

AustralianSuper's tax transparency report

Contribution to Australia's tax system
FY2019

Introduction

AustralianSuper invests over \$180 billion on behalf of more than 2 million Australians with the aim of helping them achieve their best possible retirement outcomes.

In doing this, AustralianSuper plays a significant and meaningful role in the Australian community and national economy.

For the 2019 financial year (FY2019), AustralianSuper paid over \$1 billion of income tax in Australia – which makes AustralianSuper one of Australia’s largest taxpayers.

AustralianSuper is pleased to publish this tax transparency report for its second year of adopting the federal government’s Voluntary Tax Transparency Code (the Code).

Whilst the specific requirements of the Code do not extend to include superannuation funds, AustralianSuper is pleased to support this initiative through its voluntary participation.

Australia’s tax regime for superannuation funds

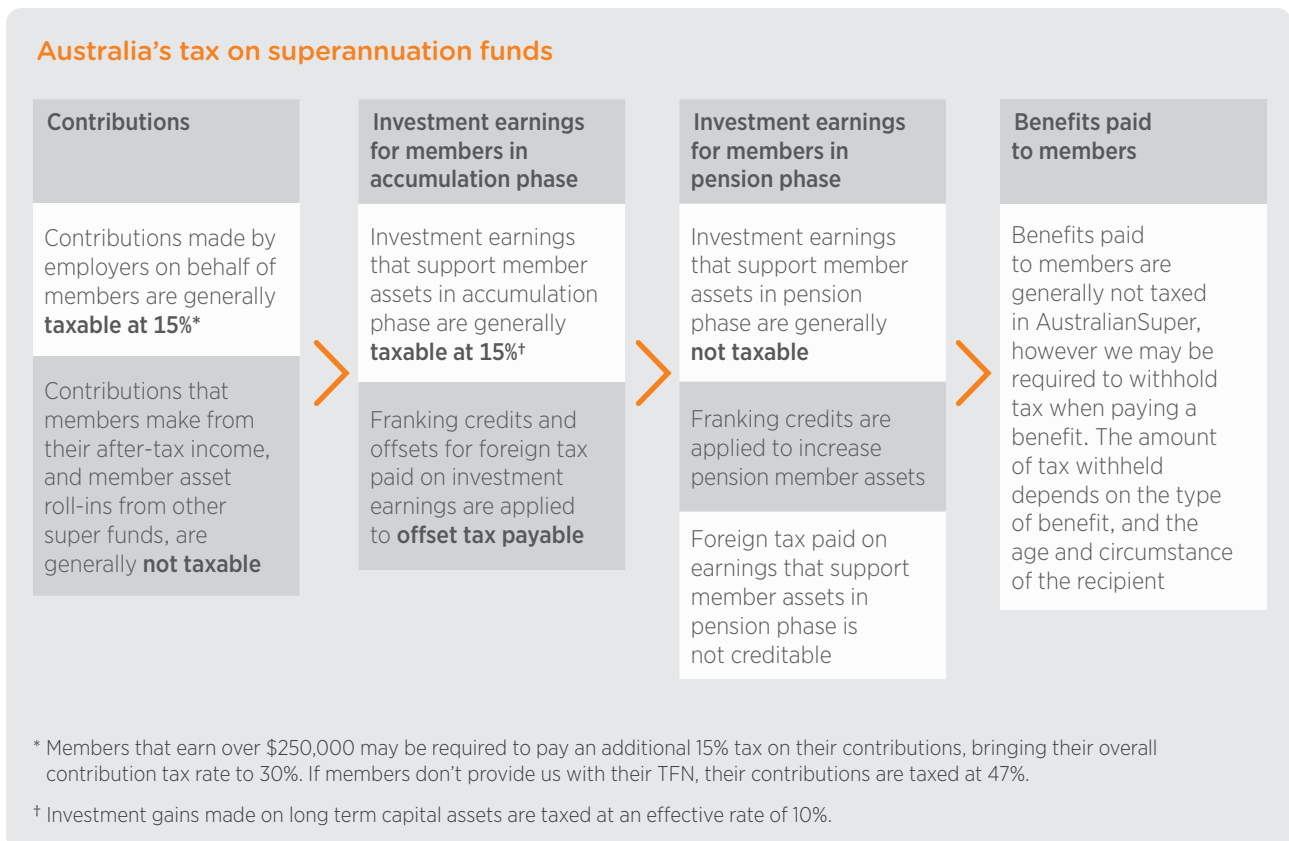
Superannuation is a long-term retirement savings system and a special tax regime applies to Australian superannuation funds including AustralianSuper.

