

Enabling a more resilient future



2023 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 13,000 people and has 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 US dollars unless otherwise stated.

About this report

This report is prepared in accordance with the Australian voluntary Tax Transparency Code 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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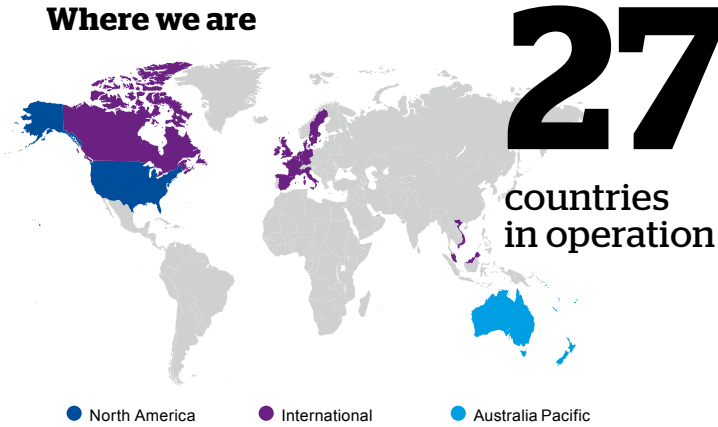


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2023 snapshot

Operational highlights

Where we are



Overall workforce

13,479

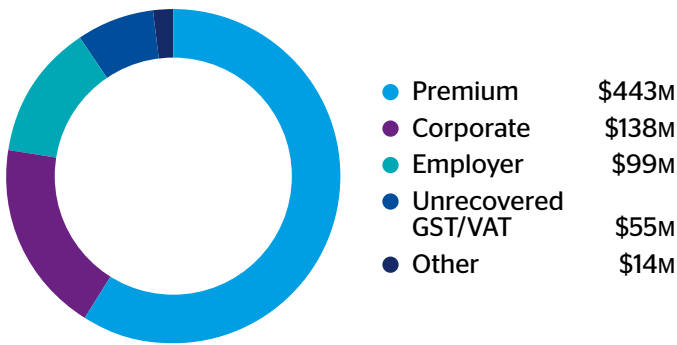
Total number of employees

52.8% Female

47.2% Male

Tax contribution highlights

Total tax contribution



Total taxes paid

\$749M

Australian taxes paid

\$148M

Group income tax expense

\$473M

Australian effective income tax rate

(Income tax expense divided by profit before income tax)

32%

1. Consolidated Group income tax reconciliation from the 2023 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 or loss 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 the year ended 31 December 2023

	AUSTRALIA \$M	UNITED STATES \$M	UNITED KINGDOM \$M	REST OF THE WORLD \$M	TOTAL \$M
Insurance Revenue ¹	4,796	8,205	5,278	2,546	20,826
Profit before income tax	455	71	1,081	230	1,837
Prima facie tax expense at 30%	137	21	324	69	551
Tax effect of non-temporary differences					
Untaxed dividends	(1)	–	(1)	–	(2)
Differences in tax rates	–	(5)	(14)	(23)	(42)
Other, including non-taxable income and non-allowable expenses	7	–	(23)	20	4
Prima facie tax adjusted for non-temporary differences	143	16	286	66	511
Deferred tax assets (re-recognised) derecognised	–	(49)	–	8	(41)
Underprovision in prior years	3	–	–	–	3
Income tax expense (credit)	146	(33)	286	74	473

¹ Insurance Revenue above is based on the tax residence of the legal entity that reports the revenue.

A detailed reconciliation of the Group's accounting profit or loss to income tax expense or credit is provided in the tax note in the Annual Report on page 122.

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 or credit divided by profit or loss 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 or losses arise;
- certain interest expense and financing costs are non-allowable for tax purposes due to restrictions that applied in the period;
- the amortisation expense for certain intangible items is 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	32%	-46%	26%	32%	26%

The Group's effective tax rate in 2023 is reflected by the mix of corporate tax rates in the jurisdictions in which QBE operates.

The effective tax rate for companies operating in the United States is predominantly impacted by accounting adjustments, including:

- profits of Equator Re, which are subject to tax in the United States, are reflected in the Rest of the World in the table above, while the income tax expense is reflected in the United States;
- tax losses have been recognised in the North American tax group to offset current year taxable profits; and
- \$30 million net increase in additional tax losses re-recognised on an accounting basis in the North American tax group due to expected future utilisation of these losses.

2. QBE tax strategy and governance



Compliance with tax legislation and 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 QBE's tax risk management 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 QBE's tax risk management framework with assistance from the Group Head of Tax and divisional CFOs. The Group Head of Tax is responsible for ensuring that policies and procedures are in place, maintained and applied consistently around the world. The Group Head of Tax and Divisional CFOs are responsible for ensuring global tax teams have the skills and experience to operate QBE's tax risk management framework.

The QBE tax risk management framework sets 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 maintain auditor independence.



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 Group 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 on a periodic basis to the Board that the design and operation of the tax risk controls across QBE 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 and Divisional Board Audit Committees on how tax risks are managed, monitored and assured and on improvements that are being made. In this way the Board Audit Committees provide 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 seek to 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 industry 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 Organisation for Economic Co-operation and Development (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.

QBE has adopted a Code of Ethics and Conduct (the Code) that applies to all employees of the QBE Group worldwide. The Code 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, restrictions on 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 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 QBE'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.
Group head office and divisional head office services	QBE operates across a broad geographical base, with ongoing opportunities to benefit from international and divisional synergies. Group and divisional head office locations in Sydney, New York and London operate on a collaborative basis to achieve international scale benefits and share knowledge and best practice.
Reinsurance	QBE has comprehensive reinsurance arrangements to protect its 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 QBE's risk appetite and capital through their role in optimising divisional risk retentions and co-ordinating QBE's external global ceded reinsurance program.
Financing	QBE's financing and treasury activities are managed by a global treasury function through the use of Australian and UK entities to manage relationships with the market.
Investment management	QBE's investment management activities are undertaken on a global basis by the 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 2023 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	18	4	79	37	138
Employer/payroll taxes	25	24	37	13	99
Unrecovered GST/VAT	1	–	15	39	55
Premium taxes and levies	103	71	187	82	443
Other taxes	1	–	9	4	14
Total taxes paid	148	99	327	175	749

Corporate income tax payments differ from income tax expense primarily due to timing differences and the utilisation of historical tax losses.

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 at the date of this report being for QBE's 2022 year (being the tax year ended 31 December 2021). 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 foreign tax credits, franking credits and other tax concessions.

The table below shows the adjustments between the 30% corporate rate and the actual tax payable for the 2023 (being the tax year ended 31 December 2022) and 2022 (being the tax year ended 31 December 2021) tax years. Line items in bold are published by the ATO.

	2023 A\$M	2022 A\$M
Total income	8,481	7,771
Taxable income	78	77
Tax at 30% corporate rate	23	23
Foreign income tax offsets	(2)	(1)
Franking credit rebate	(21)	(15)
Research & Development credits	(0)	(7)
Tax payable	–	–
Effective tax rate	0%	0%

The QBE tax consolidated group had a taxable income for the 2023 year, where tax payable was fully offset by income tax offsets and credits available.



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