

International Questionnaire

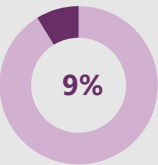
2019 income year summary

663 foreign-owned groups (banks and insurers excluded)

100% response rate

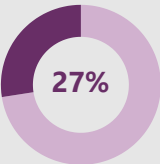
Out of 663 how many responded YES to...

Transactions with associated persons
resident in low tax jurisdictions



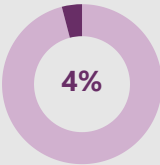
58 groups

Tax governance specifically
for New Zealand



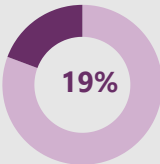
182 groups

Guarantee fee paid to a
non-resident associated person



27 groups

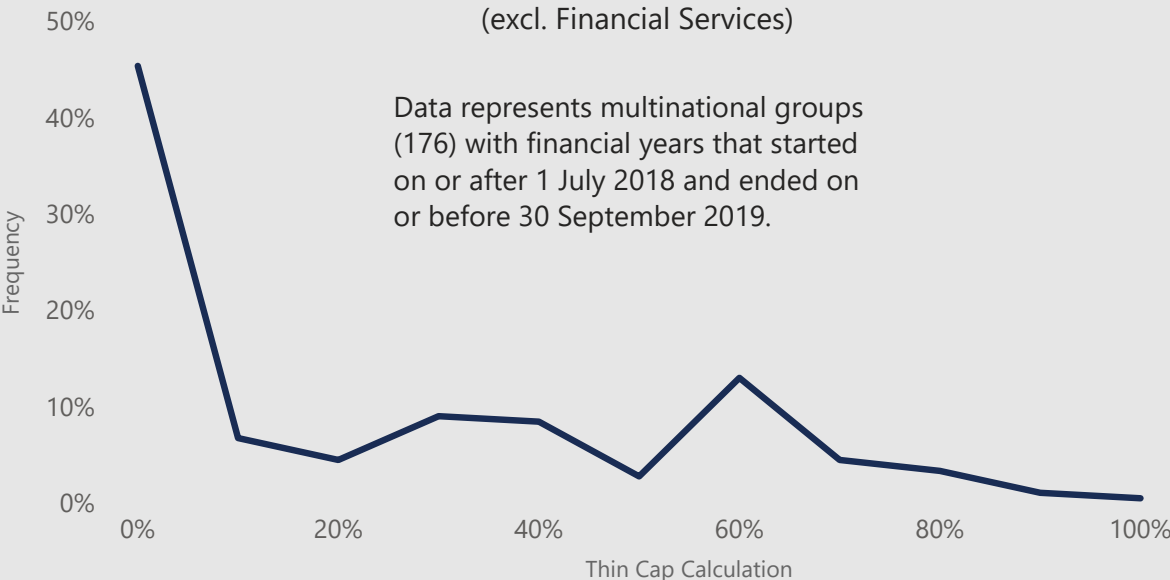
Restructured in response to
anti-BEPS measures



128 groups

Distribution of Groups: New Thin Capitalisation Calculation

(excl. Financial Services)



Highest Ultimate Ownership

(excl. Foreign Syndicates)



142
(54 Immediate)



64
(26 Immediate)



122
(293 Immediate)

24%



Distributors /
Wholesalers

14%



Manufacturing (excl.
Food and Beverage)

8%



Food and Beverage

Largest Industries

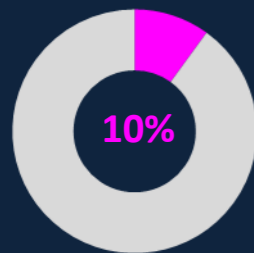
International Questionnaire

2018 income year summary

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

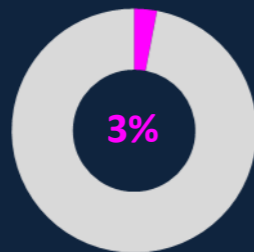
Out of 623 how many responded **YES** to...