The tax that Australian superannuation funds pay largely depends on the type of income generated and the retirement savings phase of members.

Like all superannuation funds, AustralianSuper is required to pay tax on:

- › contributions that we receive from or on behalf of members
- › investment earnings that we generate for some members
- › some benefits that we pay to members.

This has been summarised in the table below.



AustralianSuper's approach to tax risk management and governance

AustralianSuper's approach to tax risk management and governance aims to support AustralianSuper's objective of helping members achieve their best possible retirement outcomes.

To do this, AustralianSuper ensures the highest possible standards of integrity and transparency are applied to all our tax affairs, while adopting an approach that appropriately maximises after-tax returns for members.

The key purpose of our tax risk management and governance process is to ensure our tax affairs are managed so that we comply with all our tax obligations and pay the correct tax in all countries, ensuring we:

- › comply with both the letter and the spirit of the tax laws
- › maintain an open, honest and co-operative approach with all tax authorities
- › do not engage in aggressive tax planning practices
- › do not tolerate practices that rely on secrecy.

AustralianSuper's process ensures that its tax positions are reviewed with the aim of making sure that AustralianSuper does not take aggressive tax positions and that we always work with tax authorities as a responsible taxpayer to comply with all tax laws.

Our approach to tax risk management and governance is approved by AustralianSuper's Board, and is documented in our tax risk management and governance framework in accordance with ATO public guidance.

AustralianSuper's FY2019 tax payments

AustralianSuper pays a range of different taxes to the Australian state, territory and federal governments each year. The chart below summarises the taxes that AustralianSuper paid for FY2019, and also the factors that influence the amount of those taxes paid.

AustralianSuper has achieved the highest rating of 'Justified Trust' in the ATO's Top 100 Assurance Review Program.

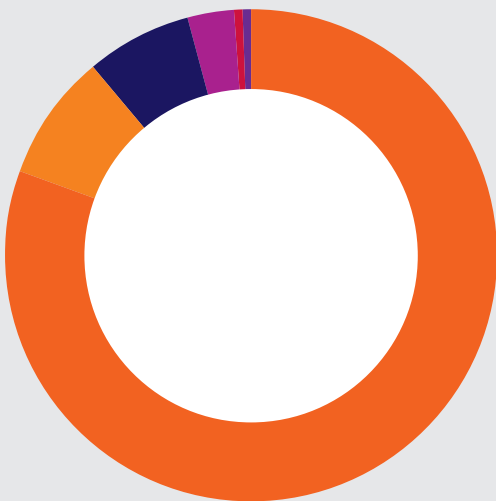
In AustralianSuper's Tax Assurance Report (issued by the ATO on 19 December 2019), the ATO stated:

"We obtained assurance that the Fund paid the right amount of Australian income tax for the income year reviewed."

In the same report the ATO also said:

"The Fund takes an open, transparent and cooperative approach to its tax obligations and proactively engages with the ATO team on a regular basis..."

AustralianSuper tax paid FY2019



Tax paid	\$(m)	Amount of tax paid is driven by:
Income tax	1,081	Contributions and investment returns
Direct foreign taxes	113	Foreign investment returns
Withholding tax (benefits)	91	Benefit payments to members (borne directly by members)
Withholding tax (salaries)	41	Employee salaries (borne directly by employees)
GST	7	Acquisition of goods and services
Employment taxes	7	Employee salaries and benefits
Total	1,340	

AustralianSuper's FY2019 income tax expense

Income tax expense is calculated using accounting principles and is included in our financial statements, published on our website. The accounting standards for superannuation funds require that income from investing activities be shown separately to member related activities. This is shown in the table below.

As a superannuation fund, our taxable income is taxed at 15%, however some income that is included as income for accounting purposes is not included in income for tax purposes. For example, investment earnings that support member assets in pension phase are exempt

from tax, and long term capital gains are allowed a one-third capital gains tax discount (an effective tax rate of 10%). Most transfers in from other superannuation funds are also not taxable.

The Australian tax law also allows tax offsets (for example, for foreign tax and franking credits that reflect that tax has already been paid) which apply to offset our tax payable.

This means that our income tax expense is lower than 15% of our accounting income. The table below reconciles the differences between our FY2019 accounting income (at 15%) to our income tax expense.

