

BOQ TAX REPORT 2019

Year Ended 31 August 2019

BOQ TAX REPORT

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CHIEF FINANCIAL OFFICER'S INTRODUCTION

I am pleased to present the Bank of Queensland Limited (BOQ or BOQ Group) Tax Report for the year ended 31 August 2019. This Tax Report is published on a voluntary basis and meets the requirements set out in the Australian Board of Taxation's Voluntary Tax Transparency Code.

BOQ is a supporter of tax transparency, and prides itself on having open and honest relationships with the tax regulators in all jurisdictions in which it operates. BOQ takes its tax compliance responsibilities seriously and has policies and procedures in place to ensure that all tax obligations are satisfied in a lawful manner.

BOQ makes a wide range of tax-related payments to tax authorities in Australia and New Zealand (NZ). In addition to income tax, BOQ is also subject to fringe benefits tax (FBT), goods and services tax (GST) and payroll tax. BOQ also collects and pays 'pay as you go' (PAYG) taxes on behalf of its employees. Stamp duty and withholding taxes are also collected and paid on behalf of customers and investors.

In the 2019 financial year, BOQ paid \$169 million in taxes and collected \$242 million in taxes (refer to Page 6 for composition). BOQ's tax expense for accounting purposes of \$137 million represents an effective tax rate of 31.5%.

Consistent with prior years, the BOQ effective tax rate remains above the corporate tax rate of 30% largely as a result of capital note distributions, which are treated as non-deductible distributions for tax purposes.

As a financial institution, a number of BOQ's products are classified as input taxed supplies (e.g. deposit accounts and loans) for GST purposes. As a result, GST is not included in amounts charged to customers (e.g. fees and interest) and BOQ is unable to recover input tax credits for the GST included in the price of purchases related to making these input taxed supplies. BOQ also makes supplies that are taxable (subject to GST). BOQ can recover the full amount of GST incurred on inputs related to taxable supplies. As a result of the mix of BOQ's business operations, GST is ordinarily a cost borne by BOQ. In 2019, BOQ incurred \$24 million of GST that it was unable to recover.

In addition, for the personal income tax year ended 30 June 2019, \$74 million of PAYG withholding taxes were remitted to the Australian Taxation Office (ATO) on behalf of BOQ employees.

This report provides the following information in relation to BOQ:

- Overview of BOQ Group;
- Tax strategy and governance;
- Income taxes disclosed in BOQ's 2019 Annual Report;
- ATO tax transparency disclosure; and
- Taxes paid and collected.

The information in this report is in addition to information published in the BOQ 2019 Annual Report which was prepared in accordance with Australian Accounting Standards and complies with the International Financial Reporting Standards.



Ewen Stafford
Chief Financial Officer and Chief Operating Officer
7 April 2020

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OVERVIEW OF BOQ GROUP

BOQ is a full service financial institution, listed on the Australian Securities Exchange (ASX), regulated by the Australian Prudential Regulation Authority (APRA) as an authorised deposit-taking institution. BOQ has grown from being the first Permanent Building Society in Queensland in 1874 to the current day network of retail branches and other points of presence spanning every state and territory in Australia.

BOQ's main operations include – as a retail and business bank – taking deposits from customers, and providing loan facilities to borrowers, as well as the provision of equipment finance and insurance. The majority of BOQ's profits are earned within Australia. BOQ also earns profits in NZ although the contributions are not material. BOQ books profits and pays tax in the jurisdiction where the service is provided to the customer. BOQ does not provide any services to customers or have profits in any jurisdictions outside of Australia and NZ.

For Australian tax purposes, BOQ has elected to form an income tax consolidated group (the BOQ Tax Consolidated Group). The BOQ Tax Consolidated Group is made up of Bank of Queensland Limited (as the Head Company of the BOQ Tax Consolidated Group) and its wholly owned Australian subsidiaries. For income tax purposes, the members of the BOQ Tax Consolidated Group are treated as if they were a 'single taxpayer'.

BOQ generates franking credits in Australia in respect of income tax paid by the BOQ Group. These franking credits are passed on to shareholders in the form of franked dividends. Historically, dividends on ordinary shares and distributions on capital notes paid by BOQ have been fully franked.

BOQ employs over two thousand people in Australia and manages the employment related taxes in respect of these employees.

As at 31 August 2019 BOQ had two NZ subsidiary companies (one of which is dormant) and one NZ branch. These NZ entities are subject to the NZ tax regime. Profits of the NZ entities are taxed at the NZ corporate tax rate of 28% (as compared to the Australian corporate tax rate of 30%). BOQ has minor cross border charges related to management services and interest that are immaterial to BOQ's operations. From FY17, Country-by-Country (CbC) reporting applied to the BOQ Group.

TAX STRATEGY AND GOVERNANCE

BOQ's tax strategy is focused on integrity, compliance, certainty and maximising shareholder value.

