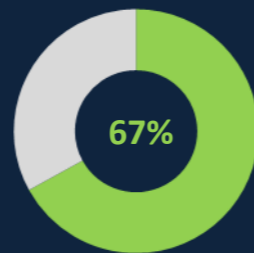
60 groups

Material structural changes in the 2017 income year



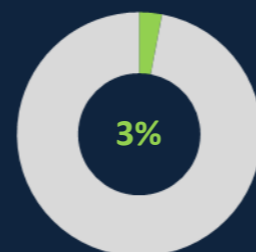
24 groups

Global group participates in Country-by-Country Reporting



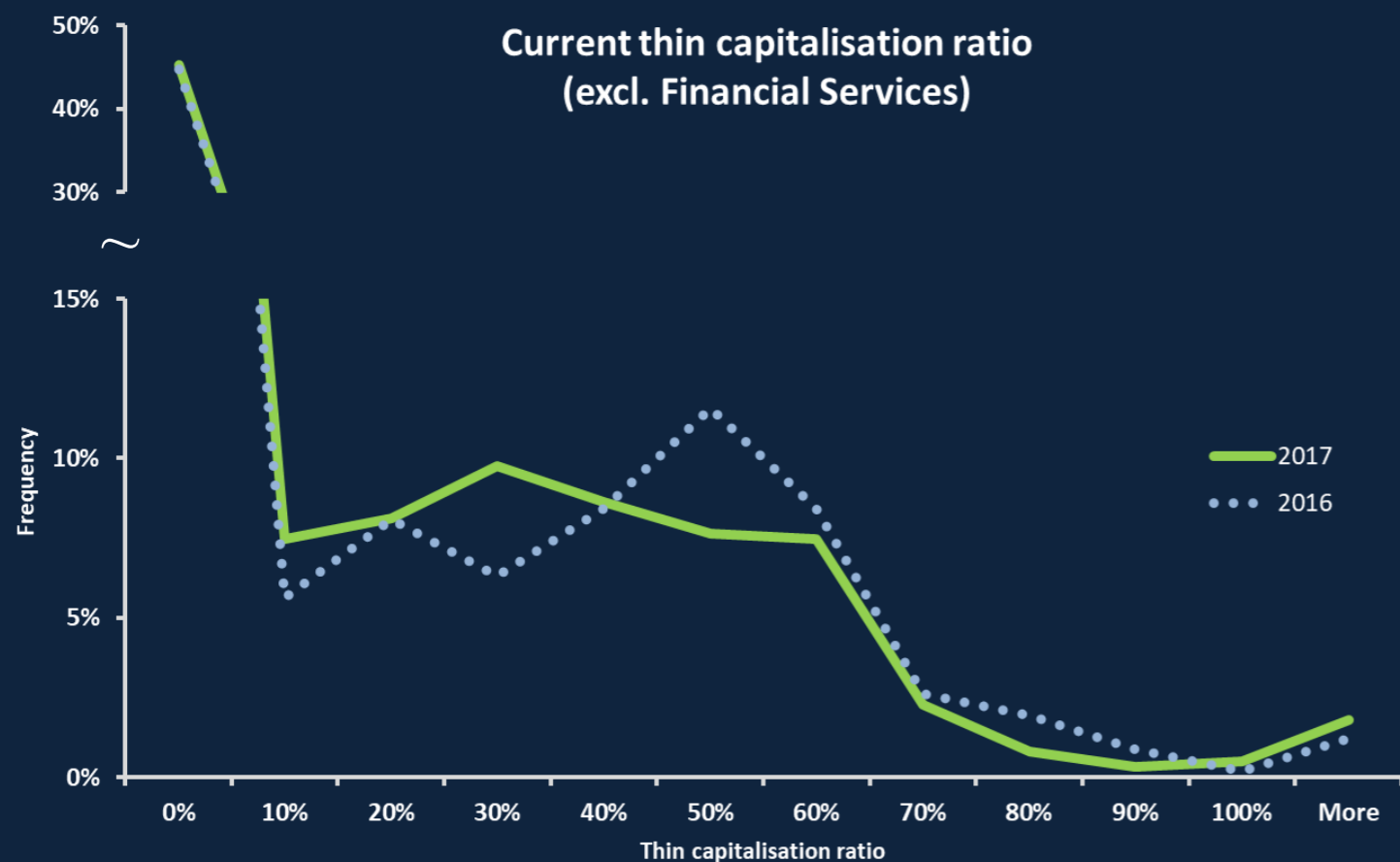
432 groups

Hybrid entities

