



2019 **Tax** Transparency **Report**

QBE INSURANCE GROUP LIMITED

About QBE Insurance Group

QBE is one of the world's largest insurance and reinsurance companies, with operations in all the major insurance markets. Formed in Australia in 1886, QBE employs more than 11,700 people and carries on insurance activities in 27 countries, with operations in Australia, Europe, North America, Asia and the Pacific. QBE's captive reinsurers, Equator Re and QBE Blue Ocean, provide reinsurance protection to our divisions in conjunction with the Group's external reinsurance programs.

QBE is listed on the Australian Securities Exchange and is a for-profit entity.

All amounts in this report are in USD unless otherwise stated.

About this report

This report is prepared in accordance with the Australian voluntary Tax Transparency Code released by the Australian Treasurer on 3 May 2016 and UK tax authority guidance on publication of tax strategy by large businesses. QBE supports the principle behind multilateral moves towards greater transparency that increase understanding of tax systems and build public trust.

QBE strives to be a responsible corporate citizen and to make a positive contribution to the communities in which we operate. The taxes we pay and collect form a significant part of our economic contribution to the countries in which we operate. Our business activities generate a substantial amount and variety of taxes, including corporate income taxes, state income taxes, premium taxes, stamp duties, employment taxes and other taxes. In addition we collect and pay employee taxes as well as indirect taxes such as GST and VAT; however, these taxes are only included in the report where QBE is the ultimate payer of the tax and not simply acting as a collecting agent.

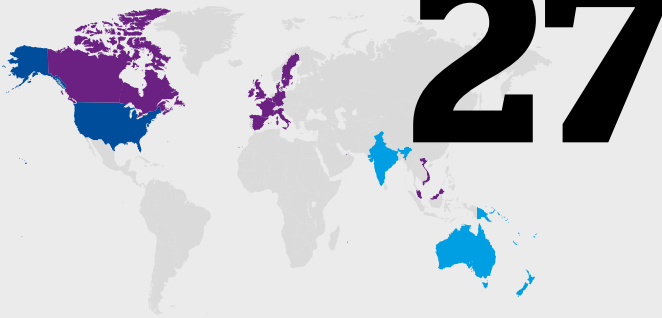
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2019 snapshot

Operational highlights

Countries of operation



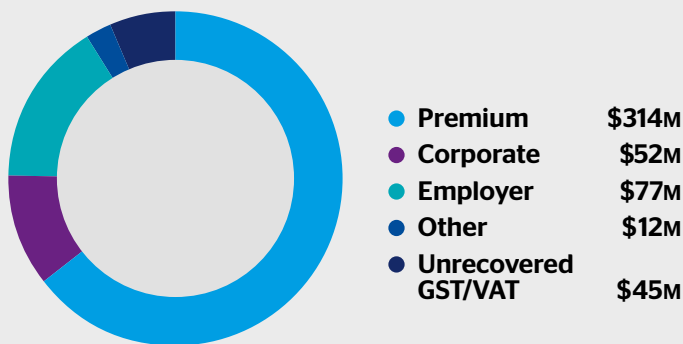
Overall workforce



11,704

Tax contribution highlights

Total tax contribution



Total taxes paid

\$500M

Australian taxes paid



\$86M

Group income tax expense

\$104M

Australian effective income tax rate

(Income tax expense divided by profit before income tax)

25%

1. Consolidated Group income tax reconciliation from 2019 Annual Report

Income tax expense is the accounting tax charge for the period and is calculated as the tax payable on the current period taxable income based on the applicable income tax rate for each jurisdiction, adjusted for changes in deferred tax assets and liabilities attributable to temporary differences and unused tax losses. The relationship between accounting profit and income tax expense is provided in the reconciliation of prima facie tax to income tax expense below. Income tax expense does not equate to the amount of tax actually paid to tax authorities around the world as it is based upon the accrual accounting concept.

