

| <b>Family Group Structure</b> |  |                 |
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| <b>Topic</b>                  | <b>Details</b>   | <b>Comments</b> |
| <b>Group Structure</b>        | <p>Provide a chart (or similar documents) showing the structure of the group (including companies, partnerships, trusts and superannuation funds) as at 30 June 2024.</p> <p>Advise of any changes to the structure during the review period (which is limited to FY24 for the purpose of this table) include all entities within Australia and foreign entities.</p> <p>(a) Have you carried out any significant or complex transactions (for example, share buybacks, rollovers, business exits or transitions of wealth between generations)?</p> <p>(b) Have you amended any trust deeds?</p> <p>(c) Have you amended any share or unit rights or issued any new classes of shares or units?</p> <p>(d) Does the trustee of any trust reclassify income or expenditure as on "revenue account" or on "capital account"?</p> <p>(e) Is there a consolidated group in the structure?</p> |                 |
| <b>Assets and businesses</b>  |  |                 |
| <b>Assets</b>                 | <p>Provide a summary of the group's assets and how those assets are funded. In particular, does the group hold any:</p> <p>(i) foreign assets, such as international property, bonds, foundations, credit contracts, companies, etc.</p> <p>(ii) luxury assets, such as boats, yachts, art, watches or cars.</p>   |                 |
| <b>Business</b>               | <p>Provide a summary of the group's businesses and how those business are funded. In particular:</p> <p>(i) the industry;</p> <p>(ii) turnover of the business, and whether it is operated through one or more entities (including any consolidated groups); and</p> <p>(iii) does the business have international operations or subsidiaries?</p> <p>(iv) is the business a "small business" under the tax law?</p>   |                 |

| <b>Tax reporting and history</b>                                    |   |  |
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| <b>Reporting</b>  | <p>(a) Are tax obligations up to date (Income tax, GST, superannuation, trustee-beneficiary statement lodgements, debts)?</p> <p>(b) Do you have executed copies of all trust deeds, variations and annual income resolutions? Are trust resolutions completed by 30 June each year?</p> <p>(c) Are the financial statements recorded and completed accurately by 30 June each year and consistently with the trust deed?</p> <p>(d) Are all ASIC records up to date and accurate (including "beneficial ownership requirements")?</p>  |  |
| <b>ATO compliance activity</b>                                      | <p>(a) Has the group previously been subject to ATO activity? For example, an audit or BAS review.</p> <p>(b) Has the group previously completed a voluntary disclosure to the ATO? For example, as part of Project DOIT or the Superannuation Amnesty.</p>   |  |
| <b>Alignment between accounting and tax results</b>                 |   |  |
| <b>Financial information, Tax reconciliation and working papers</b> | <p>For each entity in the private group, provide the following information:</p> <p>(a) Were there any revaluations or extraordinary items in any of the accounts?</p> <p>(b) Do you carry out adjustments (add-backs or subtractions) in the tax reconciliation to account for differences between tax and accounting principles, such as:</p> <ul style="list-style-type: none"> <li>(i) depreciation, including capital works and/or "black-hole" expenditure</li> <li>(ii) income for trust purposes</li> <li>(iii) bad debts</li> <li>(iv) exempt income, including non-taxable capital gains</li> <li>(v) tax losses</li> <li>(vi) immediate deductions for capital items.</li> </ul> <p>(c) the working papers which support the calculation of any CGT gain/loss (including the applicable CGT event, whether a roll-over has been chosen and details of any CGT discount/concessions that have been claimed).</p> |  |

