

# Brambles

Tax Transparency Report 2023

For the Year ended 30 June 2023



# Brambles' purpose is to connect people with life's essentials, every day.

As a pioneer of the sharing economy, Brambles is one of the world's most sustainable logistics businesses and the world's largest brands trust Brambles to help them transport the goods that matter more efficiently, safely and sustainably.

## What Brambles does:

Brambles' platforms form the invisible backbone of global supply chains. Through its CHEP brand, Brambles primarily serves the fast-moving consumer goods, fresh produce, beverage, retail and general manufacturing industries.

Its circular business model facilitates the 'share and reuse' of the world's largest pool of reusable pallets and containers.

This enables Brambles to serve its customers while minimising impact on the environment and improving the efficiency and safety of supply chains around the world.

### As at 30 June 2023, Brambles:



Operated in...

**~60**  
countries



Owned...

**~353 million**  
pallets, crates  
and containers



Employed...

**~12,000**  
people



Through a network of...

**750+**  
service centres



# Introduction from the Chief Financial Officer

I am pleased to present Brambles' Tax Transparency Report for 2023, which provides an understanding of Brambles' tax profile, tax contributions and how we manage our tax obligations and make economic contributions to the countries in which we operate. This report is prepared in accordance with the Australian Voluntary Tax Transparency Code.

Brambles' Code of Conduct provides an ethical and legal framework for all employees. Our Tax Policy aligns with the principles of the Code of Conduct and applies to Brambles businesses globally.

At Brambles, we are committed to transparency and effective tax risk management in keeping with our strong corporate governance, risk management and ESG credentials. We maintain documented policies and procedures for tax risk management and seek to comply with all statutory obligations, making full disclosure to tax authorities. We do not seek to avoid tax using artificial arrangements, or tax haven jurisdictions, lacking business purpose. The disclosures about our tax policies and international tax footprint included in this report highlight our commitment to transparency as we seek to exhibit best practice standards in accordance with the recommendations of the Voluntary Code.

## FY23 effective tax rate and tax contribution

Brambles' FY23 effective tax rate on Continuing Operations was 30.7%. This was 0.5 percentage points higher than the 30.2% effective rate for FY21.

The increase in effective income tax rate was primarily due to an increased charge for Base Erosion and Anti-Abuse Tax ("BEAT") in the US. This tax is charged on intra-group charges including management fees and interest payments which are taxable in Australia and the UK. In previous periods BEAT was reduced by US tax losses.

Brambles global tax contribution from Continuing Operations was US\$340.1 million reflecting a range of taxes set out on page 6 and in Appendix 1 of this report. The amount paid represents an increase of US\$27.5 million on the prior financial year primarily driven by an increase in taxes paid in the US, particularly in relation to BEAT.

### FY23 effective income tax rate<sup>1</sup>

# 30.7%

(30.1% on Underlying Profit)

↑ Up from 30.2% in FY22<sup>2</sup>

### FY23 income tax expense<sup>1</sup>

# US\$287.1m

↑ Up from US\$247.9 million in FY22<sup>2</sup>

### Global tax contribution<sup>1</sup>

# US\$340.1m

↑ Up from US\$312.6 million in FY22<sup>2</sup>

## FY23 key tax developments

On 31 March 2023, completion took place of the agreement to combine the operations of CHEP China and CHEP Hong with Loscam (Greater China) Holdings Limited. The estimated tax charge on the book gain of US\$67.3 million was US\$4.4 million.

Pillar 2 of the OECD Inclusive Framework on Base Erosion and Profit Shifting seeks to put a floor on corporate income tax rates and reduce the incentive for profit shifting by requiring multinationals to pay a minimum corporate tax rate of 15% in each jurisdiction in which they operate. Multinationals will need to calculate their effective tax rate in each jurisdiction and pay top-up tax for the difference between their effective tax rate and the 15% minimum rate. Any resulting top-up tax is generally charged in the jurisdiction of the ultimate parent, i.e. Australia for Brambles.

The rules are expected to be adopted by most OECD member countries, and others, for accounting periods starting after 1 January 2024, i.e. from FY25 for Brambles. Participating countries, including Australia, are at various stages of implementing Pillar 2 into local law, with legislation already enacted in the UK and the a EU Minimum Tax Directive adopted by Member States.

Brambles' preparation for the implementation of Pillar 2 is ongoing and will continue in FY24. We do not have material operations in low tax jurisdictions and do not expect these rules to have a significant impact on the group's global tax contribution.

Nessa O'Sullivan,  
Chief Financial Officer

9 October 2023

<sup>1</sup> Continuing Operations.

<sup>2</sup> CHEP China (formerly part of CHEP Asia-Pacific), has been recognised in discontinued operations in FY23 following the completion of the merger with Loscam (Greater China) in March 2023. Prior year comparatives have been restated.