Transactions with associated persons
resident in certain low tax jurisdictions



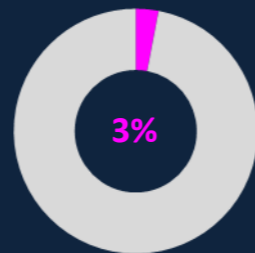
60 groups

Material structural changes
in the 2018 income year



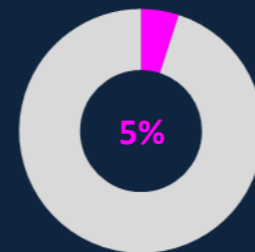
18 groups

Guarantee fee paid to a non-
resident associated person



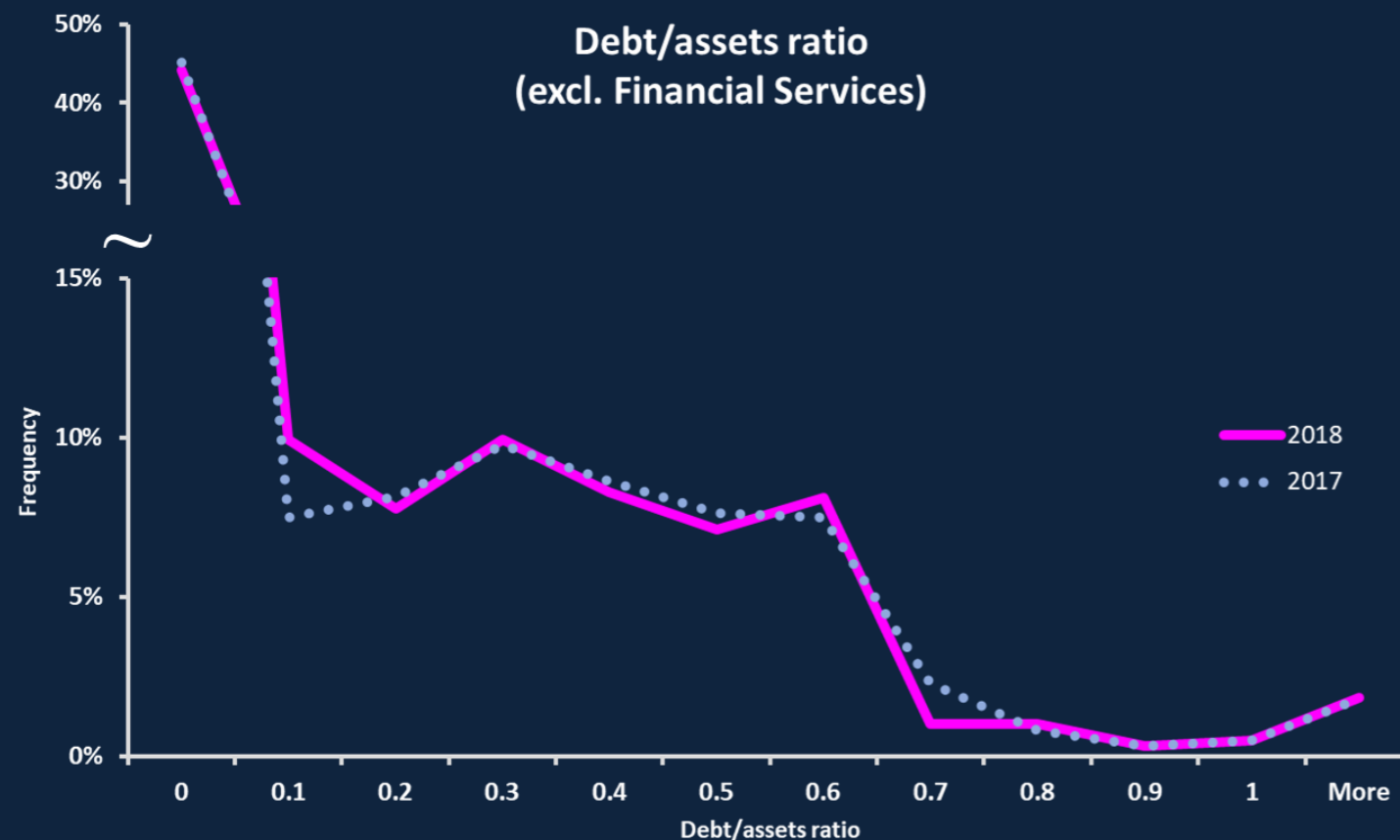
21 groups

Hybrid entities

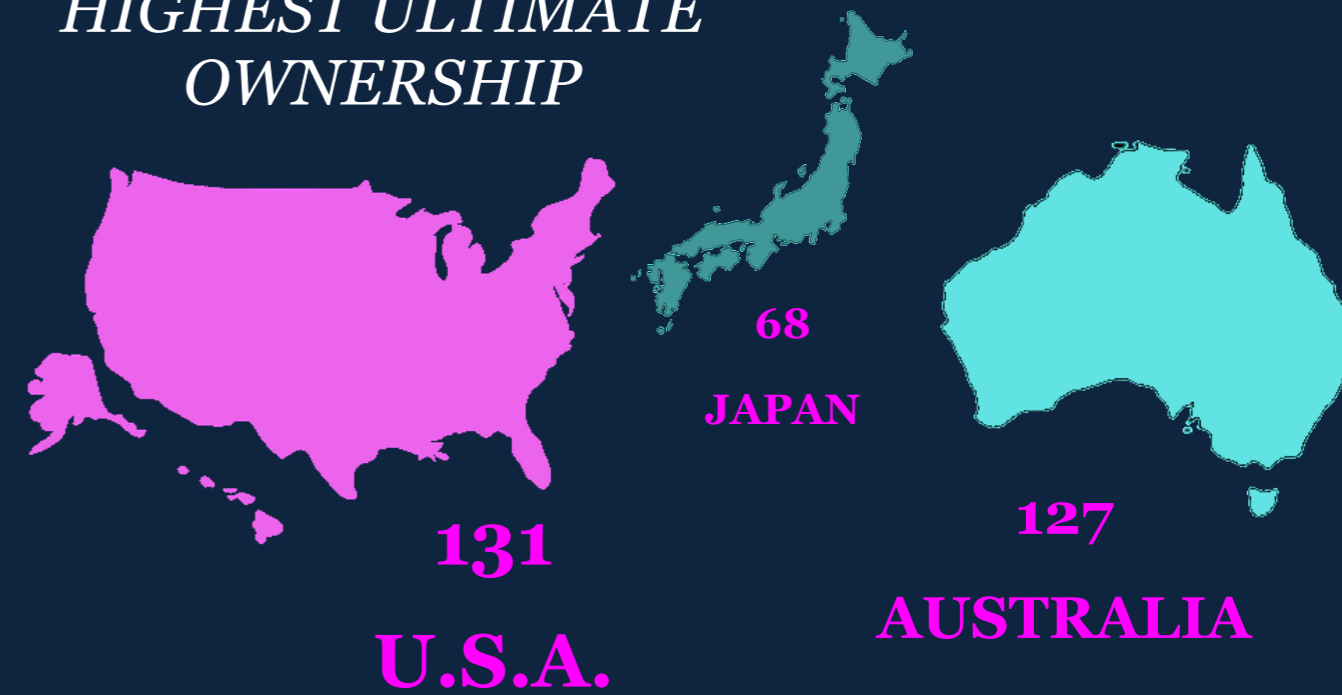


29 groups

Distribution of groups by thin cap percentage of New Zealand Group

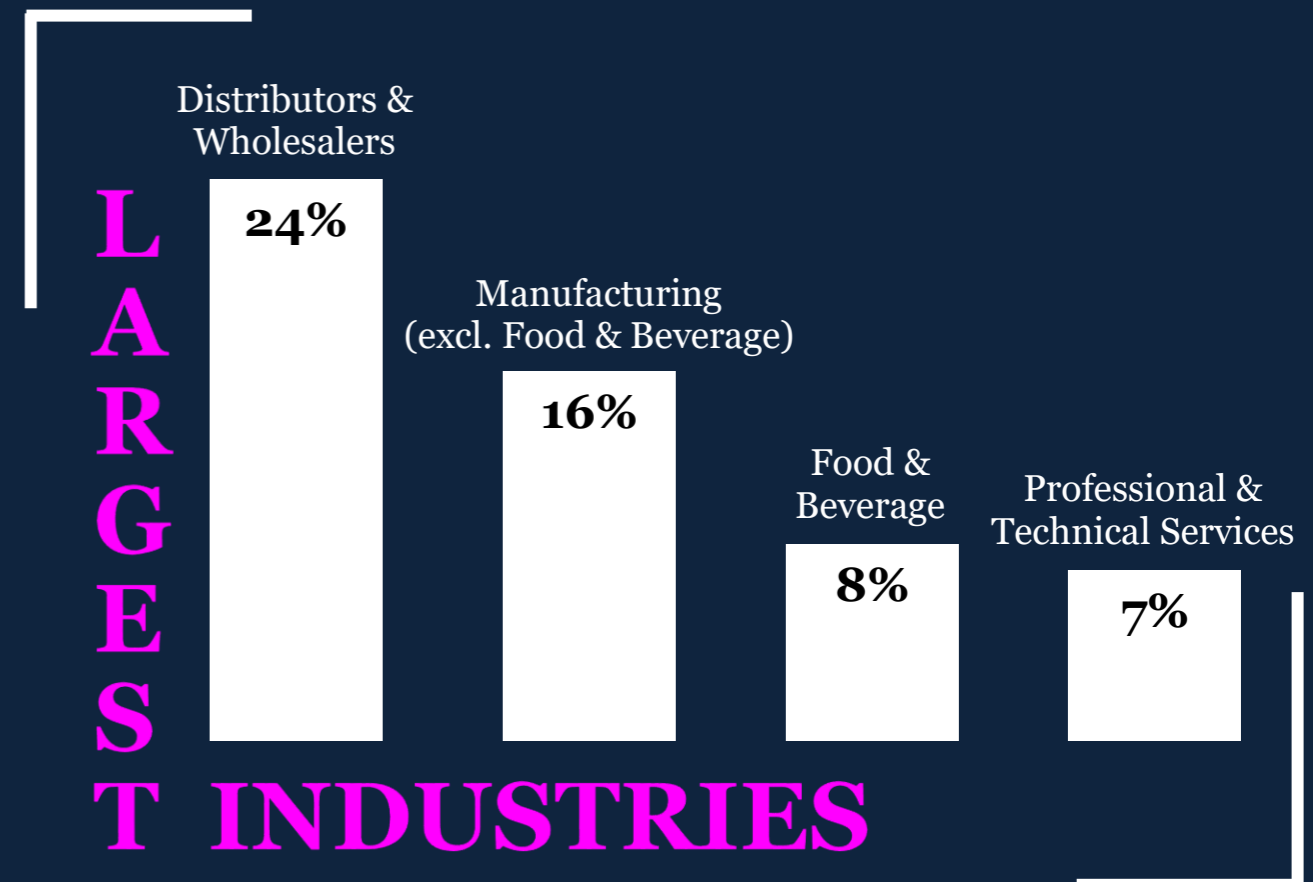


HIGHEST ULTIMATE
OWNERSHIP



168 groups paid royalties
out of which

62 groups were rated high