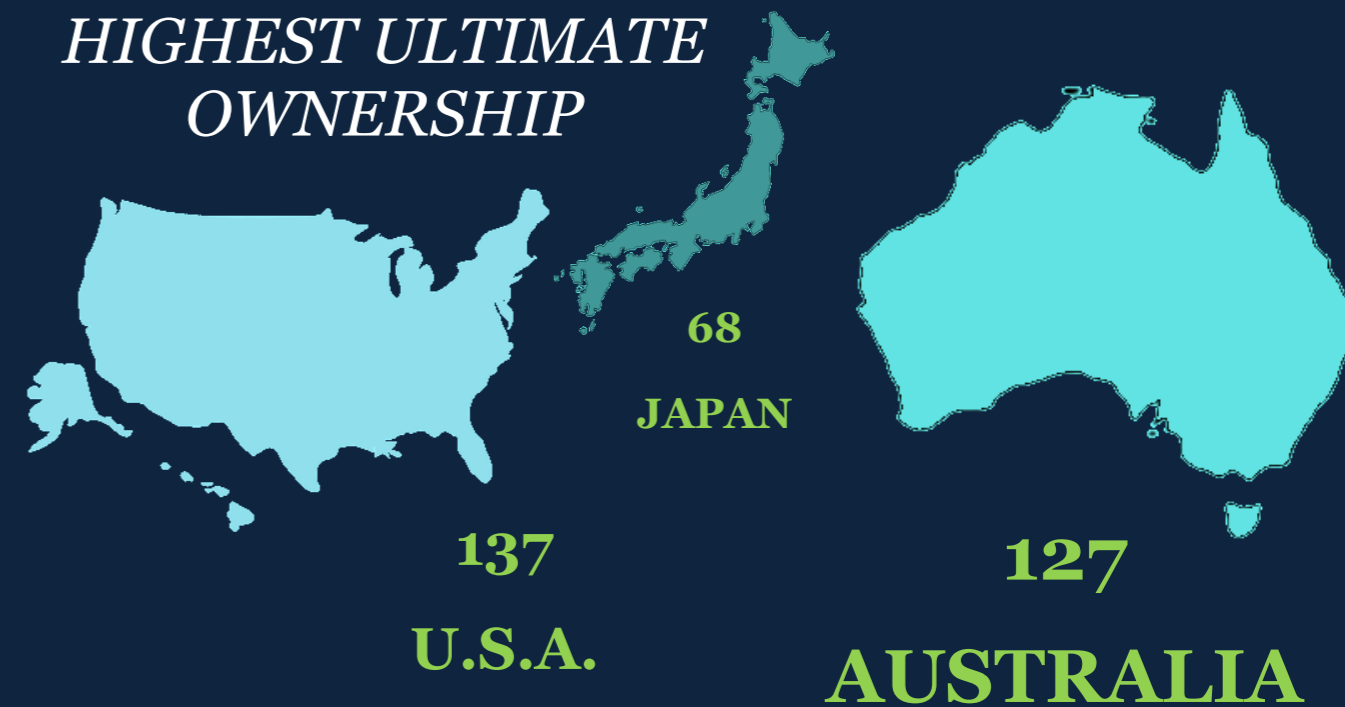


19 groups

Distribution of groups by thin cap percentage of New Zealand Group

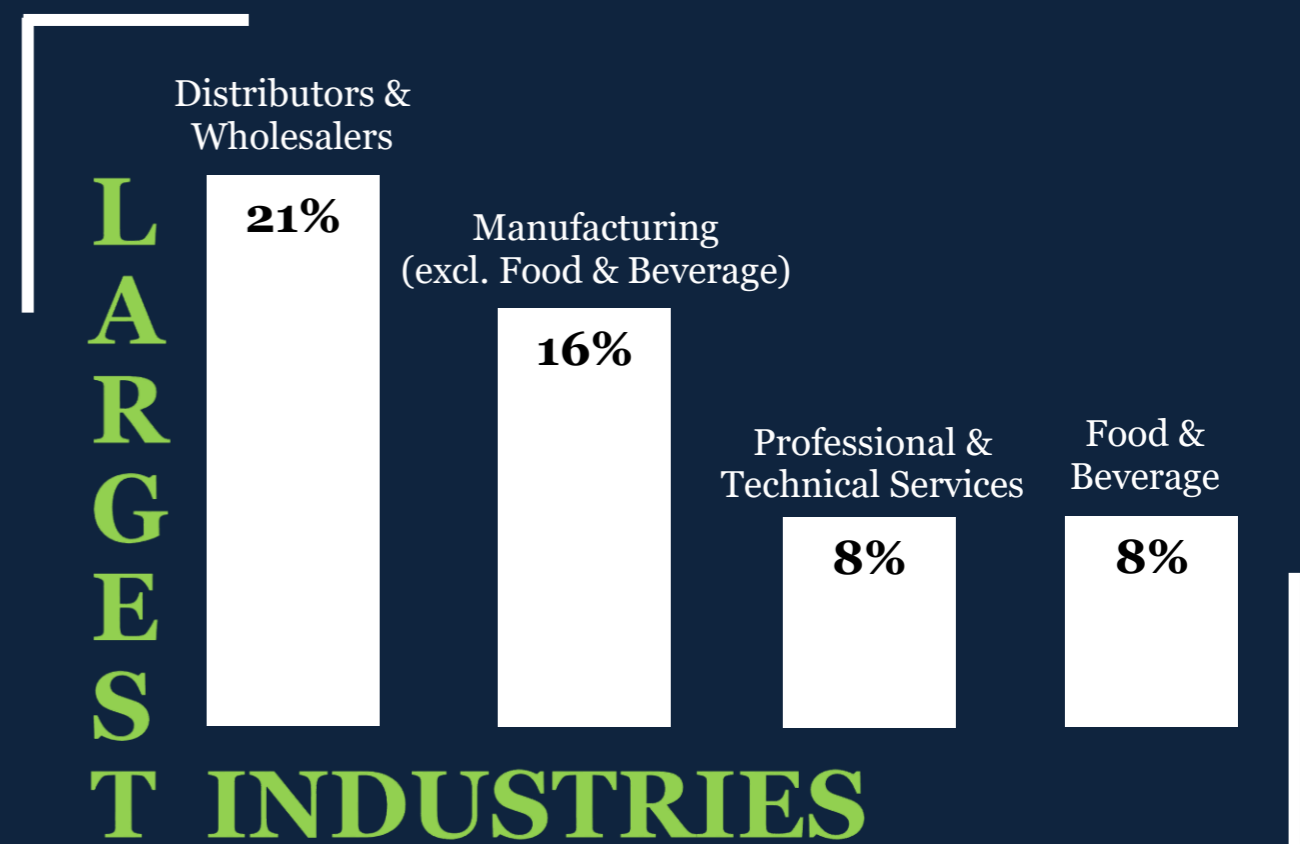


## HIGHEST ULTIMATE OWNERSHIP



166 groups paid royalties out of which

78 groups were rated high using the 25% rule