# Tax policy

This Tax Policy is based on the principles of tax compliance and tax transparency recognising the role Brambles plays in building awareness and trust in the tax system internationally and forms part of Brambles' Code of Conduct.

## Introduction

Brambles is committed to complying with tax laws and to having open and constructive relationships with tax authorities. Taxation laws are inherently complex, and Brambles seeks to comply with the laws by paying the right amount of tax in the correct jurisdiction, disclosing relevant information, and claiming reliefs or incentives where they are available. We support greater transparency of companies' tax payments and processes, in order to build public trust and have adopted the Voluntary Tax Transparency Code of the Australian Board of Taxation.

We pay corporate income taxes, withholding taxes, customs duties, employment and other taxes. In addition, there are taxes we collect on behalf of governments from employees and customers such as sales tax and VAT. The taxes we pay and collect form a significant part of the economic contribution to the countries in which we operate.

Our commitment is underpinned by the following principles:

## 1. Tax risk management and governance framework

We follow Brambles' 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 the following risks:

- Operation and Transaction risks – the risk of inadequate tax consideration, expertise and judgement into business transactions, and poor implementation or management of key risks, including inadequate documentation to support positions taken. Key controls include sign-off by key functional areas including Group Tax in accordance with an approvals framework and obtaining external advice and opinions or tax authority agreement where the law is uncertain;
- Compliance risk – the risk of late or inaccurate tax returns. Key controls include a central database monitoring the lodgement of tax returns, and the use of external accounting firms to prepare or review such returns;
- Tax accounting risk – the risk of material financial misstatement as defined in the relevant accounting standards. Key controls include providing tax accounting instructions to financial statement preparers, and review and sign-off of material tax balances by Group Tax;
- Regulatory and management risk – the risk associated with new laws and management of the tax function. Key controls include ensuring that appropriate policies and procedures are in place, maintained and used consistently around the world, and that the global tax team has the skills and experience to implement the approach appropriately; and

- Tax reporting risk – the risk that there is inadequate reporting of tax risks to senior management and the Brambles Board. Key controls include maintaining and periodically reporting to key stakeholders on the Group's tax profile reflecting matters such as significant transactions, fiscal authority audits, regulatory changes and monitoring the effectiveness of key controls and processes.

Material tax issues and risks, when identified, are reported to the Brambles Audit & Risk Committee and Brambles Board.

## 2. Level of risk in relation to taxation Brambles is prepared to accept

The effective management of risk, including tax risk, is vital to the continued growth and success of Brambles. We incorporate effective risk management as part of our business processes. Brambles has designed and implemented internal control systems and risk management processes, including those relevant to tax risk, and these are reviewed by the Board.

Internal governance procedures impact on acceptable levels of risk by:

- Identifying, analysing and ranking risk issues, including tax, in a consistent manner, using a common methodology;
- Making our risk tolerance for tax issues a key consideration in our decision making; and
- Requiring approval by senior management, or the Board, for transactions according to an approval process having regard to the level of risk and materiality of the consequences involved.

We adhere to relevant tax law and we seek to minimise the risk of uncertainty or disputes. For material transactions we seek certainty, for example by way of obtaining external advice and legal opinions or agreement with tax authorities where the law is uncertain or complex.

## 3. Tax strategy and planning

Brambles Code of Conduct states that all business should be conducted in accordance with the laws and regulations in the countries in which the business is located. Our tax strategy and planning supports our business strategy and reflects commercial and economic activity. Relevant Brambles Group stakeholders are involved, according to an approval process having regard to the level of risk and materiality of the consequences involved, to ensure transactions are acceptable, including Brambles Board, CEO, CFO, and commercial, legal, treasury and accounting functions.

We conduct transactions between group companies on an arm's-length basis and in accordance with Organisation for Economic Co-operation and Development (OECD) Transfer Pricing Guidelines.

Brambles does not seek to avoid tax using artificial arrangements, or tax haven jurisdictions, lacking business purpose.

## 4. Approach towards tax authorities

We seek to build and sustain relationships with governments and fiscal authorities that are constructive and based on trust and mutual respect. Brambles complies with the tax laws in each country, but should any inaccuracies arise, these will be voluntarily and fully disclosed to taxation authorities.

We work pro-actively and transparently with fiscal authorities with the objective of minimising disputes and reaching agreement on any areas of disagreement on a timely basis wherever possible. As part of our approach to dispute resolution we consider all legitimate avenues, including arbitration, mutual agreement and where considered appropriate appeal procedures to achieve certainty over tax treatments.

We engage with governments, and its various bodies, on the development of tax laws, and their administrations, either directly or through trade and other similar associations as appropriate.

Our approach is evidenced by the outcome of compliance and assurance reviews undertaken by tax authorities, including a Stage 3 rating for tax risk management and governance and a High Level rating for overall assurance by the Australian Taxation Office and a Low Risk rating by Her Majesty's Revenue and Customs, which demonstrate that Brambles' tax control framework has been designed and is operating effectively.