using the 25% rule



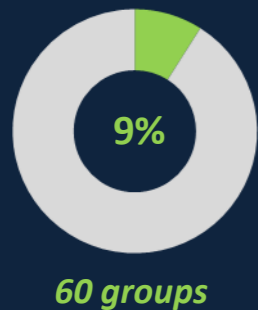
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2017 income year summary

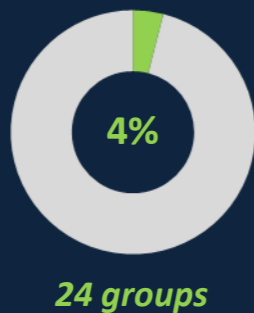
646 foreign-owned groups - 100% response rate
(banks and insurers excluded)

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

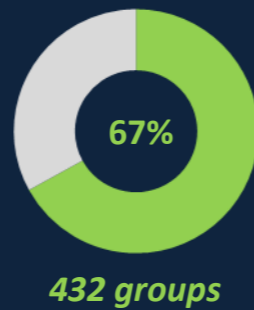
Transactions with associated persons
resident in certain low tax jurisdictions



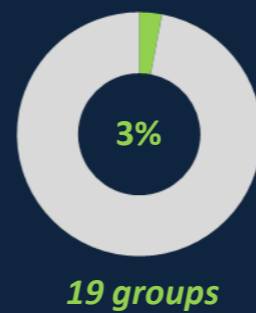
Material structural changes
in the 2017 income year



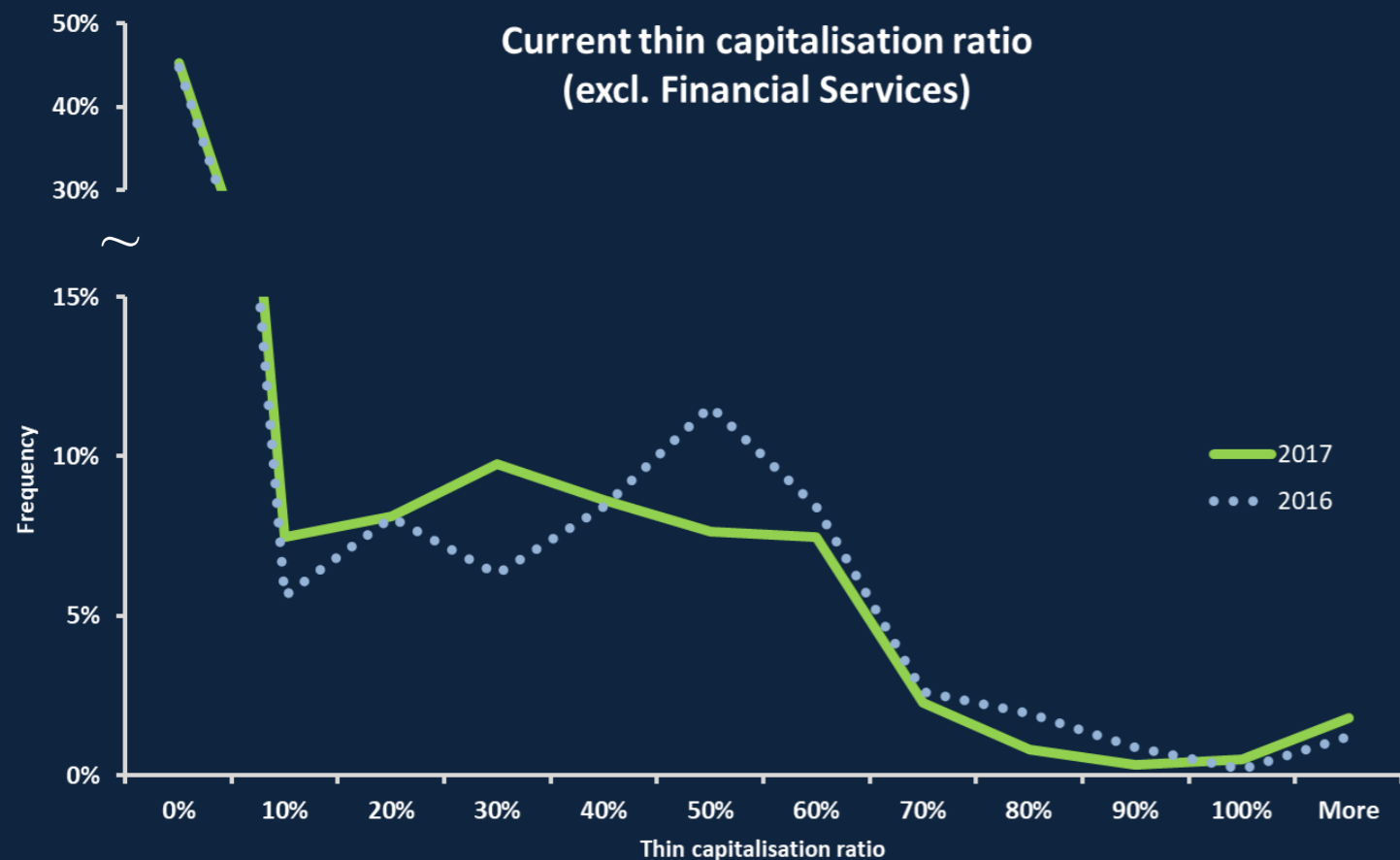
Global group participates in
Country-by-Country Reporting