| <b>Tax Governance</b>                                       |   |  |
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| <b>Tax governance framework</b>                             | <p>(a) The name of any entities (other than your accountant or tax agent) that provided you with tax advice and what advice that was in relation to.</p> <p>(b) What tax governance do you or your tax agent have in place for day-to-day tax issues and more significant tax events?</p> <p>(c) Have you obtained Reasonably Arguable Position advice for any tax positions that you have taken?</p> <p><i>In responding to questions like these, care must be taken to ensure that your client does not inadvertently waive legal privilege in respect of any legal advice that may have been provided to your client</i></p>   |  |
| <b>Significant transactions, acquisitions and disposals</b> |   |  |
| <b>Significant new businesses and transactions</b>          | <p>(a) During the review period, did you commence any significant new business or investment activities?</p> <p>(b) Did you undertake any significant new transactions that does not form part of your normal business activities?</p> <p>(c) If yes, to either question above, provide:</p> <p style="padding-left: 20px;">(i) an explanation of the other significant activities and transactions,</p> <p style="padding-left: 20px;">(ii) a brief description of how these were financed, and</p> <p style="padding-left: 20px;">(iii) how tax risks were identified and mitigated.</p>  |  |
| <b>Restructure - Acquisition</b>                            | <p>(a) Did you or any entity in the group acquire an interest in an entity (including a foreign entity) during the review period?</p> <p>If so, provide the following for each acquisition:</p> <p style="padding-left: 20px;">(i) details of any restructure that occurred within the group leading up to or at the time of the acquisition</p> <p style="padding-left: 20px;">(ii) acquisition price and the form of consideration provided</p> <p style="padding-left: 20px;">(iii) name of the purchaser within your group</p> <p style="padding-left: 20px;">(iv) date of acquisition</p> <p style="padding-left: 20px;">(v) an explanation of how the acquisition was financed (including the provider of the finance and whether it is a related party).</p> |  |

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| <b>Restructure - Disposal</b>                    | <p>(a) Did any entity in the group dispose of an interest in an entity or assets (including a foreign entity) during the review period?<br/>If so, provide the following for each disposal:</p> <ul style="list-style-type: none"> <li>(i) details of any restructure that occurred within the group leading up to or at the time of the disposal</li> <li>(ii) amount of consideration and the date it was received</li> <li>(iii) an explanation of how any deferred consideration (e.g. earn-out arrangement, if any) has been treated for income tax purposes</li> <li>(iv) were any tax concessions applied such as the Small Business Concessions, CGT discount or Pre-1985 exemptions?</li> </ul> |  |
| <b>Funding</b>                                   | <p>Provide an overview of the funding structure of the group during the review period, including:</p> <ul style="list-style-type: none"> <li>(a) composition of funding (debt / equity) including the entities involved and whether it is a related party or third party, including the location of lenders</li> <li>(b) purpose of funding (if it relates to a debt)</li> <li>(c) cost of funding (if it relates to a debt)</li> <li>(d) Is the group funded using a 'bucket company' with unpaid present entitlements, Pre-December 2009 loans, or other internally structured loans?</li> </ul>   |  |
| <b>Tax risks flagged by the ATO to taxpayers</b> |  |  |
| <b>International related party dealings</b>      | <p>During the review period, did any entity in the group have any arrangements with international related parties, including, for example, loan arrangements, royalty arrangements, distribution arrangements, management or other service arrangements, and derivative transactions?</p>  |  |
| <b>Interest / Royalty withholding tax (WHT)</b>  | <p>(a) In respect of any interest or royalty deducted in respect of an arrangement with a non-resident, advise if WHT has been remitted and paid to the ATO.<br/>If so, provide:</p>   |  |

