AMP Tax Report 2018

1. Message from the Chief Financial Officer

Our purpose is to help customers own their tomorrow by helping them take control of their money and achieve their financial goals. Whether it's retiring right, being debt free, or protecting an income, it's what we've been doing for 171 years. The world has changed immeasurably since our founding in 1849, and while we've evolved and grown to keep pace, our purpose has steadfastly remained on serving our customers, shareholders, investors and the community.

We continue to be proud of the contribution we make to the public finances of the countries in which we operate. We take our tax obligations seriously and our approach to paying tax is built on integrity and transparency. AMP has signed up to the voluntary tax transparency code (TTC) as released by the Board of Taxation in May 2016. This report adopts the voluntary tax transparency code and details the taxes we paid in 2018 and our effective tax rates from 2014–2018.

We also share our approach to tax; a strategy that seeks to ensure we contribute appropriately to the communities in which we operate.

James Georgeson
Chief Financial Officer

2. Introduction

This report provides information on AMP, the tax payments the group makes, and its tax strategy and governance.

The vast majority of AMP's tax liability is payable in Australia. Income tax is levied on profits attributable to AMP shareholders and, for some investment structures, the investment returns generated for its customers. AMP is also subject to payroll, property, goods and services tax (GST), stamp duty and other taxes. AMP also collects and pays Pay As You Go (PAYG) taxes on behalf of employees, withholding tax on behalf of shareholders and investors, and contributions tax on customers' superannuation investments. The payment of Australian income tax by AMP generally results in the generation of imputation credits which are passed to shareholders on payment of dividends; where a shareholder is an Australian taxpayer, they obtain the credit for the tax already paid by AMP.

The information in this report complements the financial information that is published in the AMP 2018 annual report, which is prepared to apply the recognition, measurement and disclosure requirements of international financial reporting standards.

This report also serves to assist with understanding the disclosures that have been made by the Australian Taxation Office (ATO) in its Tax Transparency Report published in December 2019 for our tax year ended 31 December 2017 and the disclosures expected to be made by the ATO later this year in its Tax Transparency Report for our tax year ended 31 December 2018.

3. AMP group

AMP is Australia and New Zealand's leading independent wealth management company, with an expanding international investment management business and a growing retail banking business in Australia.

The holding company of the group, AMP Limited, is listed on the Australian Stock Exchange (ASX) and the New Zealand Exchange (NZX).

AMP business operations are carried out by a number of controlled entities, including an Australian bank and two Australian registered life insurers (however, see below). Each of AMP's business units is wholly owned by AMP Limited, except for the AMP Capital business unit, which is 85% owned by AMP Limited and 15% owned by Mitsubishi UFJ Trust and Banking Corporation, which is domiciled in Japan.

The majority of AMP profits are earned from financial services operations in Australia. Other profits are earned from financial services operations in New Zealand, as well as a number of investment management operations across Asia, Europe and North America.

AMP also has a long-term strategic partnership in relation to the Chinese market through its 19.99% shareholding in China Life Pension Company and a 15% stake in China Life AMP Asset Management Company.

On 8 August 2019, AMP announced a revised agreement with Resolution Life for the sale of AMP Life Limited. This effectively includes the Australian and New Zealand wealth protection and mature business units.

Following the divestment, AMP will comprise the following business units:

- **AMP Australia**, which is comprised of both:
  - The **Australian wealth management** business which provides customers with superannuation, retirement income, investment, self-managed superannuation fund (SMSF) administration and financial advice services (through aligned and owned advice businesses).
  - **AMP Bank**, which is an Australian retail bank offering residential mortgages, deposits, transaction banking, and SMSF products with around 100,000 customers. AMP Bank distributes through brokers, AMP advisers, and direct to retail customers via phone and internet banking.
- **AMP Capital** is a diversified investment manager, managing investments across major asset classes including equities, fixed interest, infrastructure, real estate, diversified funds, multi-manager and multi-asset funds.
- **New Zealand financial services** provides tailored financial products and solutions to New Zealanders through a network of financial advisers. New Zealand financial services has a leading market position in wealth management, in addition to being the market leader in advice and in providing support to advisers. AMP has announced its intention to explore the divestment of this business.

AMP's life insurance entities conduct a wealth management business through separate life statutory funds. For the purpose of preparing AMP Limited's consolidated financial report, income, expenses, assets and liabilities that are attributable to policyholders within the life statutory funds, are consolidated into the AMP group financial statements, together with those attributable to the shareholders of the parent entity.