# International Questionnaire

## 2016 income year summary

594 foreign-owned groups - 100% response rate

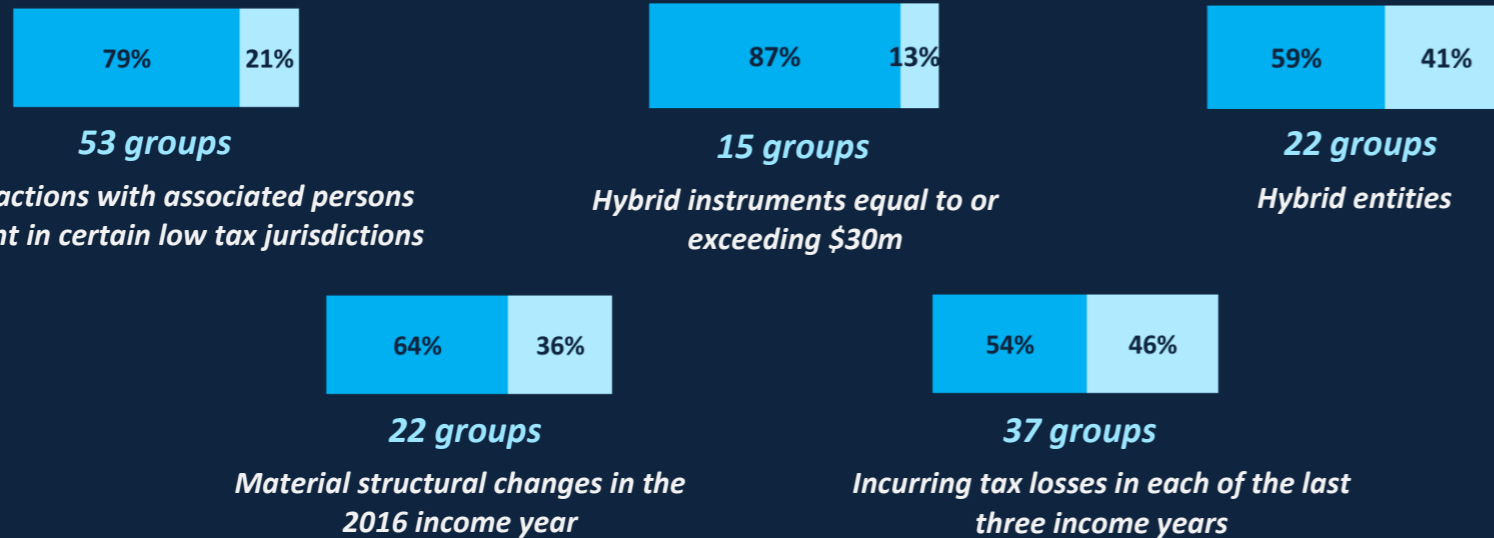
(banks and insurers excluded)

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...

■ % of groups with turnover greater than \$80 million  
■ % 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