Reconciliation of Consolidated Group prima facie tax to income tax expense for year ended 31 December 2019

	AUSTRALIA \$M	UNITED STATES \$M	UNITED KINGDOM \$M	REST OF THE WORLD \$M	TOTAL \$M
Gross written premium	3,515	4,637	3,465	1,825	13,442
Profit (loss) before income tax from continuing operations	386	(101)	166	221	672
Prima facie tax at 30%	116	(30)	50	66	202
Tax effect of non-temporary differences					
Untaxed dividends	(8)	–	–	–	(8)
Differences in tax rates	11	39	(19)	(44)	(13)
Other, including non-allowable expenses and non-taxable income	9	(2)	(2)	13	18
Prima facie tax adjusted for non-temporary differences	128	7	29	35	199
Deferred tax assets re-recognised	(10)	(53)	–	(1)	(64)
Overprovision in prior years	(20)	–	(6)	(5)	(31)
Income tax expense (credit)	98	(46)	23	29	104

A detailed reconciliation of the Group's accounting profit to income tax expense is provided in the tax note in our Annual Report.

A reconciliation of the Australian companies' taxable income to tax payable is included on page 8 of this report.

1.1 Effective tax rate

The effective tax rate is calculated as income tax expense divided by profit before income tax. The effective tax rate is calculated with reference to accounting income rather than taxable income, with the main differences being:

- certain foreign exchange gains and losses are accounted for in the foreign currency translation reserve on consolidation but are taxable in the local jurisdiction where the gains and losses arise;
- certain interest expense and financing costs were non-allowable for tax purposes due to restrictions that applied in the period;
- the amortisation expense for certain intangible items was treated as non-allowable; and
- changes in the recognition of deferred tax assets, particularly tax losses.

	AUSTRALIA	UNITED STATES	UNITED KINGDOM	REST OF THE WORLD	TOTAL
Effective tax rate	25%	46%	14%	13%	15%

The Group's effective tax rate in 2019 reflected the following:

- the mix of corporate tax rates in the countries where we operate;
- North America and Bermuda continuing to benefit from the utilisation of previously unrecognised tax losses; and
- a one-off \$45M recognition of North American deferred tax assets.

2. QBE tax strategy and governance



Compliance with tax legislation & regulations

We seek to comply with all applicable tax laws, regulations and disclosure requirements and to pay the amount of tax that is required to be paid in all of the jurisdictions in which we operate. Where compliance processes have been outsourced, we ensure that this principle is adhered to by the service provider.

All material positions taken in the tax compliance process must be supportable in terms of documentation and legal interpretation. Where a tax law or its interpretation is unclear, external advice may be sought in order to determine the appropriate tax treatment and, where practical, we will engage with tax authorities pro-actively to seek clarification.



Governance

The Board of QBE has oversight of global tax governance through the Group's tax risk framework, with local boards having oversight of divisional tax governance. Operationally, the Group CFO owns tax risk management and is responsible for ensuring the implementation of the Group's tax risk framework with assistance from the Group Head of Tax and divisional CFOs to ensure that policies and procedures that support the framework are in place, maintained and applied consistently around the world, and that the global tax teams have the skills and experience to implement the approach appropriately.

The global and divisional tax risk frameworks set out how we identify tax risk, how we seek to mitigate tax risk and the manner in which tax risk is escalated to the CFO and the Board.

Tax provisioning, including material positions taken, are subject to external audit review on a bi-annual basis. Wherever practical, we will not use our external auditor for tax advice in order to prevent potential conflicts of interest.



Tax risk management

We maintain a robust tax risk management framework as part of our internal control processes. The framework identifies, assesses and manages tax risks and accounts for these appropriately. The risks are divided into six categories as follows: compliance, financial reporting, strategic, operational, reputational and external risks.

The key operational principles covering these risks are: regular review of risk appetite; risk analysis; confirmation that tax risk data remains fit for purpose; and appropriate controls. These are regularly reviewed and updated as appropriate. In addition to this, our Internal Audit team provides independent assurance to the Board that the design and operation of the tax risk controls across the Group are effective.