The business of AMP's life insurance activities relates to the provision of wealth management and life insurance products to investors, referred to as policyholders. The nature of the savings element of this business is that AMP receives premiums and other contributions from policyholders and then invests those funds on behalf of the policyholders. Australian tax law generally taxes policyholder returns and superannuation contributions at different rates in the hands of the life insurer.

In addition to the above business units, AMP has a group office function, which provides centralised services and performs treasury activities.

Under Australian tax law, AMP's Australian corporate entities are organised into two tax consolidated groups, one for AMP Limited and its wholly-owned Australian corporate subsidiaries, and another for AMP Capital Holdings Limited and its wholly-owned Australian corporate subsidiaries. Each of these tax consolidated groups is a group of companies that is generally treated as a single taxpayer for income tax purposes. A small number of partly-owned Australian corporate entities fall outside these tax consolidated groups and are taxed separately on a standalone basis.

Where AMP operates in foreign jurisdictions, it will generally establish separate legal entities in those jurisdictions and be subject to the local tax regime. One notable exception is AMP's life insurance operations in New Zealand, which are conducted through a branch in New Zealand (the operations of this branch are funded by premiums paid by New Zealand policyholders). In some cases, AMP establishes investment vehicles and/or investment assets across multiple jurisdictions. This is discussed further in section 4.

To support its global operations, AMP in Australia provides support services (including administrative and IT support) to its overseas related parties (mainly to AMP New Zealand). In addition, advisory arrangements are entered into between AMP Capital in Australia and its international subsidiaries to support the provision of investment advisory and management services to AMP Capital's global client base. All of AMP's international related party dealings reflect arm's length conditions in accordance with Australia's transfer pricing requirements and the Organisation for Economic Co-operation and Development (OECD) guidelines.

AMP Capital operates a large number of registered managed investment schemes and other pooled investment vehicles. AMP's life insurance entities are significant investors into these vehicles and in many cases this results in control and consolidation of these investment vehicles in the AMP Limited financial statements. In general, those investment schemes and other pooled investment vehicles do not pay tax but are required to attribute taxable income annually, which is then taxed in the hands of the investors.

4. Tax strategy and governance

AMP's tax strategy is focused on integrity in compliance, reporting and enhancing shareholder value.

The strategy is implemented through AMP's tax risk framework. This framework is approved by the AMP Limited Board and supported by governance processes, which ensure it is implemented with continued effectiveness. The framework and supporting governance processes include an escalation requirement for key risks that are outside of the parameters approved by the AMP Limited Board.

AMP Limited has entered into an annual compliance arrangement (ACA) in relation to income tax and goods and services tax (GST) with the Australian Taxation Office (ATO).[1] The primary purpose of the ACA is to formalise a relationship predicated on mutual trust, respect and transparency, and which facilitates interaction and cooperation between the parties. The ATO has acknowledged AMP's continued willingness to maintain a cooperative and open relationship.

In conducting AMP's activities (both in Australia and offshore):

- AMP does not shift to and/or accumulate profits in low- or zero-tax jurisdictions
- AMP does not use the secrecy rules of jurisdictions to hide assets or income, and
- AMP pays tax where the underlying economic activity occurs.

AMP Limited's Board does not sanction or support any activities which seek to aggressively structure AMP's tax affairs.

As part of managing a global investment portfolio on behalf of domestic and international clients, including Australian superannuation funds, AMP uses a variety of structures and entities to enter into offshore markets. The selection of a particular location requires balancing various commercial, legal, investor and cost (including tax) factors. In that context, AMP manages investments through entities in jurisdictions that have alignment with OECD guidelines on tax transparency (ie information exchange with other tax authorities) and in certain instances lower effective tax rates. AMP's public financial reports clearly disclose any 'differences in overseas tax rates' to highlight the impact of the different tax rates that are applied in relation to shareholder profit from offshore activities.

AMP has prepared and lodged its Country by Country Reports with the ATO each year as required. In compliance with both Australian filing requirements and the OECD BEPS Action Plan, the Country by Country Report contains details about AMP's international related party dealings, revenue, profits and taxes paid by jurisdiction. Under intergovernmental exchange of information agreements, this Country by Country Report is available to overseas tax authorities.