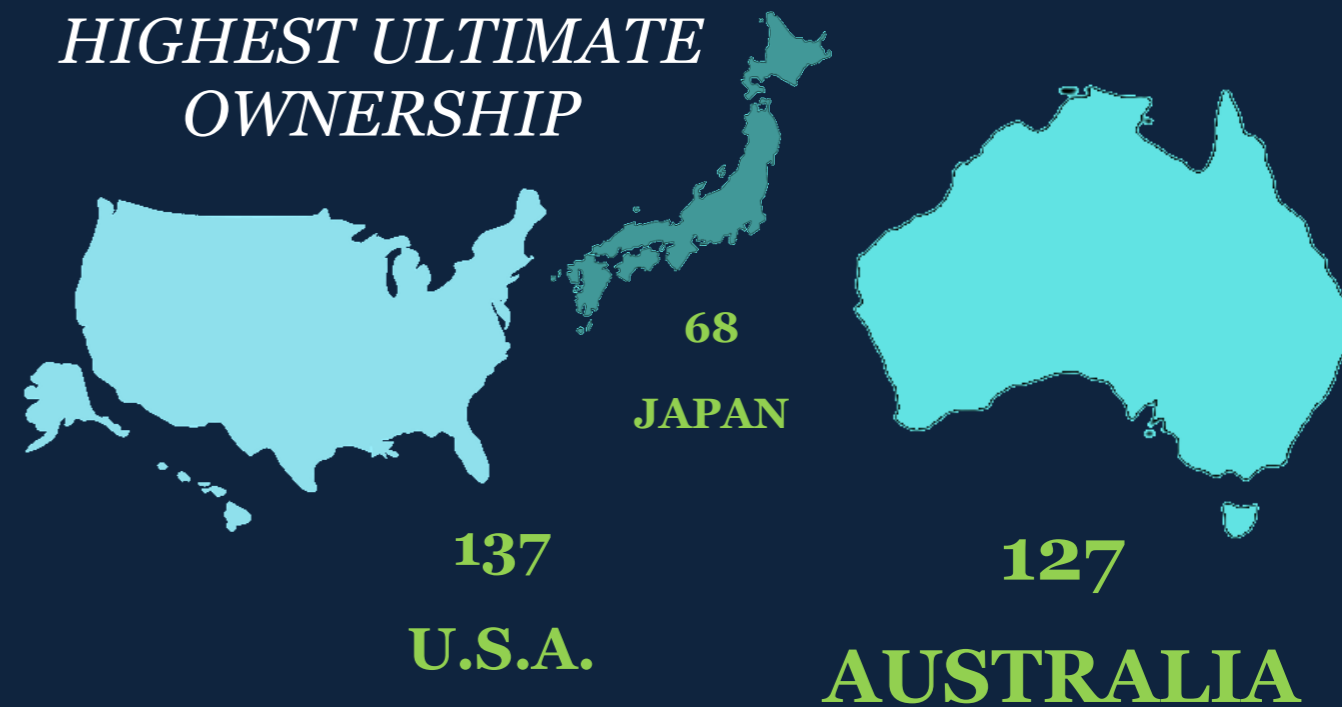
Hybrid entities



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

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Distributors &
Wholesalers

21%

Manufacturing
(excl. Food & Beverage)

16%

Professional &
Technical Services

8%

Food &
Beverage

8%



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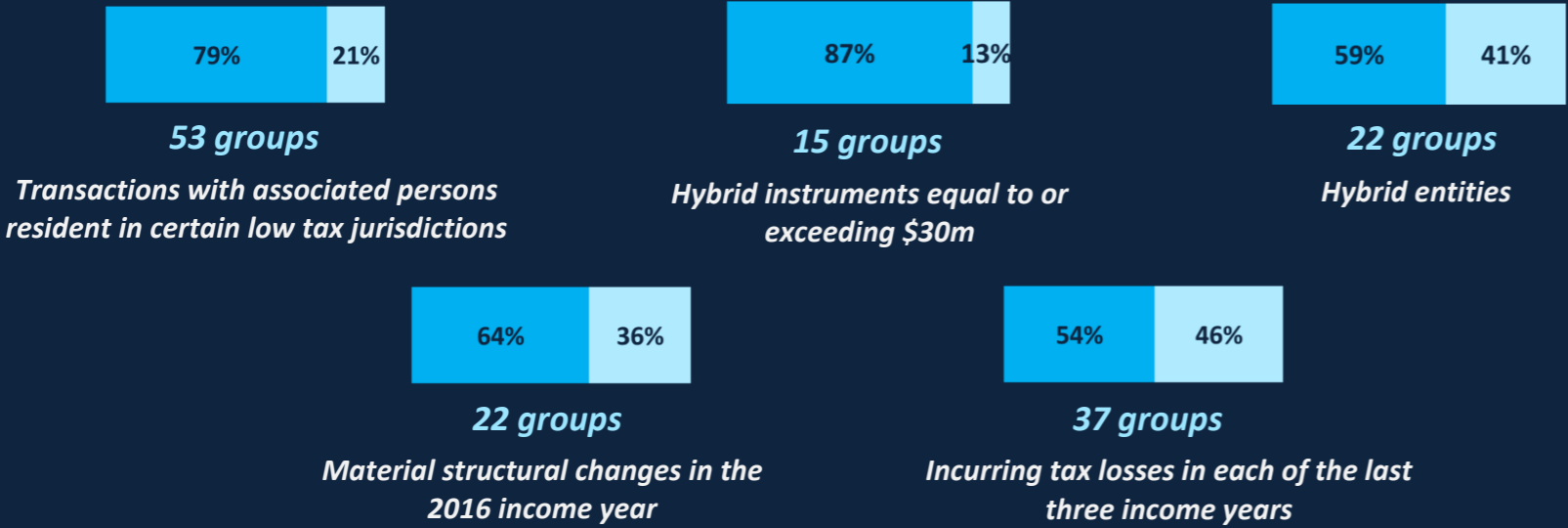
2016 income year summary