## 5. Roles & Responsibilities

The following table provides an overview of the roles and responsibilities for tax risk management within the Brambles group:

Role	Responsibility
Brambles Board	Brambles Limited's board is responsible for setting the Group's risk appetite and its risk management framework and overseeing the systems of internal control including approval of the Tax Policy.
Audit & Risk Committee	The Audit & Risk Committee assists the Board in fulfilling its corporate governance and oversight responsibilities including the effectiveness of the management of the Group's material risks, including tax risks.
Chief Financial Officer (CFO)	The Chief Executive Officer has principal responsibility for risk management whilst the CFO is primarily responsible for managing Brambles's financial risks, including tax risks. The reporting of these risks to the Audit & Risk Committee and Brambles Board forms part of the bi-annual risk report to these respective bodies.
Group Vice President, Taxation (Group VP, Tax)	The Group VP Tax is responsible for the design of the Tax Policy and the tax risk management framework and ensuring that appropriate processes and controls are maintained and providing specialist support.
Regional Vice Presidents, Taxation (Regional VP's Tax)	The Regional VP's Tax and their teams are responsible for ensuring compliance with the Tax Policy at a regional level, maintaining the tax risk management framework and providing specialist support to the regional business units.
Group Financial Controller	The Group Financial Controller is responsible for monitoring compliance with local laws and regulations and reporting exceptions such as late filed returns to the Audit & Risk Committee twice yearly.
Regional Financial Controllers	Regional Financial Controllers are responsible for compliance with local legislation and Tax Policy at an entity level from processing of transactions through to reporting and the filing of tax notices and returns with support from external advisers and Regional VP Tax, as appropriate.
Internal Audit	Internal Audit is responsible for the periodic testing of controls and reporting findings. A description of the controls testing shall be maintained as part of the audit program.

## 6. UK Legislative Requirements

This document is published in accordance with Paragraph 19(2) of Schedule 19 of the Finance Act 2016 for the financial year ended 30 June 2023.

## 7. Board Approval

The Tax Policy was approved by the Brambles Board on 27 June 2023.

# Tax contribution summary

Provided below is a summary of Brambles' total taxes paid to Australian and overseas tax authorities by geographic region for the financial years ended 30 June 2023 and 30 June 2022.

## Year ended 30 June 2023

Region	Corporate Income Tax <sup>3</sup> US\$m	Employment taxes <sup>4</sup> US\$m	Property/real estate taxes US\$m	Green taxes and other taxes <sup>5</sup> US\$m	Total tax contribution US\$m
Australia	63.1	5.1	3.1	0.0	71.3
Americas	68.9	32.1	29.8	3.1	133.9
EMEA	79.3	47.2	2.5	1.8	130.8
Asia Pacific	3.4	0.5	0.2	0.0	4.1
<b>Total</b>	<b>214.7</b>	<b>84.9</b>	<b>35.6</b>	<b>4.9</b>	<b>340.1</b>

## Year ended 30 June 2022

Region	Corporate Income Tax <sup>3</sup> US\$m	Employment taxes <sup>4</sup> US\$m	Property/real estate taxes US\$m	Green taxes and other taxes <sup>5</sup> US\$m	Total tax contribution US\$m
Australia	72.9	4.7	2.7	0.0	80.3
Americas	35.7	25.5	25.4	1.8	88.4
EMEA	93.3	43.0	2.9	2.4	141.6
Asia-Pacific	1.6	0.5	0.2	0.0	2.3
<b>Total</b>	<b>203.5</b>	<b>73.7</b>	<b>31.2</b>	<b>4.2</b>	<b>312.6</b>

This information has been prepared in accordance with the Basis of report preparation section on page 10 of this Report.

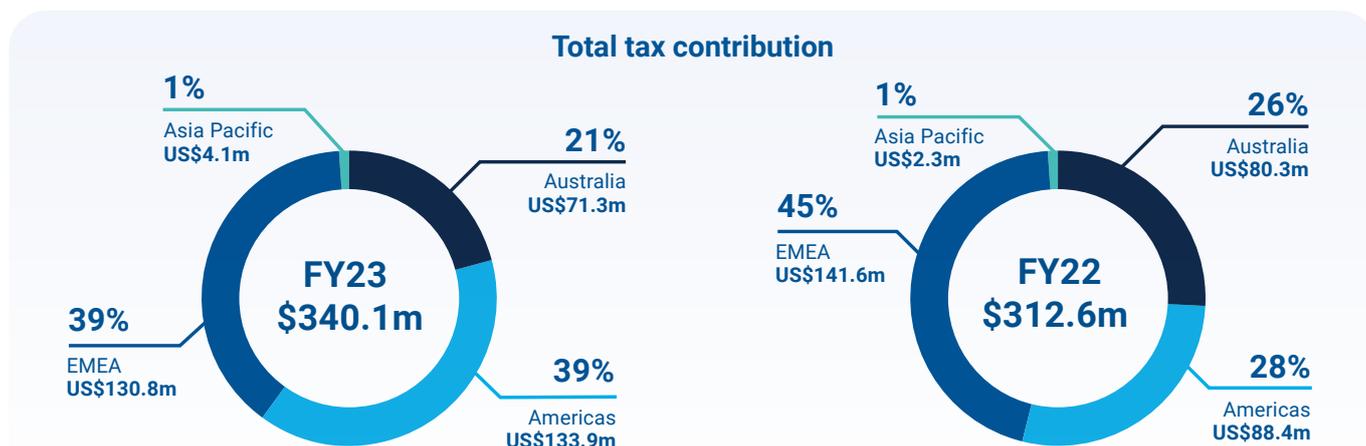
This table does not include:

