

**ECONOMICS REFERENCES COMMITTEE**  
**CORPORATE TAX AVOIDANCE AND MINIMISATION INQUIRY**  
**WOODSIDE RESPONSE TO WRITTEN QUESTIONS ON NOTICE**  
**FOLLOWING APPEARANCE ON 28 APRIL 2017**

***Related party financing arrangements***

**Q.1: Has your company had any discussions with the Australian Taxation Office (ATO) regarding related party financing arrangements?**

A.1: Woodside is voluntarily subject to an Annual Compliance Arrangement (ACA) with the ATO. Under this ACA related party financing arrangements are amongst a number of matters and transactions that are disclosed to the ATO. In addition, related party financing forms part of the disclosures in Woodside's income tax return filings.

The ATO has not sought information in relation to any related party financing arrangements, either formally or by discussion, over and above that already disclosed to them under Woodside's ACA and income tax return filings.

**Q.2: Is your company in agreement with the ATO regarding the pricing of related party loans and other related party financing arrangements?**

A.2: The ATO has not raised any concerns regarding Woodside's related party financing arrangements.

**• If your company is not in agreement, what is the difference between your company's assessment and the ATO's assessment of the value of tax in dispute?**

Not applicable.

**Q.3: The ATO's written submission to this inquiry (submission 139) notes the importance of related party financing to the oil and gas industry. On page 19, paragraph 76, the ATO notes that it has issued amended assessments to some taxpayers, and is having settlement discussion with others.**

**Has your company received an amended assessment from the ATO, or is your company involved in settlement discussions with the ATO, as a result of their compliance activity in respect of related party financing?**

A.3: No.

***Thin capitalisation***

**Q.4: Has your company had any discussions with the ATO regarding thin capitalisation limits?**

A.4: The ATO has not sought information in relation to thin capitalisation limits, either formally or by discussion, over and above that already disclosed to them under Woodside's ACA and income tax return filings.

**Q.5: Is your company in agreement with the ATO regarding thin capitalisation limits?**

A.5: The ATO has not raised any concerns regarding Woodside's thin capitalisation limits.

**• If your company is not in agreement, what is the difference between your company's assessment and the ATO's assessment of the value of tax in dispute?**

Not applicable.