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



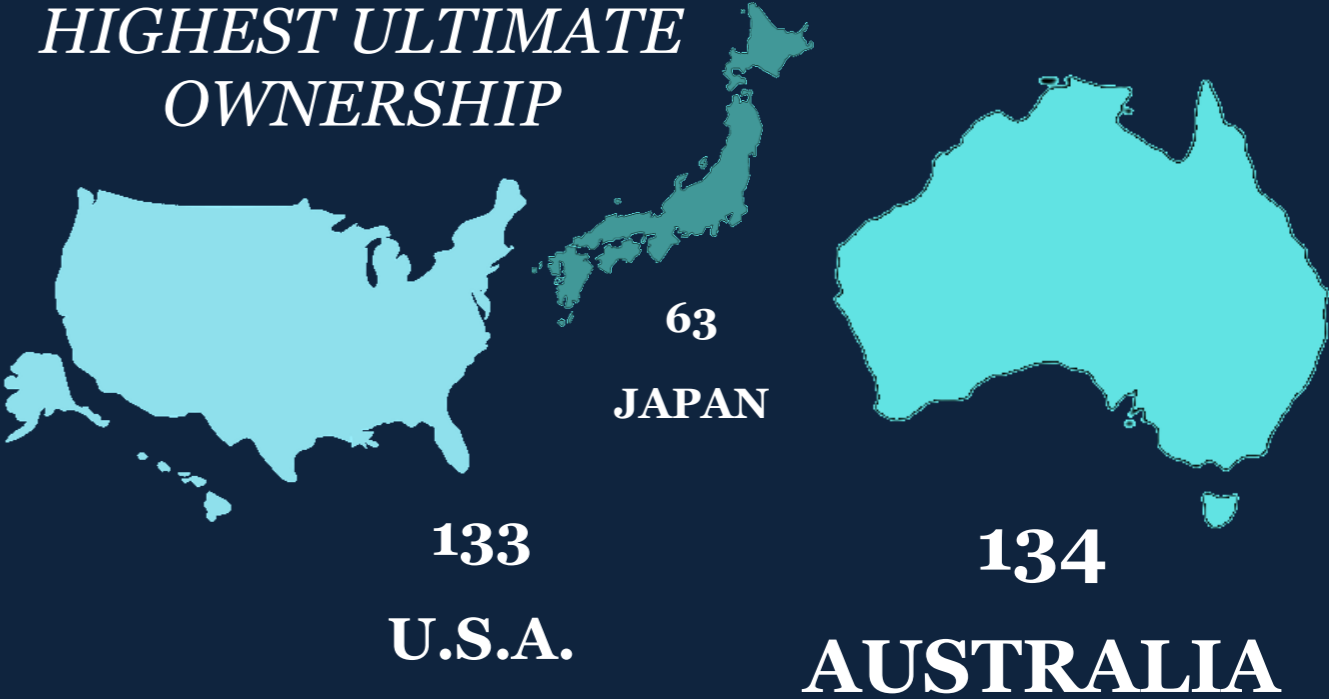
Total number of groups by thin cap percentage of New Zealand Group
(excludes financial services)

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

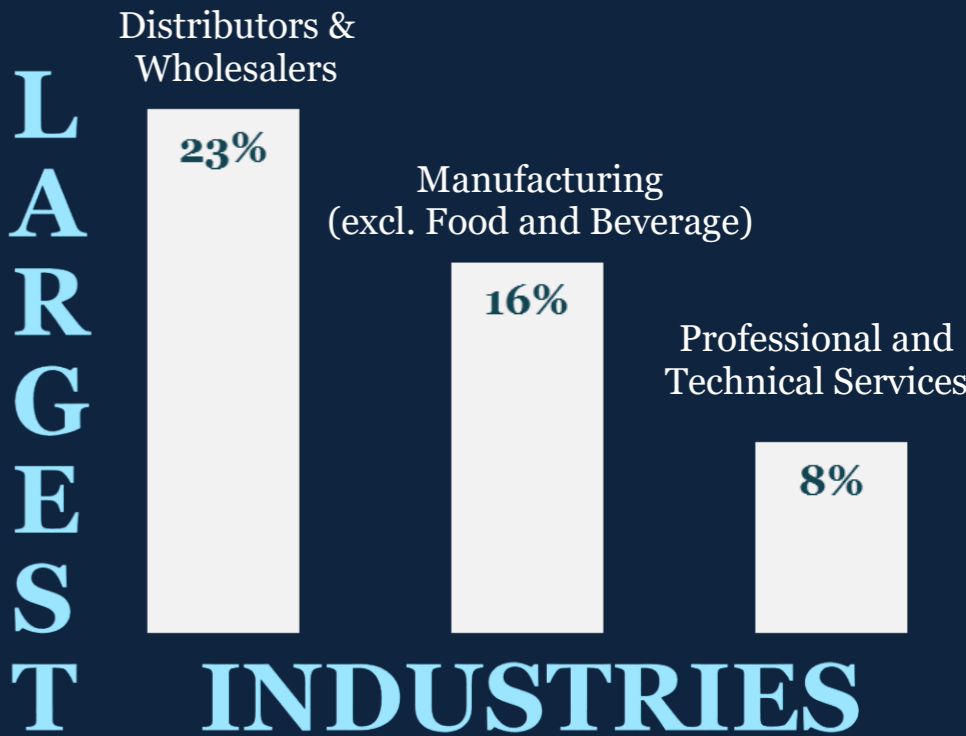
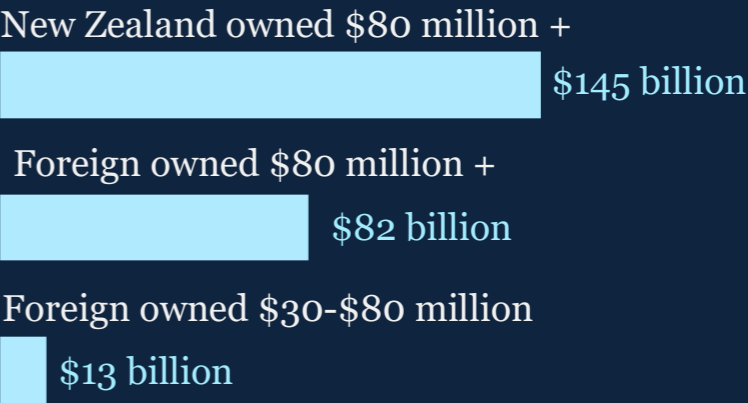
Total R&D/Gross Revenue
0.30%