- Discontinued operations including the CHEP China business which merged with Loscam (Greater China) Holdings Limited on 31 March 2023; and
- Taxes collected and paid by Brambles on behalf of others (e.g. VAT/GST and payroll withholding taxes).

The decrease in Australian Corporate Income Tax paid from FY22 to FY23 is primarily due to a higher tax instalment payment rate in FY22 than in FY21, which resulted in a lower FY22 final Corporate Income Tax payment in FY23.

The decrease in Corporate Income Tax paid in EMEA from FY22 to FY23 was largely due to tax payments made in Poland in FY22 in relation to intangible services, subsequently refunded after agreement of the treatment with the tax authorities, and reduced tax payments in the UK due to enhanced capital allowance deductions.

The increase in Corporate Income Tax paid in Americas from FY22 to FY23 was primarily due to increased payments for Base Erosion and Anti-Abuse Tax ("BEAT") in the US, together with FY22 including a federal tax refund for FY21, and tax paid on higher taxable profits in Mexico.



<sup>3</sup> Includes income taxes paid to US State tax authorities.

<sup>4</sup> Includes e.g. Australian Fringe Benefits Tax, UK Employers' National Insurance Contributions.

<sup>5</sup> Includes e.g. Romanian packaging tax, UK landfill tax.

# Income Taxes disclosed in 2023 Annual Report

The income tax expense (ITE) disclosed in Brambles' Annual Report is calculated in accordance with Australian Accounting Standards which are consistent with International Financial Reporting Standards (IFRS).

In any year, there will be differences between the ITE calculated in the Annual Report and the amount of income taxes payable for the period to relevant taxation authorities. This is due to a number of timing differences between the accounting and tax treatment of various items of income and expense, such as:

- differences between accounting and tax depreciation rates on fixed assets;
- accounting differences between group accounts and local statutory accounts;
- group companies making losses, or using brought forward tax losses to offset current year profits; and
- expenses which are only tax-deductible when paid.

There will also be differences between the income taxes payable for a given period and the total income tax actually paid to tax authorities during the year. This is due to a variety of factors, such as the timing of corporate income tax instalment payments, and final tax payments being made (or refunds received) for prior periods following the submission of tax returns.

## Reconciliation of worldwide accounting profit to income tax expense

### Brambles Limited Consolidated Worldwide Group

	Australia 2023 US\$m	Americas 2023 US\$m	EMEA 2023 US\$m	Asia-Pacific 2023 US\$m	Total 2023 US\$m	Total 2022 <sup>6</sup> US\$m
<b>Continuing Operations</b>						
Profit before tax	224.0	261.4	425.8	23.0	934.2	821.7
<b>Tax at the Australian rate of 30%</b>	<b>67.2</b>	<b>78.4</b>	<b>127.7</b>	<b>6.9</b>	<b>280.2</b>	<b>246.5</b>
Increase in income tax expense due to:						
Non-deductible expenses	1.5	3.3	2.3	(0.1)	7.0	9.1
Tax losses written off or not recognised	0.0	0.0	0.7	0.0	0.7	1.0
Unrecoverable foreign withholding taxes	2.2	2.8	7.8	0.1	12.9	11.6
Change in tax rates	0.0	(0.2)	5.7	0.0	5.5	5.7
Other differences <sup>7</sup>	3.2	21.0	(2.5)	0.3	22.0	12.9
Decrease in income tax expense due to:						
Effect of tax rates in other jurisdictions	0.0	(9.1)	(29.9)	(0.5)	(39.5)	(36.3)
Prior year tax losses recouped/recognised	0.0	(0.3)	(0.7)	(1.2)	(2.2)	(2.5)
	<b>74.1</b>	<b>95.9</b>	<b>111.1</b>	<b>5.5</b>	<b>286.6</b>	<b>248.0</b>
Adjustment for prior years	(0.1)	(4.8)	5.5	(0.1)	0.5	(0.1)
<b>Income tax expense for continuing operations</b>	<b>74.0</b>	<b>91.1</b>	<b>116.6</b>	<b>5.4</b>	<b>287.1</b>	<b>247.9</b>
<b>Discontinued Operations<sup>8</sup></b>						
Profit/(loss) before tax					60.8	24.7
Income tax expense/(credit) for discontinued operations					<b>4.6</b>	<b>5.2</b>
<b>Total</b>						
Profit before tax					995.0	846.4
<b>Income tax expense</b>					<b>291.7</b>	<b>253.1</b>
Effective tax rate – Continuing Operations only	33.0%	34.9%	27.4%	23.5%	30.7%	30.2%
Effective tax rate – Including Discontinued Operations					29.3%	29.9%

<sup>6</sup> Restated for divestment of CHEP China.