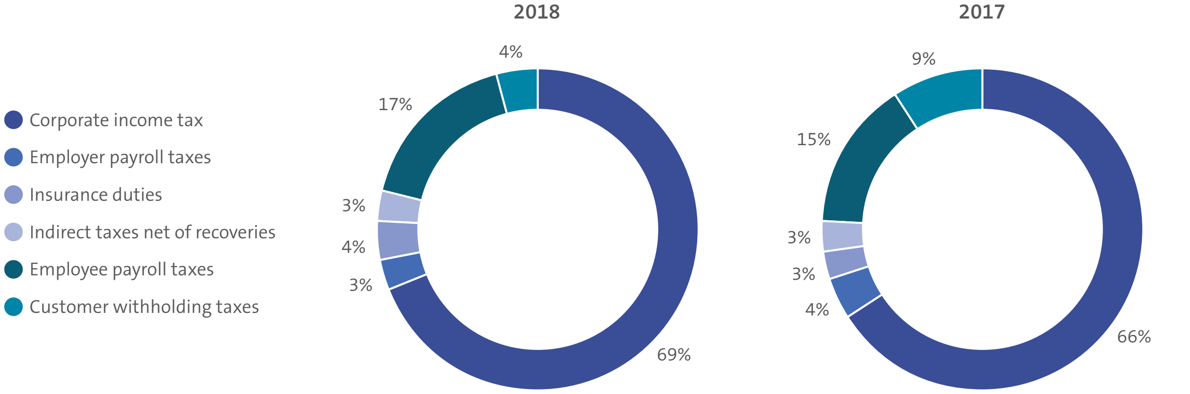
1 The income tax ACA covers the 31 December 2017 year.

5. Tax paid analysis

The below table provides an analysis of the types of taxes that were paid by the AMP group in 2017 and 2018 to the Australian and New Zealand Governments (state and federal). The majority of AMP's operations are in these two countries.

AMP also pays taxes (corporate and withholding tax) to other foreign governments where it conducts economic activity, as well as other taxes (eg property taxes, stamp duty on asset transactions), which have not been included in the table below. The table excludes taxes that are paid by controlled Australian entities, which do not form part of the AMP Limited and AMP Capital Holdings tax consolidated groups.

Taxes paid



2018 – Taxes paid

	Corporate income tax[1] ($m)	Employer/payroll taxes[2] ($m)	Insurance duties[3] ($m)	Indirect taxes net of recoveries[4] ($m)	Total taxes borne[5] ($m)	Employee payroll taxes[6] ($m)	Customer withholding taxes[7] ($m)
Australian federal taxes	954.9	2.7	-	38.9	996.5	234.3	66.4
Australian state / territory taxes	–	47.4	55.6	–	103.0	–	–
New Zealand taxes[8]	72.3	0.5	–	3.2	76.0	12.3	–
Total	**1,027.2**	**50.6**	**55.6**	**42.1**	**1,175.5**	**246.6**	**66.4**

2017 – Taxes paid

	Corporate income tax[1] ($m)	Employer/payroll taxes[2] ($m)	Insurance duties[3] ($m)	Indirect taxes net of recoveries[4] ($m)	Total taxes borne[5] ($m)	Employee payroll taxes[6] ($m)	Customer withholding taxes[7] ($m)
Australian federal taxes	863.7	3.0	–	42.6	909.3	213.3	136.7
Australian state / territory taxes	–	44.4	56.7	–	101.1	–	–
New Zealand taxes[8]	128.9	0.6	–	3.9	133.4	15.1	–
Total	**992.6**	**48.0**	**56.7**	**46.5**	**1,143.8**	**228.4**	**136.7**

1 Tax liability of the AMP Limited and AMP Capital Holdings Limited tax consolidated groups (see further details on pages 8 and page 13 for the $954.9m amount of Australian corporate income tax for the 31 December 2017 year) and the New Zealand branches of AMP Life and The National Mutual Life Association of Australasia. This includes tax of $725m (2016: $571m) that is attributable to Australian policyholders (see further details on page 13 for the $725m amount for the 31 December 2017 year).

2 Comprises payroll and employer taxes that are payable as a result of a company's capacity as an employer (including Australian and New Zealand Fringe Benefits Tax ('FBT')). Figures shown represent payroll tax for the year to 30 June 2018 and 30 June 2017 respectively, Australian FBT for the year to 31 March 2018 and 31 March 2017 respectively, and New Zealand FBT for 2018 and 2017 respectively.