Total Intangibles/Total Assets
11.71%

HIGHEST ULTIMATE OWNERSHIP



TURNOVER BY POPULATION

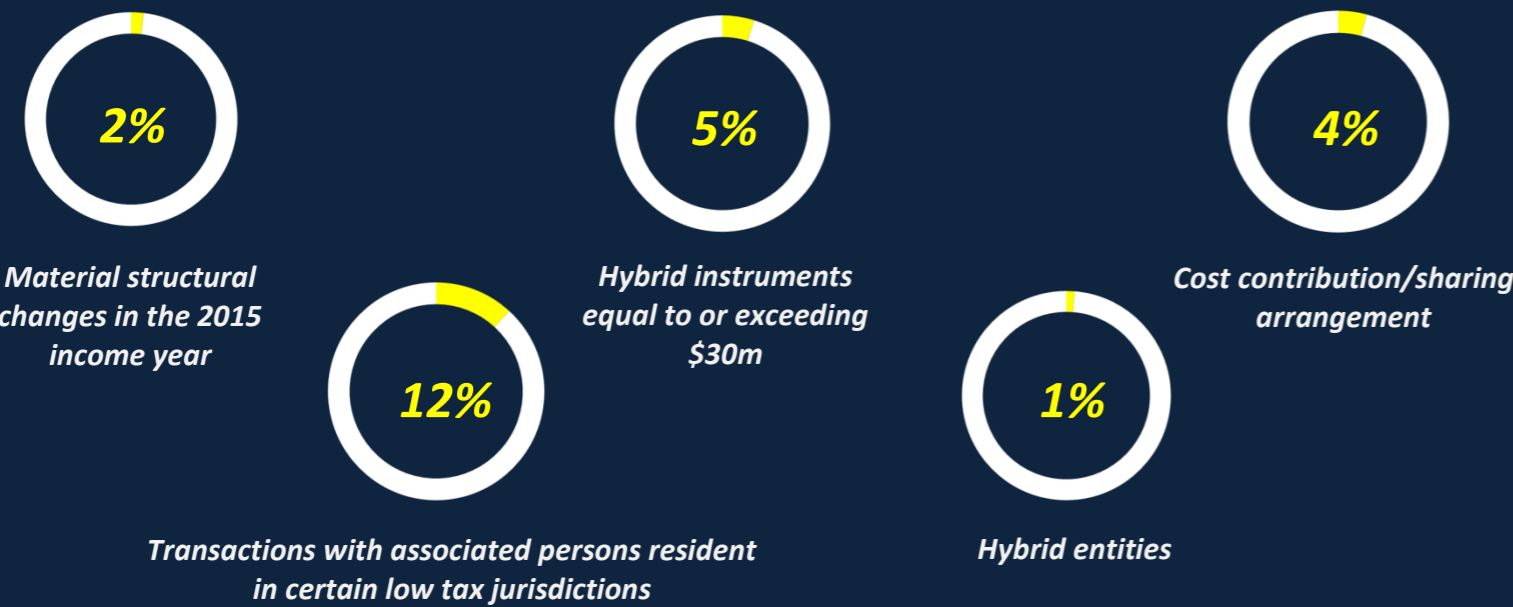


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2015 income year summary

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

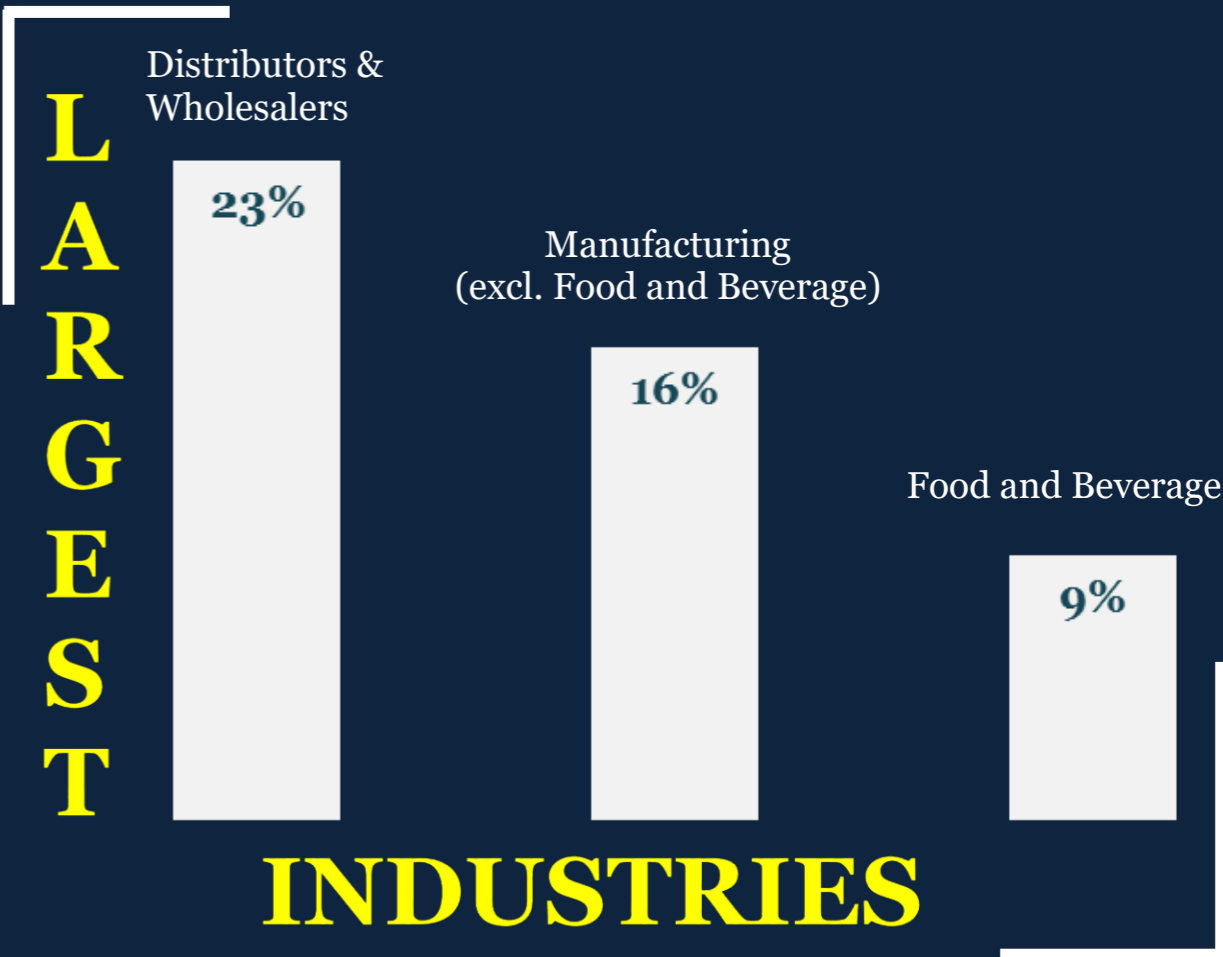
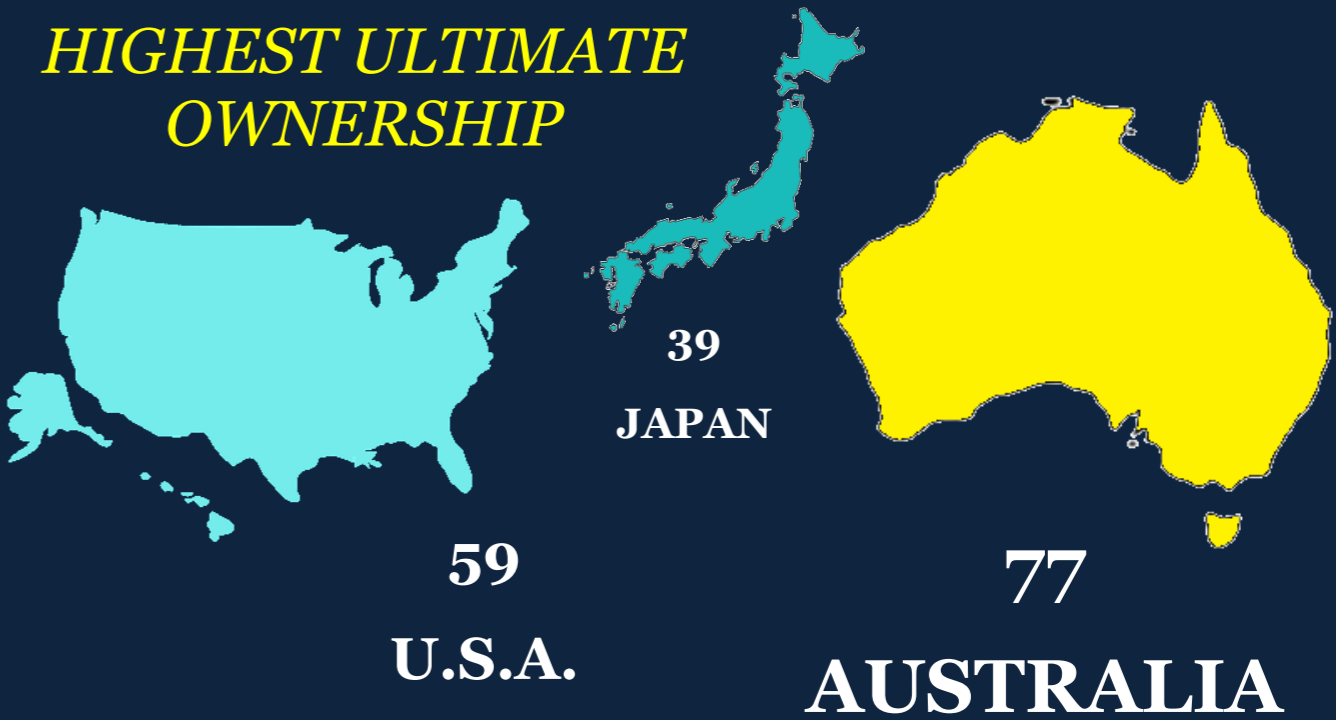