<sup>7</sup> FY23 includes US\$16.7m (FY22: US\$2.1m) of BEAT in the US. For Brambles, this tax is almost entirely charged on intra-group royalties, management fees and interest payments which are treated as taxable income for Brambles companies in Australia and the UK. In previous periods BEAT was reduced by US tax losses.

<sup>8</sup> CHEP China has been recognised in discontinued operations following the completion of the merger with Loscam (Greater China) in March 2023. Prior year comparatives have been restated.

# Reconciliation of income tax expense to cash tax paid

## Brambles Limited Consolidated Group

	Australia 2023 US\$m	Americas 2023 US\$m	EMEA 2023 US\$m	Asia-Pacific 2023 US\$m	Total 2023 US\$m	Total 2022 US\$m
<b>Income tax expense for continuing operations</b>	<b>74.0</b>	<b>91.1</b>	<b>116.6</b>	<b>5.4</b>	<b>287.1</b>	<b>247.9</b>
Temporary differences						
On fixed assets	(5.5)	(34.3)	(31.3)	2.1	(69.0)	(90.5)
On revenue recognition	0.0	16.9	4.4	(0.2)	21.1	1.9
On leases	(0.4)	(0.4)	(0.1)	0.1	(0.8)	(4.0)
On tax losses	0.0	(20.8)	0.2	(2.8)	(23.4)	27.5
Other	(4.2)	19.4	3.3	(3.4)	15.1	(4.1)
<b>Gross tax payable</b>	<b>63.9</b>	<b>71.9</b>	<b>93.1</b>	<b>1.2</b>	<b>230.1</b>	<b>178.7</b>
Income taxes to be (paid)/refunded in later years	(34.3)	1.1	(15.0)	0.9	(47.3)	(32.7)
Income taxes paid/(refunded) for prior years	33.5	(4.1)	1.2	1.3	31.9	57.5
<b>Income taxes paid for continuing operations</b>	<b>63.1</b>	<b>68.9</b>	<b>79.3</b>	<b>3.4</b>	<b>214.7</b>	<b>203.5</b>
Income taxes paid/(refunded) for discontinued operations	0.0	0.0	0.0	0.0	0.0	0.0
<b>Income taxes paid on operating activities<sup>9</sup></b>	<b>63.1</b>	<b>68.9</b>	<b>79.3</b>	<b>3.4</b>	<b>214.7</b>	<b>203.5</b>

<sup>9</sup> Per Consolidated Cash Flow Statement in Brambles Annual Report.



# International related party dealings

Brambles Limited is the ultimate parent entity of the Brambles Group. It has its global headquarters in Sydney and an office in London. Brambles Limited is incorporated and resident for tax purposes in Australia.

Brambles has operations in approximately 60 countries and conducts business in foreign jurisdictions generally through locally incorporated legal entities and is subject to the tax regimes in those jurisdictions. Group subsidiaries are disclosed in Appendix 2 to this report.

In order to operate efficiently, various functions are centralised in Australia, the United States and the United Kingdom and cross charged to the business units. In addition, certain intellectual property is centrally held in Australia and the UK.

An overview of the key international related party dealings in the Year to 30 June 2023 is as follows:

Nature of the intercompany transactions	Transfer Pricing Policy
Provision of global management services and regional support services	Charges for these services are on a cost-plus basis and costs are allocated using an appropriate method of allocation
Licensing know-how and other intellectual property	Royalties determined on a comparable uncontrolled price method and supported by Advance Pricing Agreements (APAs). These APAs expired 30 June 2023. Renewal applications have been lodged with the ATO, HMRC and IRS
Provision of intercompany funding	Funding priced at a margin over the Group's external cost of funds
Provision of global IT services	Charges for these services are on a cost-plus basis and costs are allocated using an appropriate method of allocation
Provision of pallet and container rentals	Rental charges based on a return on assets

Brambles conducts international related party dealings on arm's length terms to meet the regulatory requirements of the relevant jurisdictions and in accordance with the OECD transfer pricing rules and guidelines. Where practicable we seek to obtain advance pricing agreements with the ATO and other taxation authorities for greater assurance. However, transfer pricing is a complex area and its application can be subject to differences in interpretation by different taxation authorities.