3 Insurance duties that were remitted by AMP to State and Territory Governments in 2018 and 2017 respectively.

4 Comprises GST and other taxes that arise, which cannot be recovered from governments. Figures shown are GST payments for the AMP Life, AMP Services and AMP Capital Investors Australian GST groups, and the New Zealand branch of AMP Life. The GST under management in these groups totalled $715m in 2018 (2017: $715m) (comprising both GST that was remitted to the ATO/New Zealand Inland Revenue Department (IRD) and GST paid to suppliers).

5 Taxes that AMP is obliged to pay to a government on its own behalf (including income tax attributable to policyholders).

6 Employee taxes that are withheld from employee remuneration and paid to governments in the year to 30 June 2018 and 30 June 2017 respectively.

7 Taxes that are withheld from customer returns and remitted to governments in 2018 and 2017 respectively (including PAYG and no-TFN withholding tax).

8 Amounts denominated in New Zealand dollars have been converted to Australian dollars at the 2018 average exchange rate of $A1 = 1.1164 (2017: A$1 = NZ$1.0767).

6. Effective tax rate

'Effective tax rate' is a term that is used in public discourse, and in this report, to refer to the income tax expense that is charged as a percentage of total profit before the income tax expense is charged. Income tax expense is an accounting concept and reflects the amount of income tax accrued for accounting purposes. Typically, in any given year, there will be differences between the income tax charge and the amount paid for the period to the ATO, due to timing differences.

For accounting purposes, income tax includes only taxes that are based on taxable profits and excludes other types of taxes, such as GST, stamp duty, superannuation contributions tax, and PAYG tax that is paid on behalf of superannuation members and employees.

Most of AMP's shareholder income tax responsibilities arise in Australia where tax is levied at the corporate tax rate of 30% of the taxable income of the business. Taxable income is a tax legislation concept and differs from total profit before income tax expense for reasons that reflect government policies which apply for each accounting tax year. For example, Australian tax concessions that reduce the effective rate of tax are established government incentives to promote Australian innovation (eg research and development concession [R&D]) and the Australian financial services industry (eg offshore banking unit [OBU] concession).

The effective tax rate is also impacted by the fact that the corporate tax rate that is applicable to NZ taxable income (28%) is less than the Australian rate.

The total income tax expense that is disclosed in AMP's financial report consists of both income tax on shareholder profit, and also tax on investment returns of policyholders. When making a comparison to the Australian corporate tax rate of 30%, it is appropriate to first deduct the amount of tax that is attributable to policyholders, and then compare the amount of tax that is attributable to shareholders to the amount of profit after policyholder tax, but before shareholder tax.

AMP's total income tax expense that is attributable to shareholders is -55% (2017: 25%) of the profit after policyholder tax, but before shareholder tax. The negative tax expense in 2018 mainly arises from the impact of prior year items (overs and unders and recognition of PY tax losses) and the rate is amplified by the low shareholder profit for the year.

The following table provides details on the actual amounts and circumstances involved in the AMP income tax applicable to the years of 2014–2018 inclusive.

Relationship between income tax expense and accounting profit

	2018		2017		2016		2015		2014	
	$m	%	$m	%	$m	%	$m	%	$m	%
Profit before income tax, excluding tax charged to policyholders	**33**	**100%**	**1,164**	**100%**	**237**	**100%**	**2,041**	**100%**	**1,274**	**100%**
Prima facie tax at the rate of 30%	10	30%	349	30%	71	30%	612	30%	382	30%
Tax effect of differences between amounts of income and expenses recognised for accounting, and the amounts deductible/taxable in calculating taxable income										
– R&D concession[1]	-6		-7		-4		-9		-10	
– OBU[2]	-1		-1		-1		-2		-2	
– Non-taxable income[3]	-6		-16		-5		-14		-11	
– Non-deductible expenses	23		27		219		10		7	
– Other items[4]	-15		-24		-159		-205		-13	
Differences in overseas tax rate[5]	-9		-14		-9		-7		-7	
	-14	-42%	-35	-3%	41	17%	-227	-11%	-36	-3%
Prima facie tax adjusted for income and expenses accounting/tax differences and differences in overseas tax rates	**-4**	**-12%**	**314**	**27%**	**112**	**47%**	**385**	**19%**	**346**	**27%**
Shareholder impact of life-insurance treatment[6]	2	6%	33	3%	16	7%	11	1%	30	2%
'One-off' tax expense adjustments relating to transactions or events which occurred in one or more previous financial years										
– (Over) under provided in previous years[7]	-8		-3		-14		-25		-17	
– Utilisation of previously unrecognised tax losses[8]	-8		-53		-69		-43		-56	
	-16	-49%	-56	-5%	-83	-35%	-68	-4%	-73	-5%
Total income tax expense attributable to shareholders, recognised for accounting purposes	**-18**	**-55%**	**291**	**25%**	**45**	**19%**	**328**	**16%**	**303**	**24%**