How many responded **YES** to...



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**

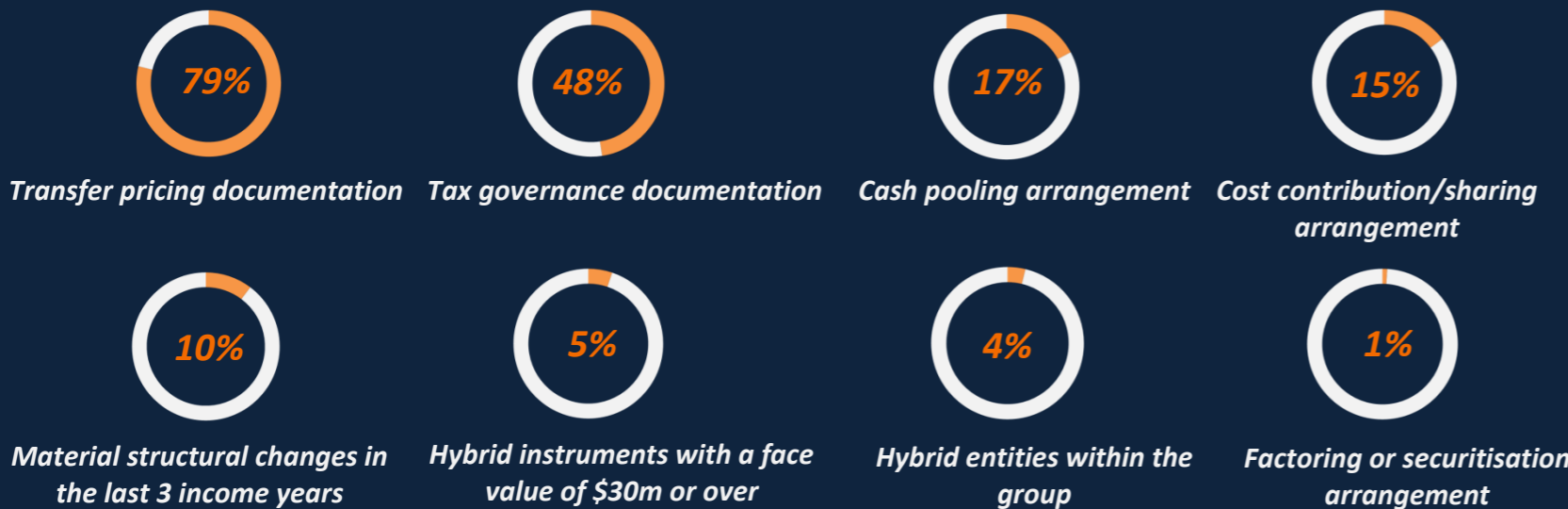
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2014 income year summary

292 foreign-owned groups
(banks and insurers excluded)

100% response rate

How many responded YES to...