This strategy is implemented through BOQ's Tax Risk Management Policy (TRM Policy). The TRM Policy is approved by the Board of Directors and is subject to annual review. The TRM Policy outlines the following governance parameters that are to be followed at all times:

- The commercial, social and customer-focused objectives of the BOQ Group are of the highest priority, and all tax planning and advice is to be undertaken in this context and with regard to these goals;
- The BOQ Group is committed to being a responsible corporate taxpayer in complying with all laws in respect of taxation applicable to the BOQ Group's business operations;
- The integrity of the BOQ Group, and both the financial and non-financial impacts of decisions are to be considered when assessing tax positions and strategies;
- The BOQ Group has an obligation to pay the legally correct amount of taxes due, as established by the laws in the jurisdictions in which it operates. This includes an obligation to lodge returns and pay taxes on time;
- The BOQ Group seeks to achieve certainty relating to all tax positions adopted, however acknowledges that this may not always be possible. All tax positions adopted by the BOQ Group are to be no less than "reasonably arguable". However, it is the preference of the Board that significant tax positions adopted generally carry a higher level of certainty than "reasonably arguable", and the usual standard to be applied would be that the tax position has a high degree of probability of withstanding challenge; and
- The BOQ Group will not enter into artificial or contrived arrangements to achieve a tax benefit.

In accordance with the TRM Policy, BOQ undertakes regular reviews and testing of tax governance and controls, consistent with the broader BOQ Group operational risk framework.

BOQ has developed an open, honest and professional relationship with the ATO. This has been achieved by proactively engaging the ATO to discuss key tax issues and seeking private binding rulings on material tax issues that are considered uncertain. As the BOQ Group is a large taxpayer, the ATO has undertaken various tax risk and assurance reviews including a Streamlined Assurance Review. BOQ has approached these reviews in an open, cooperative and professional manner.

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INCOME TAXES DISCLOSED IN BOQ'S 2019 ANNUAL REPORT

BOQ reported income tax expense of \$137 million in the 2019 financial year. BOQ's effective tax rate of 31.5% for the 2019 financial year has been calculated by dividing BOQ's income

tax expense by the statutory accounting profit before income tax. The primary drivers of BOQ's income tax expense and effective tax rate are as follows:

Reconciliation of statutory accounting profit to Income tax expense	%	\$m
Profit before income tax		435.0
Tax using BOQ's statutory tax rate ¹	30.0	130.5
Capital note distributions ²	1.4	6.0
Amortisation – Customer related intangibles and brands ³	0.2	0.8
Other items	(0.1)	(0.3)
Total income tax expense	31.5	137.0

Income tax expense is an accounting concept which represents the amount of income tax accrued for accounting purposes. Income tax expense includes both current and deferred tax (i.e. tax that will be paid / received in a later income year). As a result, there will usually be differences between the income

tax expense and the amount of tax paid for the period to the relevant tax authorities.

The primary differences between BOQ's income tax expense and the amount of income tax paid by BOQ for the 2019 financial year are as follows:

Reconciliation of Income tax expense to Income tax paid	\$m
Income tax expense	137
Leasing adjustment ⁴	(3)
Movement in provisions for impairment	6
Movement in accruals and other provisions	(10)
Income tax paid	130

Notes

Note 1 – Australian statutory tax rate is 30%.

Note 2 – Capital Notes are treated as equity instruments for tax purposes. As a result, distributions are not deductible.

Note 3 – Accounting amortisation of customer related intangibles and brands are not deductible.

Note 4 – The leasing adjustment relates predominately to differences between the tax and accounting treatment of finance leases. For tax purposes, BOQ is required to treat all lease payments as assessable and is eligible to claim depreciation deductions in relation to the leased assets.

ATO TAX TRANSPARENCY DISCLOSURE

Each year the ATO publishes information about the tax affairs of of public companies with a total income of \$100 million or more.

As BOQ is one of those companies, the ATO is expected to publish the following information about BOQ for the year ended 31 August 2019 in December 2020.

BOQ Tax Consolidated Group	\$m
Total Income	2,190.1
Taxable Income	430.3
Tax Payable	128.2

Tax payable disclosed by the ATO will be equal to the Australian corporate income tax paid by the BOQ Group.

This differs from the total income tax amount in the BOQ Annual Report as a result of corporate income tax paid in NZ.

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TAXES PAID AND COLLECTED

The tables below illustrate the types of taxes paid and collected by the BOQ Group in the 2019 financial year to the

Australian (Federal and State) and NZ tax authorities. The majority of BOQ's operations are in Australia.

Taxes paid by the BOQ Group

Tax Authority	Corporate income tax ¹	Employer / payroll taxes ²	Indirect taxes net of recoveries ³	Total taxes paid
	\$m	\$m	\$m	\$m
Australia (Federal)	128	1	24	153
Australia (State)	-	14	-	14
NZ ⁴	2	-	-	2
Total	130	15	24	169

Taxes collected by the BOQ Group

Tax Authority	Employee taxes remitted ⁵	GST collected ⁶	Withholding taxes ⁷	Total taxes collected
	\$m	\$m	\$m	\$m
Australia	74	155	4	233
NZ ⁴	-	9	-	9
Total	74	164	4	242

Notes

Note 1 – Corporate income tax relates to the year ended 31 August 2019, the relevant return period for the BOQ Group income tax returns in both Australia and New Zealand.