We follow QBE's risk management framework as part of our internal control processes. We identify, assess and manage tax risks and account for them appropriately. We implement risk management measures including controls over compliance processes and monitor their effectiveness. We report on a periodic basis to the Group Board Audit Committee on how tax risks are managed, monitored and assured and on improvements that are being made. In this way the Board Audit Committee provides governance and oversight over tax risks.

2. QBE tax strategy and governance



Relationship with tax authorities

We seek to have open, honest and transparent relationships with tax authorities in all relevant jurisdictions.

We seek to build and sustain relationships with tax authorities that are constructive and based on mutual respect.

We work collaboratively wherever possible with tax authorities to achieve early agreement and certainty, and to resolve any disputes which may arise.

We engage appropriately on the development of tax laws, either directly or through trade associations and other similar bodies.



Attitude to tax planning

We engage in efficient tax planning that supports our business and reflects commercial and economic activity; no transaction will be entered into where obtaining a tax benefit is the primary purpose. We do not engage in artificial tax arrangements and we conduct transactions between Group companies on an arm's length basis in accordance with current OECD principles.

Tax incentives and exemptions are sometimes implemented by governments and fiscal authorities in order to support investment, employment and economic development. Where they may apply to QBE, we will seek to apply them in the manner intended.

We establish entities in jurisdictions suitable to hold our overseas investments, giving consideration to our business activities, the prevailing regulatory environment and, as appropriate, in line with joint venture requirements.



QBE attitude to risk

QBE is fully committed to ensuring that we apply a disciplined approach to risk management and that our risk management practices and systems are robust, independent and aligned with global best practice. QBE's Enterprise Risk Management (ERM) framework is outlined in QBE's Risk Management Strategy and is supported by frameworks for each risk class, including strategic risk, with tax risk being a subset of this risk class.

QBE's risk appetite forms the basis of the ERM framework and represents the level of risk that the Board and management are prepared to accept in pursuit of the organisation's objectives. QBE's tax risk appetite is included in the QBE Group risk appetite and is aligned to all strategic and business planning decisions QBE makes and we monitor our exposure against the risk appetite on an ongoing basis.

The QBE Group has adopted a Code of Ethics and Conduct that applies to all employees of the QBE Group worldwide. The Code of Ethics and Conduct builds on our company values and is an essential resource and guide for our people. It outlines a range of business ethics and standards of conduct and requires our employees to be respectful, professional, considerate and to maintain high ethical standards, uphold QBE's reputation and report unethical or illegal behaviour. The Code covers matters such as a commitment to compliance with laws and regulations, the giving and receiving of bribes and gifts, conflict of interests, use of company resources and external activities.

3. International related party dealings

QBE seeks to obtain synergistic benefits through collaboration across its international operations, the pooling of risks and resources and the leveraging of international centres of excellence. In determining the location for centralised operations, we consider a wide range of factors, including:

- stability and predictability of the political, regulatory and social environments;
- availability of relevant skills and the overall cost of operations; and
- connectivity with the Group's worldwide operations.

Our focus is on selecting locations that are commercially effective from an operational and strategic perspective. Whilst we take the local tax environment into account, we do not choose locations on the basis of tax incentives if that would lead to the location of activities in countries that may offer an attractive tax environment but would be impractical in other respects.

QBE seeks to ensure that transactions between related parties are undertaken on an arm's length basis in accordance with OECD principles and in compliance with the legislative and administrative guidelines of the relevant taxation authorities.

The key international related party dealings which arise as a result of the global nature of the QBE Group are summarised below.

Group Shared Services Centre

QBE operates a shared services centre in the Philippines as a centralised business processing centre for the purposes of achieving operational effectiveness and standardisation of processes across the Group.

Group head office and regional head office services

The QBE Group operates across a broad geographical base, with ongoing opportunities to benefit from international and regional synergies. Group and regional head office locations in Sydney, New York and London operate on a collaborative basis to exploit international scale benefits and share knowledge and best practice for the benefit of all parts of the Group.