1 Australian tax law provides a government incentive of an 8.5% additional net tax benefit (10% in the 2014–2016 years) for qualifying R&D activities that is undertaken by corporates, up to a limit of $10m per annum.

2 Profit from certain eligible funds management activities undertaken by AMP for non-residents are taxed at a concessional tax rate of 10% under the offshore banking unit regime.

3 This amount includes the impact of imputation credits that apply to dividends that are received on shareholder investments.

4 In 2016, includes the tax effect of $513m (2015: $723m) profit that is attributable to non-controlling interests in investment entities that are controlled by the AMP life insurance entities' statutory funds, which is not subject to tax in the hands of AMP. The taxation of these profits in the hands of the owners of the non-controlling interests will vary depending upon their jurisdiction and individual circumstances. If these profits were excluded from the above analysis, AMP's effective tax rate would have been 35% higher in 2016 (2015: 9% higher). The controlling interest held by AMP is taxed on a similar basis to other investments of the AMP life insurance entities' statutory funds.

5 A relatively small part of AMP's operations are in jurisdictions with tax rates other than 30% (principally New Zealand where the corporate tax rate is 28% and also the UK where the corporate tax rate is 19%).

6 Profit before tax is impacted by the method for allocating to shareholders 20% of the 'after tax' profits of the participating business book, in both Australia and New Zealand, resulting in the prima facie tax expense not equalling the income tax expense for accounting purposes. The factors affecting the difference vary from period to period and reflect variations in investment returns, including bond rates, variations in levels of premiums and claims, and tax treatment compared to tax treatment in New Zealand. In addition, New Zealand tax law provides a concessional tax treatment for life insurance business. This concession ceased to apply after 30 June 2015.

7 Over/under provided in previous years relates to the subsequent adjustment of tax estimates that were made in prior periods. This occurs as a result of data impacting the estimate, changes to expectations of how tax law should be applied to certain transactions, and retrospective adjustments to tax legislation.

8 Shareholder tax expense is reduced due to the recoupment of tax benefits that AMP or an entity it acquired became entitled to as a result of losses in a previous period, but which had not been recognised for accounting purposes at the time the losses occurred. AMP's tax losses stem primarily from the acquisition of the GIO insurance business in 2000 and the demerger of the UK operations in 2003. At 31 December 2018, AMP had unutilised tax capital losses carried forward, which could result in a future tax benefit of $706m. These tax benefits can only be booked to the extent that it becomes probable that sufficient applicable taxable capital gains will be made to utilise the losses. In addition, at 31 December 2018, AMP has unutilised tax losses on revenue account, which could result in a future tax benefit of $111m arising from the acquisition of businesses with carried forward tax losses. These are available to offset against taxable income at a constrained rate (approximately 0.6% of AMP's ordinary class taxable income per annum).

7. Tax transparency disclosures for the year ended 31 December 2017 and 31 December 2018

The following tables outline income tax return data for AMP Limited and AMP Capital Holdings Limited for the tax years ended 31 December 2017 and 31 December 2018. The data represents information that has been disclosed by the ATO in December 2019 for the 31 December 2017 year and information expected to be disclosed by the ATO later this year for the 31 December 2018 year under tax transparency legislation. These disclosures apply to AMP's Australian income tax position and do not cover any foreign taxes.

This income tax return data contains both tax attributable to shareholder and policyholder related profits, and will therefore differ from the effective tax rate analysis in section 6 of this report, which only relates to tax on shareholder profits.

The ATO has published documents on its website that provide background on its corporate tax transparency report, and acknowledges that for companies that include a life insurance business (eg AMP), the effective tax rate for accounting purposes will be impacted by the aggregation of shareholder and policyholder tax. The ATO has also noted that differing applicable tax rates, in particular the 15% rate for superannuation, may give an impression of an artificially-low tax paid. These documents also comment on the impact of certain items, including the research and development tax concession (R&D) and imputation credits.