Brambles discloses its material intercompany transactions in its lodged tax returns and other disclosures to tax authorities, including the transfer pricing Master File drawn up in line with OECD requirements and lodged with the ATO. Brambles also complies with the Country-by-Country ("CbC") reporting requirements in each of the countries in which it operates. Brambles' CbC report for the Year to 30 June 2022 was lodged with the ATO in June 2023.

Local Transfer Pricing Files are lodged with tax authorities as prescribed by the laws of the particular country.

During financial year ended 30 June 2023, the Brambles Limited Australian Tax Consolidated Group provided the following ongoing services to overseas subsidiaries:

- Provision of know-how and other intellectual property (US\$140.9m)
- Provision of management and support services (US\$127.5m); and
- Provision of intercompany funding and treasury support services (US\$17.5m).

The following services were provided to the Brambles Limited Australian Tax Consolidated Group in the same period:

- Provision of management and support services (US\$133.1m);
- Provision of engineering and R&D contracted support services (US\$69.1m); and
- Provision of IT access and support (US\$10.6m).

Entities within the Brambles group provide intra-group administrative support, with corresponding charges both to and from Australia.

# ATO tax transparency disclosures

The Australian Taxation Office (ATO) publishes tax information for large taxpayers in accordance with the ATO's tax transparency measures. This recurring annual disclosure contains the total income, taxable income and income tax payable for all public Australian companies with income in excess of A\$100 million.

The following taxation information is disclosable by the ATO for the Brambles Limited Australian Tax Consolidated Group.

	2022 A\$'000	2021 A\$'000
Total income	1,101,100	2,357,710
Taxable income	283,016	319,304
Income tax payable	<b>70,686</b>	<b>82,591</b>

A reconciliation of these disclosures is provided below:

	2022 A\$'000	2022 A\$'000	2021 A\$'000	2021 A\$'000
<b>Total income</b>		<b>1,101,100</b>		<b>2,357,710</b>
Total expenses		(545,694)		(478,582)
Accounting profit		555,406		1,879,128
Tax adjustments				
Intra-group dividends received	(252,686)		(1,569,103)	
Non-deductible expenses	18,136		7,592	
Unrealised FX gain	(23,352)		(19,022)	
Net capital gains	-		13,990	
Other permanent differences	27,020		30,161	
Timing differences	(41,508)		(23,442)	
		(272,390)		(1,559,824)
<b>Taxable income</b>		<b>283,016</b>		<b>319,304</b>
Prima facie tax payable (at 30% tax rate)		84,905		95,791
Offsets for foreign withholding tax suffered at source		(14,219)		(13,200)
<b>Income tax payable</b>		<b>70,686</b>		<b>82,591</b>

## Basis of report preparation

### Tax contribution summary

Tax payments to revenue authorities reported in this section are presented on a cash paid basis.

This report includes tax amounts paid and received by controlled entities within the Brambles Group as at 30 June 2023. In accordance with OECD principles for Country-by-Country reporting, corporate income tax paid comprises the total amount of income tax actually paid during the year by all group entities in the relevant tax jurisdiction. This includes taxes paid by group entities to the tax jurisdiction in which they are registered and to all other tax jurisdictions. Tax paid for each group entity also includes withholding taxes paid by other entities (associated enterprises and independent enterprises) with respect to payments to the group entity. Thus, for example, tax withheld on intra-group royalty payments to Australia and the UK is reported within the corporate income tax paid amounts for Australia and the UK, and not for the jurisdictions in which the tax was withheld. FY22 comparator figures have been restated to reflect this basis of presentation.

Tax payments made by discontinued operations, such as the CHEP China business, are excluded from both 2023 and 2022 comparator figures.

All payments to tax authorities have been reported in US dollars, translated using the exchange rate prevailing at the time.

### Income taxes disclosed in 2023 Annual Report

The financial statement disclosures in this section are taken from the 2023 Annual Report, which was prepared under Australian Accounting Standards and complies with International Financial Reporting Standards ("IFRS").

Other financial information presented in this section has been sourced from workpapers used in the preparation of the 2023 Annual Report or from the Brambles Reporting and Consolidation System, which sources its information from each individual group entity's general ledger system.

### ATO tax transparency disclosures for 2022

ATO tax transparency disclosures reflect total income, taxable income and tax payable per the Brambles Limited Australian Tax Consolidated Group's tax return for the Year ended 30 June 2022. Monetary amounts reported in this section are denominated in Australian dollars.

# Appendix 1 – FY23 Country-by-Country tax contribution summary

Provided below is a summary of Brambles' total cash taxes paid to Australian and overseas tax authorities on a country-by-country basis for the financial year ended 30 June 2023.