Reinsurance

QBE has comprehensive reinsurance arrangements to protect the Group's balance sheet and financial performance, underpinned by an international external reinsurance program in conjunction with reinsurance protection provided by our captive reinsurers, Equator Re and QBE Blue Ocean, which are located in Bermuda. Equator Re and QBE Blue Ocean are critical to the management of the Group's risk appetite and capital through their role in optimising divisional risk retentions and co-ordinating the Group's external global ceded reinsurance program.

Financing

Financing and treasury activities in the Group are managed by an international treasury function through the use of Australian and UK entities to manage relationships with the market.

Investment management

QBE's investment management activities are managed on an international basis by a Group investments team in accordance with investment mandates agreed with each operating entity.

4. Total tax contribution

QBE's total tax contribution for the year ended 31 December 2019 comprises the taxes paid to the numerous tax authorities in respect of taxes and levies on QBE, being:

- **Corporate income taxes** – taxes on the profits of QBE operations in the countries in which we operate, including state income taxes in the US.
- **Employer and payroll taxes** – taxes paid based on the wages of employees and statutory social security contributions made by QBE.
- **Unrecovered GST/VAT** – indirect taxes that QBE incurs but is not able to pass on to an end user, with these taxes being borne by QBE.
- **Premium taxes, levies and excise** – taxes imposed on premiums paid on insurance contracts written by QBE.
- **Other taxes** – taxes such as stamp duties and fringe benefits taxes. These do not include taxes QBE collects on behalf of tax authorities such as recoverable GST or VAT or employee salary withholding tax.

	AUSTRALIA \$M	UNITED STATES \$M	UNITED KINGDOM \$M	REST OF THE WORLD \$M	TOTAL \$M
Corporate income tax	6	(6)	6	46	52
Employer/payroll taxes	18	22	30	7	77
Unrecovered GST/VAT	–	–	16	29	45
Premium taxes and levies	60	48	139	67	314
Other taxes	2	–	9	1	12
Total taxes paid	86	64	200	150	500

5. ATO Australian tax group transparency disclosure

The Australian Taxation Office (ATO) publishes limited tax information in relation to large taxpayers, with the most recent QBE information released to date being for QBE's 2018 tax year (being the year ended 31 December 2017). The ATO publishes three amounts, being total income, taxable income and tax payable. The information disclosed is taken from the income tax return lodged by QBE Insurance Group Limited as the head company of the Australian tax consolidated group.

Total income includes all Australian income, including premium, investment return and dividends from foreign subsidiaries; however, it does not include any business expenses such as the cost of claims, salaries or other operating expenses.

Taxable income is the net profit that is subject to tax and takes into account allowable deductions for business expenses (such as the cost of claims, salaries and other operating expenses) and other tax concessions, including non-taxable dividends from foreign subsidiaries. There is no simple relationship between total income and taxable income.

Tax payable on taxable income is calculated with reference to the Australian corporate tax rate of 30%, adjusted for credits for foreign taxes, franking credits and other tax concessions.

The table below shows the adjustments between the 30% corporate rate and the actual tax payable for the 2019 (being the tax year ended 31 December 2018) and 2018 (being the year ended 31 December 2017) tax years. Items in bold are published by the ATO.

	2019 A\$M	2018 A\$M
Total income	7,871	8,512
Taxable income	62	480
Tax at 30% corporate rate	18	144
Foreign income tax offsets	(6)	(6)
Franking credit rebate	(12)	(11)
Research & Development credits	–	(13)
Tax payable	–	114

The low taxable income in 2019 is primarily due to deductions for large foreign exchange losses on the Group's external debts, with these losses included in the functional currency translation reserve for consolidation accounting purposes. In addition, QBE successfully resolved several issues with the ATO as part of the justified trust reviews, including both industry and QBE specific issues. The resolution of these issues provided a significant one-off reduction in taxable income for the 2019 year.

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