The below data was released by the ATO in December 2019 and was sourced from the AMP Limited and AMPCH 31 December 2017 year Australian income tax returns:

	Gross income ($m)[1]	Taxable income ($m)[2]	Tax payable ($m)
AMP Limited	32,206	7,931	905
AMP Capital Holdings	893	171	50
Total	**33,099**	**8,102**	**955**

1 Gross accounting income for AMP and its wholly owned Australian subsidiaries and their foreign branches as disclosed in the tax returns, prior to offsetting expenses (such as claims, commissions, employee costs or interest). This is not readily comparable to AMP's income statement, which also includes income from foreign subsidiaries and Australian entities that fall outside of the tax consolidated groups.

2 Under Australian tax law, AMP Limited has two classes of taxable income (ordinary class and complying superannuation class). Ordinary class taxable income of $1,490m is taxed at the corporate tax rate of 30%, and complying superannuation class taxable income of $6,440m is taxed at a statutory tax rate of 15%. The taxable income shown above for AMP Limited is the total of both classes of taxable income.

We expect the below data will be released by the ATO later this year and will include the following information from the AMP Limited and AMPCH 31 December 2018 year Australian income tax returns:

	Gross income ($m)[1]	Taxable income ($m)[2]	Tax payable ($m)
AMP Limited	28,665	7,370	727
AMP Capital Holdings	884	118	34
Total	**29,549**	**7,488**	**761**

1 Gross accounting income for AMP and its wholly owned Australian subsidiaries and their foreign branches as disclosed in the tax returns, prior to offsetting expenses (such as claims, commissions, employee costs or interest). This is not readily comparable to AMP's income statement, which also includes income from foreign subsidiaries and Australian entities that fall outside of the tax consolidated groups.

2 Under Australian tax law, AMP Limited has two classes of taxable income (ordinary class and complying superannuation class). Ordinary class taxable income of $678m is taxed at the corporate tax rate of 30%, and complying superannuation class taxable income of $6,692m is taxed at a statutory tax rate of 15%. The taxable income shown above for AMP Limited is the total of both classes of taxable income.

Why tax does not equal 30% of taxable income

Separate tax treatment for life insurance business

AMP's tax profile differs to other Australian corporates due to the significance of its life insurance and superannuation businesses.

Under the tax rules for life insurance businesses, a significant portion of AMP's gross income, as reported in its tax returns, is either not subject to tax (not included in taxable income) or is subject to a concessional rate of tax where it relates to policyholder interests. This includes:

- certain life insurance premiums that are invested in AMP out of after-tax earnings by policyholders which are not subject to further contributions tax
- income relating to AMP's pension business is exempt from tax, consistent with the taxation of retirement phase earnings in a superannuation fund, and
- income relating to complying superannuation business, which is taxed at 15%, consistent with the taxation of standalone complying superannuation funds.

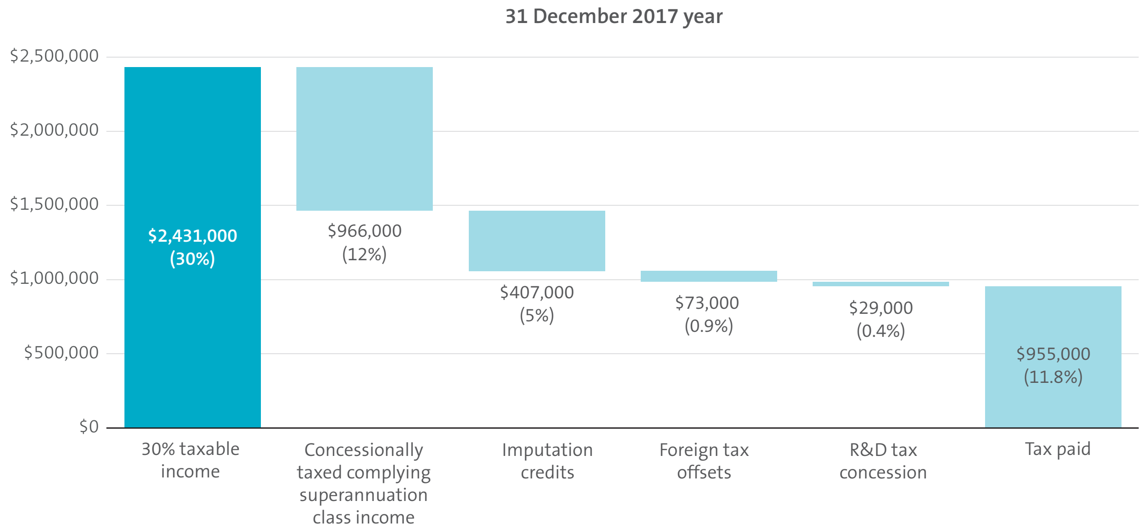
Breakdown between the statutory rate of 30% and AMP's tax rate