Note 2 – Consists of payroll and FBT taxes paid resulting from BOQ's role as an employer. Figures represent payroll tax for the 30 June 2019 year and FBT for the 31 March 2019 year which are the relevant annual return periods for those taxes.

Note 3 – Consists of GST which cannot be recovered from the ATO.

Note 4 – NZ taxes paid have been presented in Australian dollars using the conversion rate at 31 August 2019. Where NZ taxes paid are below \$500,000, the amount has been rounded down to nil.

Note 5 – Consists of PAYG withholding taxes collected on behalf of employees and paid by BOQ for the 30 June 2019 year which is the relevant annual return period for PAYG.

Note 6 – Consists of GST paid by BOQ Group customers and remitted to the relevant Tax Authority as GST payable.

Note 7 - Predominately consists of amounts withheld from customers where they have not quoted a tax file number (TFN) or Australian business number (ABN) or informed the BOQ Group that they are exempt from quoting either a TFN or ABN.

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Independent Auditor's Review Report

To the Directors of Bank of Queensland Limited

Conclusion

We have reviewed the tables presented in sections *Income Taxes Disclosed in BOQ's 2019 Annual Report* and *ATO Tax Transparency Disclosure* (page 5) and *Taxes Paid and Collected* (page 6) (the Tables) of Bank of Queensland Limited's (BOQ) Tax Report for the year ended 31 August 2019 (the BOQ Tax Report).

Based on our review, which is not an audit, nothing has come to our attention that causes us to believe that the Tables of the BOQ Tax Report do not present fairly, in all material respects, in accordance with the basis of preparation set out in the notes to sections *Income Taxes Disclosed in BOQ's 2019 Annual Report* and *Taxes Paid and Collected* (page 6).

Emphasis of matter – basis of preparation and matters relating to the electronic publication of the reviewed BOQ Tax Report

We draw attention to the notes to the Tables described in sections *Income Taxes Disclosed in BOQ's 2019 Annual Report* and *Taxes Paid and Collected* (page 6) of the BOQ Tax Report, which describes the Basis of Report Preparation. The BOQ Tax Report has been prepared to assist the Directors of BOQ in meeting the reporting principles of the Voluntary Tax Transparency Code (TTC). As a result, the BOQ Tax Report and this Auditor's Report may not be suitable for another purpose. Our conclusion is not modified in respect of this matter.

Our report is intended solely for the Directors of BOQ and should not be distributed to or used by parties other than the Directors of BOQ. We disclaim any assumption of responsibility for any reliance on this report, or on the BOQ Tax Report to which it relates, to any person other than the Directors of BOQ or for any purpose other than that for which it was prepared.

This review conclusion relates to the Tables of the BOQ Tax Report included on BOQ's website. The Company's directors are responsible for the integrity of BOQ's website. We have not been engaged to report on the integrity of BOQ's website. The review conclusion refers only to the subject matter described above. It does not provide a conclusion on any other information which may have been hyperlinked to/from these statements. If users of the BOQ Tax Report are concerned with the inherent risks arising from publication on a website, they are advised to refer to the hard copy of the reviewed BOQ Tax Report to confirm the information contained in this website version of the BOQ Tax Report. Our conclusion is not modified in respect of this matter.

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Management's responsibility for the BOQ Tax Report

The Directors and Management of BOQ are responsible for the preparation of the Tables in accordance with the notes to the Tables described in sections *Income Taxes Disclosed in BOQ's 2019 Annual Report* and *Taxes Paid and Collected* (page 6) of the BOQ Tax Report. This responsibility includes establishing and maintaining internal control relevant to the preparation of the Tables that is free from material misstatement whether due to fraud or error.

Auditor's responsibility for the review of the BOQ Tax Report

Our responsibility is to express a conclusion on the Tables presented in the BOQ Tax Report in order to state whether, on the basis of the procedures described, we have become aware of anything that has come to our attention that causes us to believe that the BOQ Tax Report does not present fairly, in all material respects in accordance with the basis of preparation set out in the notes.

We conducted our review in accordance with *Standard on Review Engagements ASRE 2405 Review of Historical Information Other than a Financial Report* and other auditing standards applicable to a review engagement. A review of the BOQ Tax Report consists of making enquiries, primarily of the persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with *Australian Auditing Standards* and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

ASRE 2405 requires us to comply with the independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Accounting Professional and Ethical Standards Board.

A handwritten signature of the KPMG firm, written in blue ink, appearing as 'KPMG' in a cursive, stylized font.

KPMG

Brisbane

7 April 2020

