

## Transfer pricing questionnaire: Foreign-owned multinationals

Answer the following questions based on the latest completed tax year. You may provide separate written comments if you wish to give clarification on any issue or identify assumptions made. Consolidated group information (Questions 12-19 below) can be in the currency of the ultimate parent company. All other values must be in NZ dollars.

1	Name of the company			
2	IRD number	(8 digit numbers start in the second box. 1 2 3 4 5	678)	
3	Address	Street address Town or city	Country	Postcode
4	Contact name			
5	Telephone number	( )		
6	Email			
7	Tax representative			
8	Ultimate parent company			
9	Tax residence of ultimate parent company			
10	Describe the principal activities of the company.			
11	Describe the principal activities of the ultimate parent company and its consolidated group.			

The following information is required for calculating various accounting ratios for comparison purposes. If your company is performing below consolidated group levels, you may wish to provide an explanatory note.

	This company NZ \$000	Consolidated group Currency
12 Shareholder funds (net assets)	\$	
13 Total assets	\$	
14 Total revenue (excluding interest)	\$	
15 Gross profit	\$	
16 Total expenses (excluding interest and expenses taken into account in calculating gross profit)	\$	
17 Earnings before interest, tax and exceptional items	\$	
<b>18</b> Gross interest expense	\$	
<b>19</b> Gross interest income	\$	

The following questions relate to supplies by or to the company by non-resident associated persons. In all cases include only cross-border transactions.

Property	Supplied by associated persons	Supplied to associated persons
	NZ\$000	NZ\$000
20 Raw materials	\$	\$
21 Processed goods	\$	\$
22 Other (specify)	\$	\$
23 Rents, royalties, licence or franchise fees	\$	\$
24 Intangible property (acquired or disposed of)	\$	\$
Services	Supplied by associated persons NZ\$000	Supplied to associated persons NZ\$000
25 Management and administration	\$	\$
26 Technical	\$	\$
27 Research and development	\$	\$
28 Commissions	\$	\$
Financial	Supplied by associated persons NZ\$000	Supplied to associated persons NZ\$000
29 Interest	\$	\$
30 Dividends	\$	\$
31 Insurance	\$	\$
32 Guarantees	\$	\$
33 Other (specify)	\$	\$
Other transactions	Supplied by associated persons NZ\$000	Supplied to associated persons NZ\$000
34 Reimbursement of expenses	\$	\$
35 Cost sharing/contribution arrangements	\$	\$
36 Revenue sharing arrangements	\$	\$
<b>37</b> Other (specify)	\$	\$
38 Total associated party transactions	\$	\$

New Zealand tax legislation sets out five methods (fields **39** to **43** below) to calculate an arm's length consideration for setting transfer pricing. In the "Supplied" columns below, record the value of transactions where prices have been confirmed by a method (the "tested transactions"). Where more than one method was used, allocate the value to the predominant method.

Field 44 is for the value of untested transactions. The totals at field 45 must equal the totals at field 38.

Transactions		Supplied by associated persons NZ\$000	Supplied to associated persons NZ\$000			
39	Comparable uncontrolled price method	\$	\$			
40	Resale price method	\$	\$			
41	Cost plus method	\$	\$			
42	Transactional profit split method	\$	\$			
43	Transactional net margin method	\$	\$			
44	Untested transactions	\$	\$			
45	Total transactions	\$	\$			
46	Has the company provided any goods or services or anything else of value to a non-resident associated Yes No person for no consideration? If the answer is "Yes" provide details.					
47	What is the value of transactions with associated persons tax resident in jurisdictions or territories where the income of the associated person would be taxed at a rate of <b>NZ\$000</b> 15% or less for a company having the usual tax status of a company?					
48	Have there been any material structural changes in the last five years which have resulted in a reduction of business functions, assets held and risks borne by the New Zealand operations? If so, provide details.					
49	If the company has entered into a partnership, joint venture or profit or revenue sharing arrangement with a non-resident associated person, provide details.					
50		ealand which, together with this company, form a grou elow or on a separate schedule and state whether the				
51	How many full-time equivalent staff does this	How many full-time equivalent staff does this company employ?				
52	How many staff earn more than NZ\$180,000 pa (excluding benefits)?					
53	What is the debt percentage of the New Zealand group as calculated under subpart FE of the Income Tax Act 2007? %					
54	Do you have documentation to support your transfer prices in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administration 2022? The guidelines are at www.oecd.org/tax/transfer-pricing					
55	Have any associated party transactions been the subject of a tax ruling or an advance pricing agreement in another jurisdiction? Yes No					
56	Are any associated party transactions the subject of an advance pricing agreement in New Zealand? Yes No					
57	Name of officer providing this information					
58	Position					