Year ended 30 June 2023

	Corporate Income Tax US\$m	Employment taxes US\$m	Property/real estate taxes US\$m	Green taxes and other taxes US\$m	Total tax contribution US\$m
Argentina	4.9	0.4	0.2	–	5.5
Australia	63.1	5.1	3.1	–	71.3
Austria	1.2	0.2	–	–	1.4
Belgium	–	2.6	0.1	–	2.7
Botswana	0.6	–	–	–	0.6
Brazil	4.1	2.1	–	–	6.2
Bulgaria	–	–	–	–	–
Canada	13.4	4.1	2.2	–	19.7
Chile	4.7	0.1	–	–	4.8
Colombia	–	0.1	–	–	0.1
Costa Rica	0.1	–	–	–	0.1
Croatia	–	–	–	–	–
Czechia	0.6	1.3	–	–	1.9
Denmark	–	–	–	–	–
El Salvador	0.1	–	–	–	0.1
Estonia	–	–	–	–	–
Finland	0.2	–	–	–	0.2
France	0.7	4.9	0.1	1.0	6.7
Germany <sup>10</sup>	4.7	4.9	–	–	9.6
Greece	0.6	0.1	–	–	0.7
Guatemala	0.9	–	–	–	0.9
Honduras	–	–	–	–	–
Hungary	1.2	0.1	–	–	1.3
India	0.4	–	–	–	0.4
Ireland	–	0.3	–	–	0.3
Italy	8.4	1.4	–	0.1	9.9
Japan	0.5	–	–	–	0.5
Latvia	–	–	–	–	–
Lithuania	0.1	–	–	–	0.1
Malaysia	0.1	–	–	–	0.1
Mexico	19.5	2.3	–	–	21.8

<sup>10</sup> A further US\$3.0m of German Corporation Tax was paid by UK companies in their capacity as partners in Brambles Services GmbH & Co. KG.

## Appendix 1 – FY23 Country-by-Country tax contribution summary (continued)

	Corporate Income Tax US\$m	Employment taxes US\$m	Property/real estate taxes US\$m	Green taxes and other taxes US\$m	Total tax contribution US\$m
Morocco	–	–	–	–	–
Mozambique	–	–	–	–	–
Namibia	0.5	–	–	–	0.5
Netherlands	11.1	1.2	–	–	12.3
New Zealand	1.9	0.5	0.2	–	2.6
Nicaragua	0.2	–	–	–	0.2
Norway	0.6	–	–	–	0.6
Peru	0.3	–	–	–	0.3
Poland	2.2	0.9	–	–	3.1
Portugal	2.1	0.4	–	–	2.5
Romania	1.0	–	–	0.1	1.1
Russia	–	–	–	–	–
Saudi Arabia	0.2	0.2	–	0.1	0.5
Serbia	–	–	–	–	–
Singapore	–	–	–	–	–
Slovakia	0.5	0.1	–	–	0.6
Slovenia	0.1	–	–	–	0.1
South Africa	12.4	0.5	0.4	–	13.3
Spain	7.0	11.1	–	–	18.1
Swaziland	0.2	–	–	–	0.2
Sweden	–	0.4	–	–	0.4
Switzerland	0.4	0.1	–	–	0.5
Thailand	0.5	–	–	–	0.5
Türkiye	0.5	0.4	–	–	0.9
UAE	0.1	–	–	–	0.1
UK <sup>11</sup>	21.6	16.0	1.9	0.5	40.0
USA	20.7	23.1	27.4	3.1	74.3
Zambia	–	–	–	–	–
Zimbabwe	0.5	–	–	–	0.5
<b>Total</b>	<b>214.7</b>	<b>84.9</b>	<b>35.6</b>	<b>4.9</b>	<b>340.1</b>

This information has been prepared in accordance with the Basis of report preparation section on page 10 of this Report.

Income taxes withheld at source on intra-group payments are recognised as Corporate Income Tax paid in the source jurisdiction.

<sup>11</sup> Corporate Income Tax includes US\$3.0m of German Corporation Tax paid by UK companies in their capacity as partners in Brambles Services GmbH & Co. KG.

## Appendix 2 – Group entities

Provided below is a list of all registered entities in the Brambles Group as at 30 June 2023, together with country of registration.

Entity Name	Country of Registration
BIP Industries Limited	UK
Boxpal Limited	UK
Braecroft Timbers Pty Ltd	South Africa
Brambles (Asia) Pte Limited	Singapore
Brambles Business Services Mexico SRL de CV	Mexico
Brambles Business Services Spain SA	Spain
Brambles Canada Corp.	Canada
Brambles Custodians Pty Ltd	Australia
Brambles Employee Option Services Pty Ltd	Australia
Brambles Enterprises Limited	UK
Brambles Environmental Inc.	USA
Brambles Europe SA	Belgium
Brambles Finance Australia Pty Ltd	Australia
Brambles Finance Limited	Australia
Brambles Finance plc	UK
Brambles Holdings (UK) Limited	UK
Brambles Holdings International Pty Ltd	Australia
Brambles Industries Europe Inc.	USA
Brambles Industries Limited	Australia
Brambles Industries LLC	USA
Brambles International Finance BV	Netherlands
Brambles Investment Germany BV	Netherlands
Brambles Investment Limited	UK
Brambles Investments Europe BV	Netherlands
Brambles Limited	Australia
Brambles New Zealand Limited	New Zealand
Brambles Nominees Limited	UK
Brambles North America Inc.	USA
Brambles Overseas Investments Pty Ltd	Australia
Brambles Services GmbH & Co. KG <sup>12</sup>	Germany
Brambles Services Verwaltungs GmbH	Germany
Brambles Spain Pty Ltd	Australia
Brambles Superannuation Management (No2) Pty Ltd	Australia

<sup>12</sup> Registered partnership.