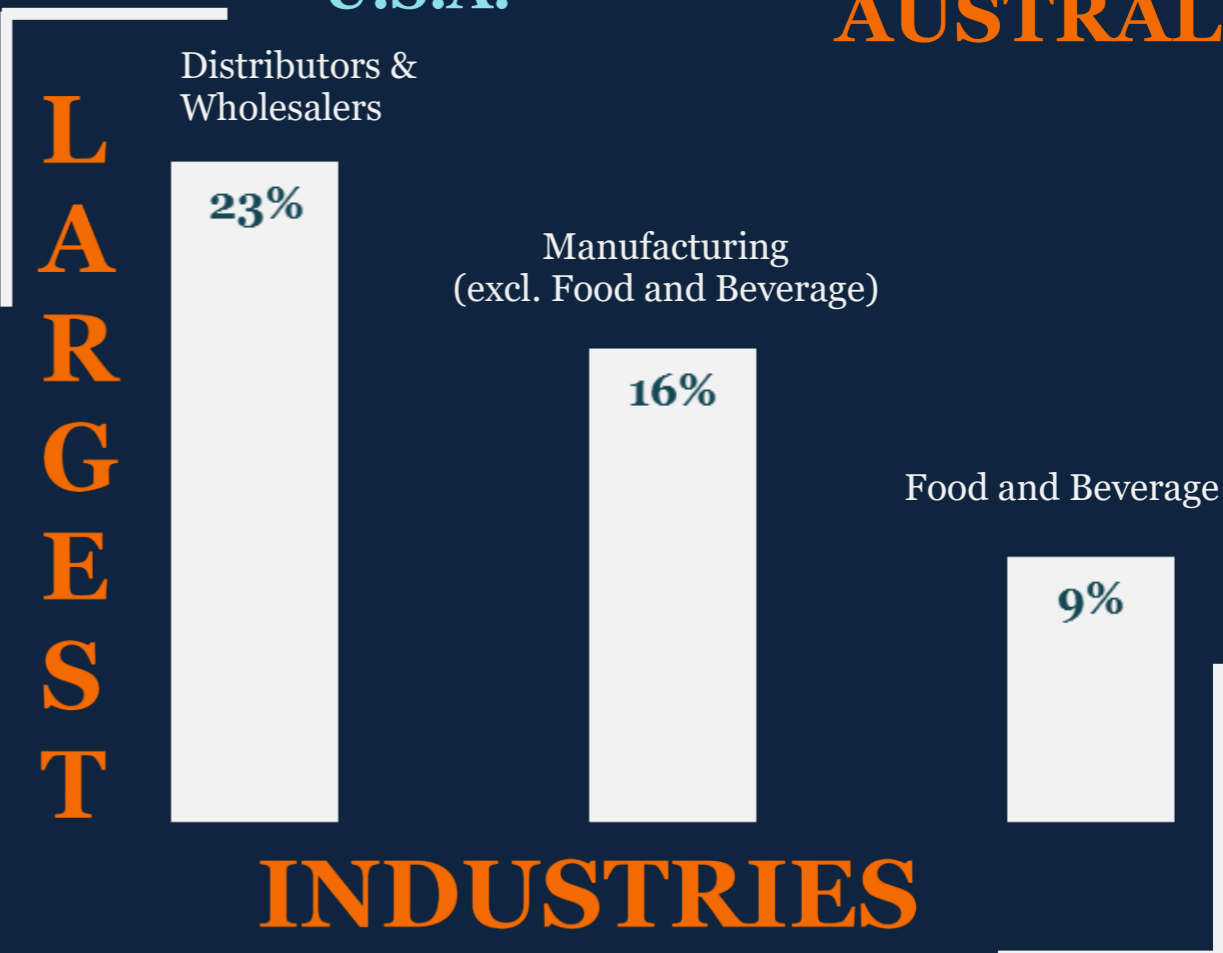
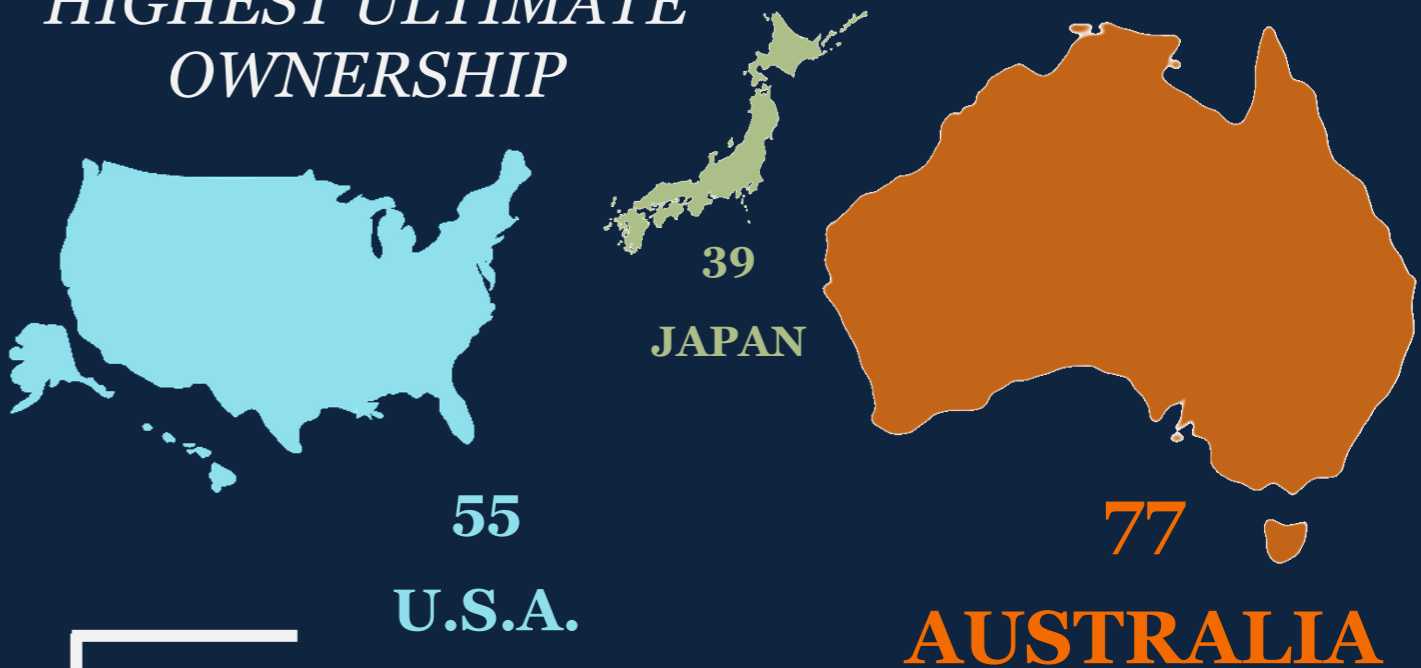


Total R&D/Gross Revenue
0.15%

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