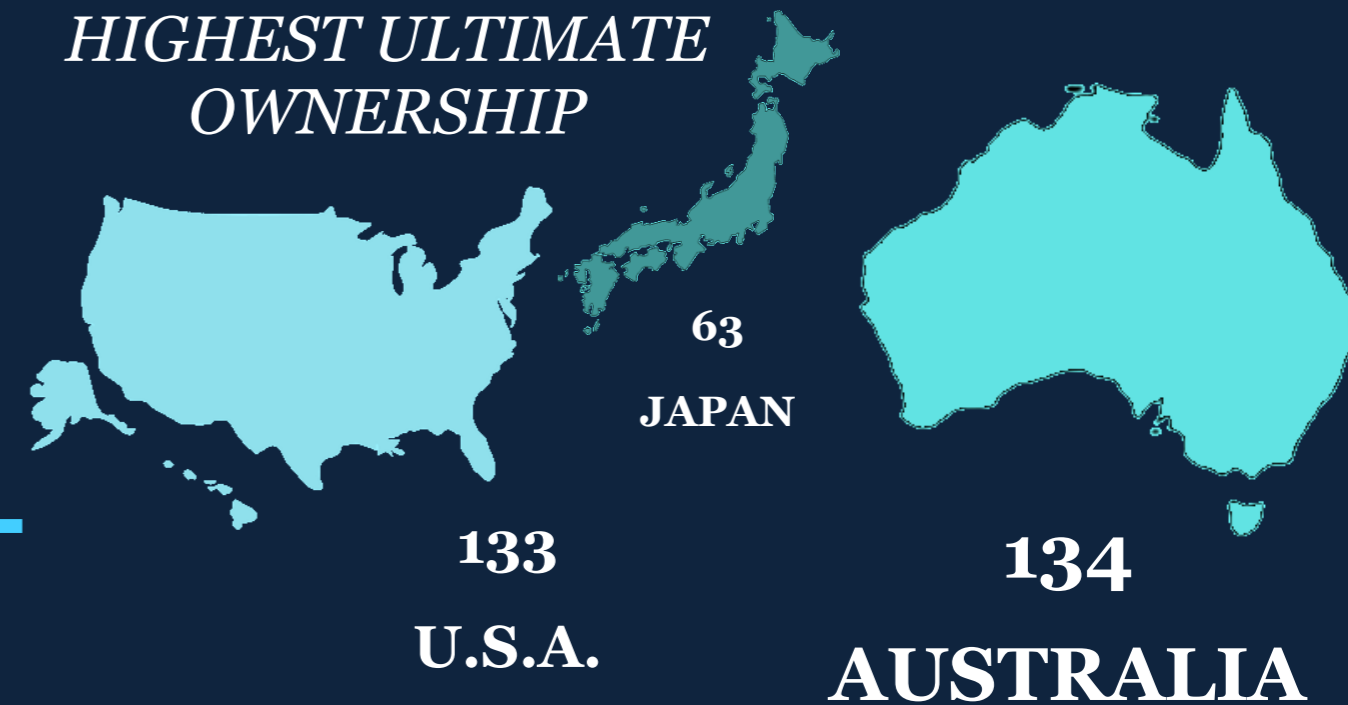
Total R&D/Gross Revenue

**0.30%**

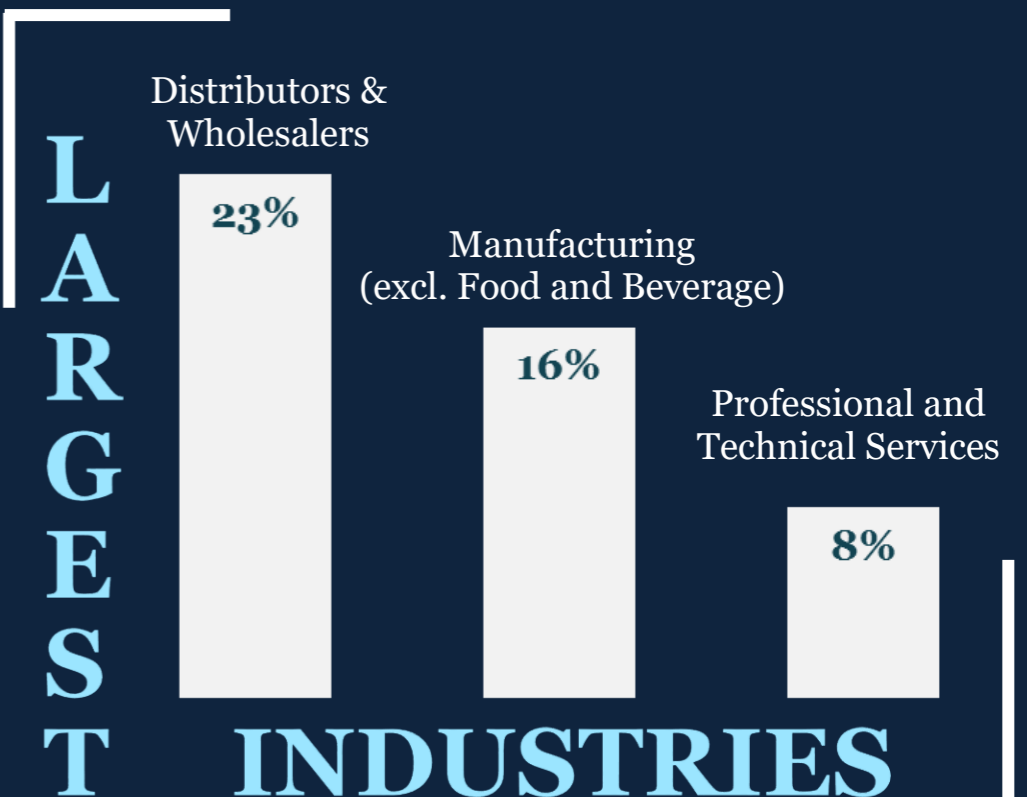
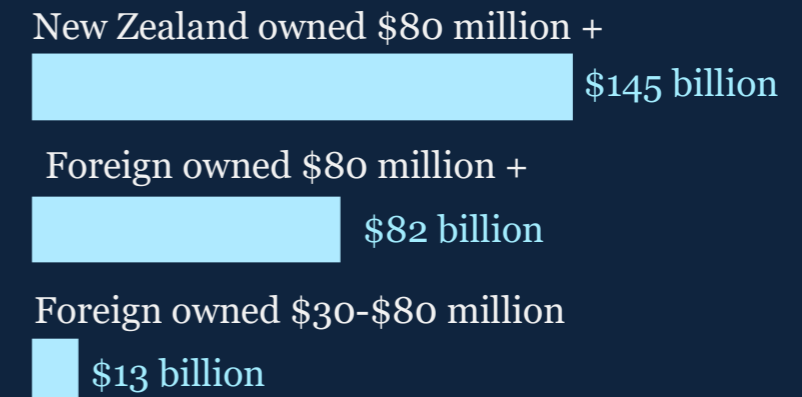
Total Intangibles/Total Assets

**11.71%**

### HIGHEST ULTIMATE OWNERSHIP



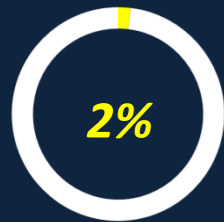
### TURNOVER BY POPULATION



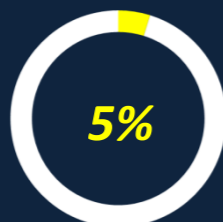
# International Questionnaire 2015 income year summary

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

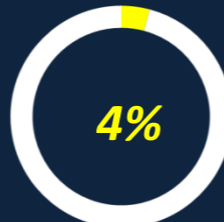
How many responded **YES** to...