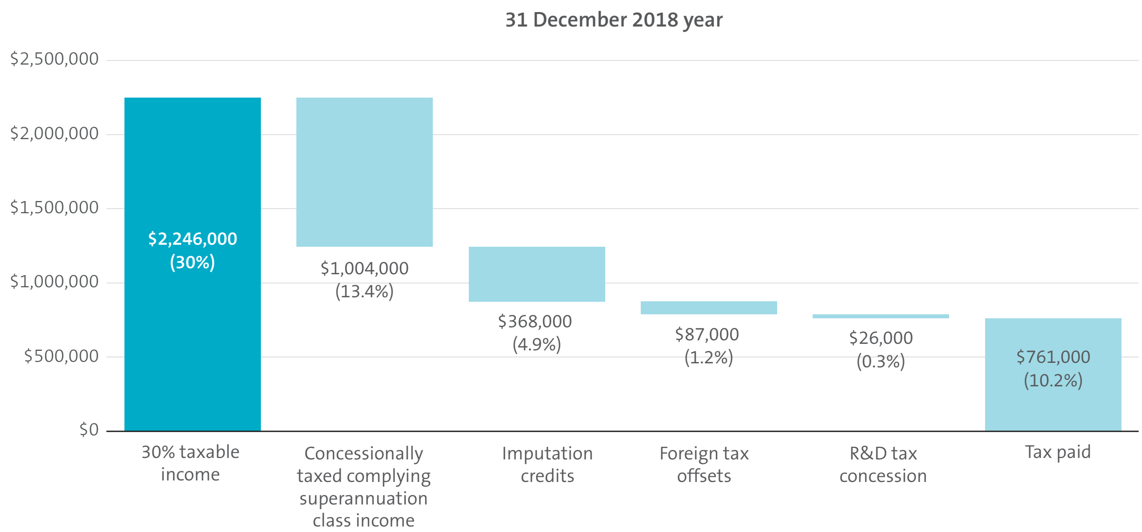
The $1.5bn difference between AMP's actual tax payable of $955m and a notional tax payable on $8,102m of taxable income at a rate of 30% of $2,413m for the 31 December 2017 year ($1.5bn for the 31 December 2018 year) is a result of the following:

– Complying superannuation class income is taxed at a concessional rate of 15%, consistent with the rate of taxation on complying superannuation funds. This contributed a $966m reduction to tax from a 30% tax rate for the 31 December 2017 year ($1,004m for the 31 December 2018 year).
– AMP receives imputation credits from franked dividends, which reduce its tax payable. These imputation credits arise on dividends that are received by AMP and have been paid from taxed profits. This prevents double taxation of these profits. This contributed a $407m reduction to tax from a 30% tax rate for the 31 December 2017 year ($368m for the 31 December 2018 year).
– Foreign tax offsets, which reflect payments of foreign tax by AMP, are allowed as a credit against Australian tax to prevent a double taxation. This contributed a $73m reduction to tax from a 30% tax rate for the 31 December 2017 year ($87m for the 31 December 2018 year).
– AMP receives R&D tax offsets from conducting R&D activities in Australia. Under the relevant Australian tax law, R&D expenditure was not deductible and gave rise to a 38.5% tax offset, which is equivalent to an 8.5% tax concession. This contributed a $29m reduction to tax from a 30% tax rate[1] for the 31 December 2017 year ($26m for the 31 December 2018 year).

