MACQUARIE

Tax Transparency

Macquarie Group

Year ended 31 March 2017



Tax Transparency

Macquarie supports the Australian Government's commitment for greater Australian corporate tax transparency, as actioned through the Australian Board of Taxation's voluntary Tax Transparency Code (the Code).

This Tax Transparency disclosure has been prepared to meet the requirements of the Code, namely details of: Macquarie's tax policy, strategy and governance; Macquarie's operations; and details of Macquarie's effective tax rate, taxes paid and international related party dealings.

Tax policy, strategy and governance

Macquarie's tax governance framework is documented in Macquarie's Vision for Tax which is tabled at the Board Audit Committee (BAC). The BAC also requires tax reports to be prepared and presented regularly. The CFO, with the assistance of the Head of Tax, reports on general tax items and tax risk issues.

The principles of the Vision for Tax are consistent with Macquarie's approach to corporate governance and ensure that Macquarie:

- Maintains the highest of reputations and the confidence of all stakeholders, including clients, shareholders, regulators and investors;
- Complies with all tax laws and regulations;
- Conducts tax affairs in a manner that is consistent with the spirit of the law;
- Maintains documented policies and procedures in relation to tax risk management;
- Maintains an open, transparent and professional relationship with Revenue Authorities, both local and international; and
- Resolves any outstanding disagreements with Revenue Authorities.

Macquarie has entered into an Annual Compliance Arrangement (ACA) in relation to income tax and goods and services tax with the Australian Taxation Office (ATO). The ACA further enhances Macquarie's positive and proactive relationship with the ATO.

Macquarie has no appetite for any transaction that has, as its principal function, the avoidance of tax. Macquarie's tax governance framework is regularly reviewed.

Macquarie Operations

The distribution of taxes paid by Macquarie reflects the geographic spread of Macquarie's business. In operating its business globally, Macquarie comprises subsidiaries resident in many countries.

The location of the subsidiaries reflects commercial considerations, driven by the locations of our operations and the needs of our global clients. Each of these subsidiaries is subject to the taxation laws of the countries in which they are resident and also the overlay of Australia's comprehensive international taxation regime.

Effective tax rates

An effective tax rate (ETR) can be calculated as income tax expense divided by accounting profit.

Global Operations

The FY17 ETR[1] is 28.0%. Macquarie's ETR is largely driven by the geographical mix of income derived in any particular period. Around 63% of Macquarie's income during FY17 was earned by businesses outside Australia.

The amount of income tax paid will vary from the income tax expense used in calculating Macquarie's ETR in any given period, largely because of the impact of differences between when an amount of revenue or expense is recognised for accounting purposes and when income and deductions are recognised under the tax laws in the various jurisdictions in which Macquarie operates.

The following table provides a reconciliation on a global basis of operating profit to income tax expense, and from income tax expense to income tax paid, in accordance with the Code.

[1] Calculation of ETR is before adjusting for the impact of non-controlling interests.

Tax Transparency

Reconciliation of operating profit to income tax expense	March 2017 $m
Operating profit	3,104
Prima facie tax @ 30%	(931)
Permanent differences:	
Rate differential on offshore income	75
Other items	(12)
Total tax expense	**(868)**

Reconciliation of income tax expense to cash taxes paid	March 2017 $m
Total tax expense	(868)
Movement in current tax payable	(257)
Movement in tax receivables	5
Other balance sheet movements	15
Temporary differences:	
Fixed assets	9
Intangible assets	(9)
Investments	89
Tax losses	77
Leasing and financial instruments	207
Other assets and liabilities	9
Total Corporate Income Tax cash paid	**(723)**

Australian Operations

The FY17 ETR for the Australian operations is 32.1%. This is calculated as total tax expense divided by the accounting profit attributable to Macquarie's Australian operations and is based on the financial information used to produce Macquarie's financial statements.

Tax contribution statement

This table shows the total of corporate and other taxes paid in Australia and New Zealand (ANZ) and offshore.

Corporate and other taxes paid

	Corporate taxes		Employer taxes		Unrecovered GST / VAT		Total	
	FY17	FY16	FY17	FY16	FY17	FY16	FY17	FY16
ANZ	367	164	76	73	26	22	469	259
Offshore	356	1,014	126	123	18	17	500	1,154
Total	**723**	**1,178**	**202**	**196**	**44**	**39**	**969**	**1,413**

Note: All amounts are AUDm

During FY17, Macquarie also collected a range of taxes on behalf of governments in the countries where we operated. These included employee taxes of $1,030m (FY16 $1,121m) and indirect taxes (primarily GST and VAT) of $6,852m (FY16 $5,699m).

Tax Transparency

International related party dealings

As an Australian headquartered global integrated business, the Australian operations have significant dealings including through foreign branches with offshore related parties that impact the taxable position of the Macquarie Group Limited (MGL) Australian Tax Consolidated Group (TCG).

Related party dealings include dealings with entities resident in the United Kingdom, the United States, Hong Kong and Singapore.

Related party dealings giving rise to income and expenses in the MGL Australian TCG include:

- Derivative transactions as part of our global trading activities, including interest rate swaps and forwards;
- Financing and related activities, including amounts borrowed and loaned;
- Revenue and profit sharing arrangements for globally integrated businesses; and
- Service arrangements including the provision of software and information technology services, the provision of management and administrative services, together with asset management services.

Disclaimer

The material in this disclosure has been prepared by Macquarie Group Limited ACN 122 169 279 (Macquarie) and is general background information about Macquarie's activities current as at the date of this disclosure. This information is given in summary form and does not purport to be complete. Information in this disclosure should not be considered as advice or a recommendation to investors or potential investors in relation to holding, purchasing or selling securities or other financial products or instruments and does not take into account your particular investment objectives, financial situation or needs. Before acting on any information you should consider the appropriateness of the information having regard to these matters, any relevant offer document and in particular, you should seek independent financial advice. All securities and financial product or instrument transactions involve risks, which include (among others) the risk of adverse or unanticipated market, financial or political developments and, in international transactions, currency risk.

Unless otherwise specified all information is for the full year ended 31 March 2017. Certain financial information in this disclosure is prepared on a different basis to the Financial Report within the Macquarie Group Annual Report for the year ended 31 March 2017, which is prepared in accordance with Australian Accounting Standards.

This disclosure provides further detail in relation to key elements of Macquarie's financial performance and financial position. Any additional financial information in this disclosure, which is not included in the Financial Report, was not subject to independent audit or review by PricewaterhouseCoopers.