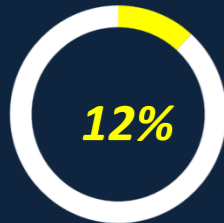
Material structural changes in the 2015 income year



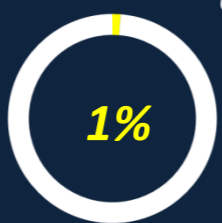
Hybrid instruments equal to or exceeding \$30m



Cost contribution/sharing arrangement



Transactions with associated persons resident in certain low tax jurisdictions



Hybrid entities

## HIGHEST ULTIMATE OWNERSHIP



59  
U.S.A.



39  
JAPAN



77  
AUSTRALIA

L  
A  
R  
G  
E  
S  
T

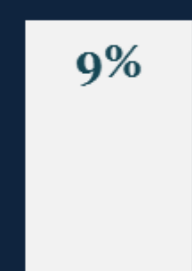
Distributors & Wholesalers



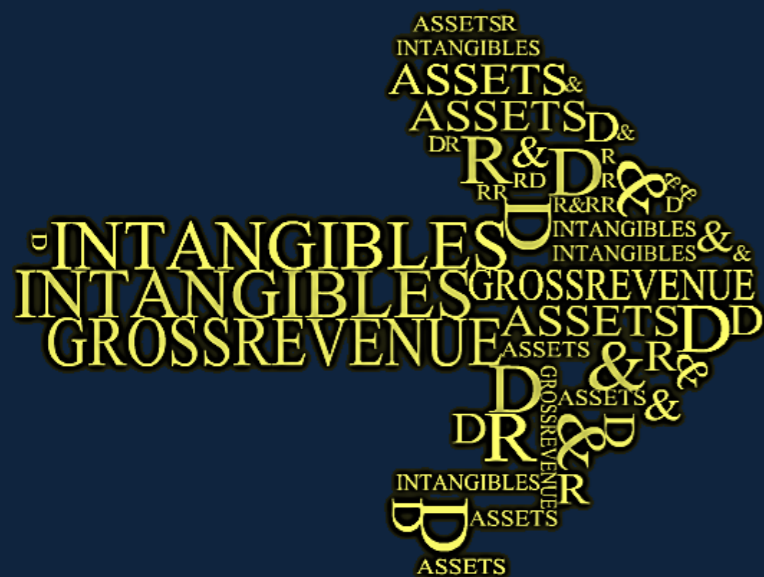
Manufacturing (excl. Food and Beverage)



Food and Beverage



## INDUSTRIES



Total R&D/Gross Revenue

0.13%

Total Intangibles/Total Assets

17.34%

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

## HIGHEST ULTIMATE OWNERSHIP



55

U.S.A.



39

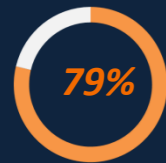
JAPAN



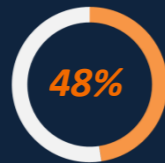
77

AUSTRALIA

### How many responded YES to...



Transfer pricing documentation



Tax governance documentation



Cash pooling arrangement



Cost contribution/sharing arrangement



Material structural changes in the last 3 income years



Hybrid instruments with a face value of \$30m or over



Hybrid entities within the group



Factoring or securitisation arrangement



Total R&D/Gross Revenue

0.15%

Total Intangibles/Total Assets

17.18%

Total Insurance or Re-insurance/Gross Revenue 0.11%

LARGEST

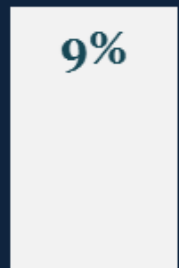
Distributors & Wholesalers



Manufacturing (excl. Food and Beverage)



Food and Beverage



INDUSTRIES

14

groups exceeded the 60% thin capitalisation threshold

198 groups had net finance costs