Analysis of gap to 30% of taxable income

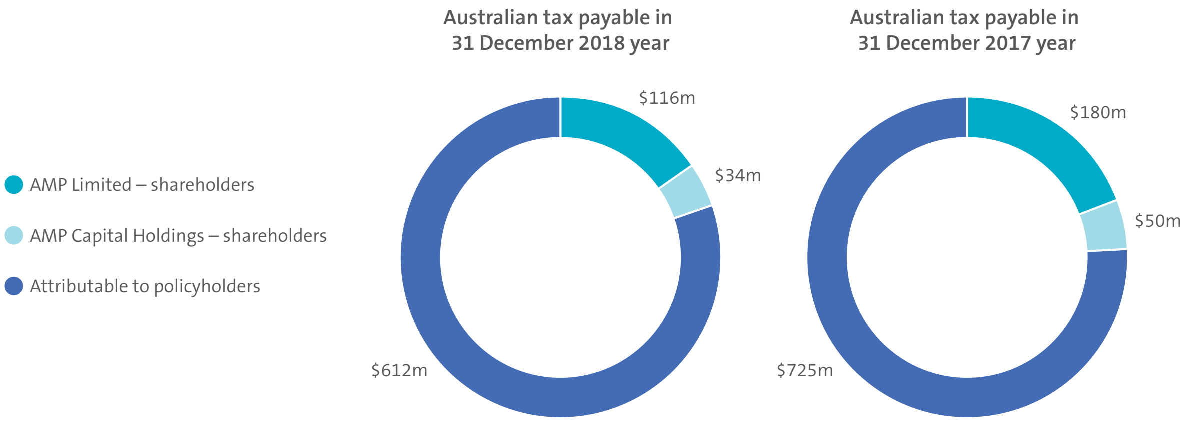
The impact of these items on AMP's tax payable in the 31 December 2017 and 31 December 2018 years is illustrated in the charts below:





1 The R&D tax offset represents the value of tax deductions for R&D expenditure (at 30%) plus an additional 8.5% R&D tax concession.

Shareholder vs policyholder tax



The table below and the following footnotes summarise AMP's taxable income and the Australian tax payable by each part of AMP's business for the 31 December 2017 and 31 December 2018 years:

31 December 2018 year

	AMP Limited – shareholders ($m)	AMP Capital Holdings – shareholders ($m)	Total attributable to shareholders ($m)	Attributable to policyholders ($m)	Total ($m)
Taxable income	495	118	**613**	6,875	**7,488**
Tax	148[1]	35[1]	**183**	1,059[2]	**1,242**
Tax offsets[3]	(32)	(2)	**(34)**	(447)	**(481)**
Tax payable	**116**	**34**	**150**	**612**	**761**

31 December 2017 year

	AMP Limited – shareholders ($m)	AMP Capital Holdings – shareholders ($m)	Total attributable to shareholders ($m)	Attributable to policyholders ($m)	Total ($m)
Taxable income	864	171	**1,035**	7,067	**8,102**
Tax	259[1]	51[1]	**310**	1,154[2]	**1,464**
Tax offsets[3]	(79)	(1)	**(80)**	(429)	**(509)**
Tax payable	**180**	**50**	**230**	**725**	**955**

1 Shareholder income is subject to tax at a 30% tax rate.

2 Policyholder income is subject to tax at either 30%, 15% or exempt from tax (as discussed above).

3 Tax offsets include research and development tax (R&D) offsets, imputation credits that are received by AMP on dividends and foreign tax offsets.

Difference between tax payable and income tax expense

The tax payable that is disclosed in the tax return of AMP Limited and AMP Capital Holdings (AMPCH) differs to the shareholder income tax expense of $291m, which is disclosed in AMP's 2017 accounts and 2018 tax report (income tax credit of $18m in AMP's 2018 accounts), for reasons including:

- the total tax payable includes tax referable to policyholder income, which is not included in shareholder tax expense
- timing differences in respect of the recognition of income and expenses for tax and accounting purposes (eg gains on investments are not included in taxable income until the investments are realised, capitalised losses for insurance business which are not immediately deductible for tax purposes)
- AMP's shareholder income tax expense includes foreign taxes, as well as Australian tax referable to entities that are not included in the AMP Limited and AMPCH consolidated tax groups (eg income of AMP's foreign branches already taxed overseas are not subject to further Australian tax).

Further, the tax payable that is attributable to policyholders and which is disclosed above, represents the cash tax paid in respect of the 31 December 2017 and 31 December 2018 years. The policyholder income tax expense disclosed in AMP's 2017 accounts of $472m (income tax credit of $399m in the 2018 accounts) represents both current and deferred tax expense/(benefit), which is expected to be paid in future income years.

This report is regarded as complying with the duty under paragraph 16(2), Part 2 of Schedule 19 of the UK Finance Act 2016 for 2017, 2018 and 2019 on behalf of all relevant entities within the AMP group.

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