FY2019 reconciliation of accounting income to income tax expense (\$m)	Income statement	Change in members' benefits	Total
Accounting income	12,919	23,492	36,411
Prima facie income tax expense (at the superannuation tax rate of 15%)	1,938	3,524	5,462
Adjusted for tax effect of the following items:			
Non-taxable member contributions		-285	-285
Non-taxable transfers in from other superannuation funds		-1,934	-1,934
Tax deductible Group Life insurance premiums		-81	-81
Anti-detriment tax deduction on death benefits		-2	-2
Capital gains tax concession and tax exempt capital gains	-133		-133
Tax exempt income supporting pension balances	-224		-224
Franking credits and foreign tax offsets	-952		-952
Other	3		3
Over-provision for tax in the prior year	-11		-11
Income tax expense	621	1,222	1,843
Effective rate of income tax expense (after adjustment for amounts which are not deductible/not taxable)	4.8%	5.2%	5.1%

The actual income tax that AustralianSuper pays each year is different to the amount of income tax expense shown in AustralianSuper's financial statements each year.

This is largely due to the income tax expense including a provision for tax on items which are assessable or deductible for tax purposes in a different year. For example, unrealised market value movements on investments are recognised for accounting income each year, but are only taken into account for tax purposes when we sell those investments.

The below table shows the difference between the amount of income tax expense in our financial statements, compared to the income tax that we paid for FY2019.

FY2019 reconciliation of income tax expense to income tax paid (\$m)	Income statement	Change in members' benefits	Total
Income tax expense	621	1,222	1,843
Under-provision for tax in the current year*	13		13
Net unrealised investment gains	-792		-792
Accrued income and expenses	6		6
Impact of over-provision for tax in the prior year	11		11
Income tax paid for 2019	-141	1,222	1,081

* Largely relates to trust distribution income where the tax components were provided to us after completion of the financial statements.

AustralianSuper's trustee

AustralianSuper Pty Ltd is the corporate trustee of AustralianSuper (the fund). As trustee, AustralianSuper Pty Ltd provides trustee services to AustralianSuper and in doing so incurs operating costs in fulfilling its trustee obligations. AustralianSuper Pty Ltd recovers those operating costs through charging a trustee services fee to AustralianSuper.

The financial result of AustralianSuper Pty Ltd can be impacted by timing differences in charging the trustee fee. In FY2019, AustralianSuper Pty Ltd's trustee fee income was \$486 million, and its operating costs were \$486 million (resulting in a net accounting income for FY2019 of nil). AustralianSuper Pty Ltd was however required to make payments of tax to the ATO of \$111,000 for FY2019.

AustralianSuper's global investments

AustralianSuper invests globally to diversify investments across a broad range of assets, which helps achieve the best possible returns for members. We pay tax in accordance with the tax rates and tax laws in the foreign countries in which we hold investments.

Our global investments include interests in listed equities, cash and fixed interest securities. Our scale and reputation also allows us to invest in unlisted assets such as property, infrastructure and private equities.

In order to access global unlisted assets which provide diversification benefits, investment scale, desired commercial outcomes and co-investment with other global institutional investors, AustralianSuper invests into pooled entities. This enables AustralianSuper to access investments that might otherwise not be available if investing alone.

Some of AustralianSuper's global pooled entities are located in low or no tax countries. There are a variety of commercial and legal reasons for this and from a tax perspective these pooling locations generally mean that the co-investors don't unnecessarily pay tax twice on the same income.

For AustralianSuper, this means that tax is paid where the global investments are located, and in Australia where all of our income is returned and is subject to tax appropriately with offsets for eligible foreign tax paid.

Consistent with our approach to Australian investment, when investing globally, we apply the same approach to tax governance regarding compliance with both Australian and international tax laws.

As a global investor, AustralianSuper indirectly pays foreign tax on income earned by the foreign companies that it invests in. AustralianSuper also directly pays foreign tax, predominantly on interest and dividend income earned from its foreign investments. A summary of the direct foreign tax paid by AustralianSuper for FY2019 appears in the table below.

Region	\$ (m)
North America	47
Europe	33
Asia	18
South America	1
Africa	1
Other*	13
Total	113

* Relates to receipts from external trust distributions.

In addition to our seven office locations in Australia, AustralianSuper also has offices in London, New York and Beijing which operate to help support AustralianSuper's global investment activities. Investment support activities that are performed for the Fund by our international offices are provided in accordance with the requirements of the tax laws and tax authorities of both Australia and those foreign countries.

Contact us

Call **1300 300 273**
(8am to 8pm AEST/AEDT weekdays)

Email australiansuper.com/email

Web australiansuper.com

Mail GPO Box 1901, MELBOURNE VIC 3001

This information is of a general nature and does not take into account your personal objectives, situation or needs. Before making a decision about AustralianSuper, consider your financial requirements and refer to the Product Disclosure Statement (PDS). AustralianSuper Pty Ltd ABN 94 006 457 987 AFSL 233788. Trustee of AustralianSuper ABN 65 714 394 898.

20905 02/20