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|   | <p>(i) a brief description of what the amount relates to</p> <p>(b) If no WHT was remitted and paid to the ATO in respect of interest or royalty during the review period, explain the basis as to why WHT was not applicable.</p>  |  |
| <b>Dividend withholding tax (WHT)</b>   | <p>(a) In respect of any dividends paid to a non-resident, advise if WHT has been remitted and paid to the ATO.</p> <p>If so, provide:</p> <p>(i) the amount was paid to and its country of residence</p> <p>(b) If no WHT was remitted and paid to the ATO, explain the basis as to why WHT was not applicable.</p>  |  |
| <b>Division 7A risks: loans and/or payments to a shareholders and/or associates</b> | <p>(a) During the review period, have any entities advanced a loan and/or made a payment to the shareholder(s) (or their associates) of any private company within your group?</p> <p>If so:</p> <p>(i) was the loan and/or payment not fully repaid before lodging the most recent tax return?</p> <p>(b) Are there existing shareholder loan accounts (including any loan accounts arising from an unpaid present entitlement)?</p> <p>(c) Did the group extinguish any unpaid present entitlement (UPEs) by implementing an arrangement where a private company has subscribed for, or was issued, units in a unit trust within the group?</p> |  |
| <b>Trust distributions</b>  | <p>(a) For the largest 5 unpaid present entitlements (UPE) of any private company as at 30 June 2024, provide an explanation as to how the UPE was treated for tax purposes. If the UPE has been placed in a sub-trust, provide a copy of the investment agreement entered into by the trust and the corporate beneficiary.</p> <p>(b) Where there has been significant deductions claimed against discretionary trust income during the review period. Provide a breakdown of the deductions and for each deduction item, a brief description of the</p>   |  |

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|   | <p>nexus between the discretionary trust income and the beneficiaries' expense.</p> <p>(c) If any entitlement to trust income was conferred to a non-resident beneficiary during the review period, provide an explanation as to how the trustee has satisfied, or proposes to satisfy, the entitlement. If the trustee stated that it had a nil liability under subsection 98(3) of the Income Tax Assessment Act 1936 in respect of net income referable to the non-resident beneficiary's entitlement, explain why this liability is nil.</p> <p>(d) If any entitlement to trust income was conferred to a tax-exempt entity during the review period, provide documents relating to the satisfaction of any of the entitlement or explain why the entitlement has not been satisfied.</p>   |  |
| <p><b>Tax deductions and tax losses</b></p> | <p>(a) Where an entity has been in a net loss position for several years, explain how you have funded the business and investment activities given its net loss position and when you expect these activities become profitable.</p> <p>(b) Where an entity has claimed significant 'all other expenses' in the income tax return for the income year ending 30 June 2024, indicate on the trial balance which expenses have been included in the all other expenses label. If an itemised description is included in the statement of comprehensive income with notes for the entity requested earlier, disregard.</p> <p>(c) In respect of losses (capital or revenue) utilised by an entity during the review period, explain what causes these losses. Provide the working papers and analysis performed which demonstrates that the continuity of ownership test or the same business test was satisfied.</p> <p>(d) In respect of losses (capital or revenue) utilised by an entity during the review period, explain what causes these losses. Provide the working</p> |  |

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|   | <p>papers and analysis performed which demonstrates that the relevant trust loss tests were satisfied.</p> <p>(e) How have excess FTC impacted losses?</p>   |  |
| <b>Research &amp; Development (R&amp;D) tax incentive</b> | <p>Did the group apply any R&amp;D tax concessions? If so, provide:</p> <ul style="list-style-type: none"> <li>a) the value of the R&amp;D concessions claimed by the group</li> <li>b) a description of how expenditure is distinguished and apportioned between eligible and non-eligible R&amp;D activities</li> <li>c) if any expenditure incurred to an associate, affiliate or connected entity, explain: <ul style="list-style-type: none"> <li>(i) what amount was paid to the associate and when?</li> <li>(ii) how was the work conducted by the associate?</li> <li>(iii) what was the source of funds for payment to the associate?</li> <li>(iv) if any R&amp;D results (for example, intellectual property, feedstock outputs) were disposed of, or payment received for the results of the R&amp;D, provide an explanation of the transactions</li> </ul> </li> </ul> |  |
| <b>Small business and CGT concessions</b>                 | <p>Have any of the entities in the group claimed any of the small business tax concessions? For example:</p> <ul style="list-style-type: none"> <li>(i) Capital gains tax concessions</li> <li>(ii) Lower corporate tax rate</li> <li>(iii) Simplified depreciation</li> </ul>   |  |
| <b>Self-managed superannuation fund (SMSF)</b>            | <p>(a) Did the SMSF receive any non-cash contributions from the members or their associates? If yes, provide an explanation of:</p> <ul style="list-style-type: none"> <li>(i) the nature and market value of the non-cash contributions</li> <li>(ii) how the contributions were treated for tax purposes by both the transferor and the SMSF.</li> </ul> <p>(b) Did the SMSF lend money or provide any financial assistance to a member of the fund or an associate of a member of the fund?</p> <p>(c) Did the SMSF derive any income or receive any distributions from a company and/or trust within your group? If yes, provide:</p>  |  |

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|  | <p>(i) an explanation as to whether any of the income or distribution is a non-arm's length income and thus subject to higher tax</p> <p>(ii) documents confirming whether the SMSF has a fixed entitlement to the income including when and how the fixed entitlement was acquired.</p> <p>(d) Did the SMSF enter into any transactions, such as investments, asset acquisitions or leasing arrangement with a related trust? If yes, provide an explanation of the nature of the transactions and any written agreements in relation to these transactions.</p>  |  |
| <b>Private Ancillary Fund (PAF)</b>        | Does the group include any charitable entities or entities which are endorsed as a deductible gift recipient?  |  |
| <b>Tax consolidation</b>                   | <p>Have entities in your group formed a tax consolidated group within the review period?</p> <p>Have any entities joined the consolidated group during the review period?</p>  |  |
| <b>Fringe Benefit Tax (FBT)</b>            | Do the tax records indicate that an entity has motor vehicles registered in its name in circumstances where it has not lodged a FBT return nor declared employee contributions in the tax return for the FBT review period?  |  |
| <b>Tax treatment of property disposals</b> | <p>Did an entity in the group report a disposal of any property as being on capital account during the review period?</p> <p>If yes, then for each disposal, explain:</p> <p>(a) Why the underlying property was not sold as part of a property development business</p> <p>(b) How the underlying property was treated for accounting purpose (e.g. non-current asset or trading stock)</p> <p>(c) The purpose of acquiring the underlying property</p> <p>(d) The details of any development activities that were undertaken in respect of the land (e.g. applying for the planning permits, subdivision, construction, etc.) prior to sale</p> <p>(e) How the acquisition and/or construction of the property was funded.</p> |  |



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| <p><b>Construction contracts</b></p>  | <p>(a) Provide a brief description of your tax policy in respect of recognising the long term contracts and in what situations the relevant entity is able to deviate from that policy.</p> <p>(b) For the largest current contract (in terms of revenue) that has been in operation over the review period, provide:</p> <ul style="list-style-type: none"> <li>(i) a brief description of your tax policy in respect of recognising long term contracts and in what situations the relevant entity can deviate from that policy,</li> <li>(ii) parties to the contract (specify if the contract is with a related or third party),</li> <li>(iii) an explanation of when revenue is recognised for both tax and accounting purposes, and</li> <li>(iv) a brief description of the book-to-tax adjustment to reflect the tax treatment.</li> </ul> |  |
| <p><b>Taxpayer alerts</b></p>         | <p>For the review period, explain whether you had an arrangement or a variation of an arrangement described by a Taxpayer Alert.</p>  |  |
| <p><b>Uncertain tax positions</b></p> | <p>Describe any arrangements that you have entered into where you have taken a position that is about as likely to be correct as incorrect or is less likely to be correct than incorrect in your income tax return in respect of which uncertainty about income taxes payable or recoverable is recognised and/or disclosed in your or a related party's financial statements.</p>   |  |
| <p><b>Rulings or advice</b></p>       | <p>Did you obtain a private ruling (or other advice) from the ATO during the last two years?</p>  |  |