## Appendix 2 – Group companies (continued)

Entity Name	Country of Registration
Brambles Superannuation Management (No3) Pty Ltd	Australia
Brambles UK Limited	UK
Brambles USA Inc.	USA
Brambles Waste Services Inc.	USA
BXB Digital Limited	UK
BXB Digital Pty Ltd	Australia
CHEP (Malaysia) Sdn Bhd.	Malaysia
CHEP (Thailand) Ltd	Thailand
CHEP Argentina SA	Argentina
CHEP Australia Limited	Australia
CHEP Automotive SA de CV	Mexico
CHEP Benelux Nederland BV	Netherlands
CHEP Benelux NV	Belgium
CHEP Botswana Pty Ltd	Botswana
CHEP Bulgaria EOOD	Bulgaria
CHEP Canada Corp.	Canada
CHEP Chile SA	Chile
CHEP Colombia SAS	Colombia
CHEP Container and Pooling Solutions Inc.	USA
CHEP Costa Rica SA	Costa Rica
CHEP CZ s.r.o	Czechia
CHEP d.o.o.	Croatia
CHEP D.O.O. Beograd	Serbia
CHEP Deutschland GmbH	Germany
CHEP do Brasil Ltda	Brazil
CHEP El Salvador SA de CV	El Salvador
CHEP Equipment Pooling BV	Belgium
CHEP Equipment Pooling BV - branch	UK
CHEP España SA	Spain
CHEP España SA - branch	Portugal
CHEP Estonia OU	Estonia
CHEP Eswatini Pty Ltd	Eswatini
CHEP France Holding SA	France
CHEP France SA	France
CHEP Guatemala Limitada	Guatemala
CHEP Gulf General Trading LLC	UAE
CHEP Hellas EPE	Greece

## Appendix 2 – Group companies (continued)

Entity Name	Country of Registration
CHEP Honduras SA de CV	Honduras
CHEP India Private Ltd	India
CHEP International LLC	USA
CHEP Israel Ltd	Israel
CHEP Italia SRL	Italy
CHEP Japan Kabushiki Kaisha	Japan
CHEP Konteyner Ve Palet Ltd Sirketi	Türkiye
CHEP Logistika d.o.o.	Slovenia
CHEP Magyaroszag Szolgatato Kft	Hungary
CHEP Manufacturing and Equipment Private Ltd	India
CHEP Maroc Sarl	Morocco
CHEP Mexico SRL de CV	Mexico
CHEP Middle East FZCO	UAE
CHEP Middle East DMCC	UAE
CHEP Mozambique LDA	Mozambique
CHEP Namibia Pty Ltd	Namibia
CHEP Nicaragua SA	Nicaragua
CHEP Osterreich GmbH	Austria
CHEP Pallecon Solutions (Malaysia) Sdn. Bhd	Malaysia
CHEP Pallecon Solutions (Thailand) Ltd	Thailand
CHEP Pallecon Solutions BV	Netherlands
CHEP Pallecon Solutions Pty Ltd	Australia
CHEP Peru S.A.C.	Peru
CHEP Polska Sp. z o.o	Poland
CHEP Pooling Services Romania SRL	Romania
CHEP Rus LLC	Russia
CHEP Saudi Arabia Limited	Saudi Arabia
CHEP Scandinavia BV	Netherlands
CHEP Scandinavia BV - branch	Denmark
CHEP Scandinavia BV - branch	Norway
CHEP Scandinavia BV - branch	Finland
CHEP Scandinavia BV - branch	Sweden
CHEP Schweiz BV	Netherlands
CHEP Schweiz BV - branch	Switzerland
CHEP Services LLC	USA
CHEP Singapore Pte Ltd	Singapore
CHEP SK s.r.o.	Slovakia

## Appendix 2 – Group companies (continued)

Entity Name	Country of Registration
CHEP South Africa Pty Ltd	South Africa
CHEP South Africa Pty Ltd – branch	Zambia
CHEP South Africa Pty Ltd – branch	Zimbabwe
CHEP Taiwan Limited	Taiwan
CHEP Technology Pty Ltd	Australia
CHEP UK Limited	UK
CHEP UK Ltd - branch	Ireland
CHEP Uruguay SA	Uruguay
CHEP USA <sup>13</sup>	USA
CHEP USA - branch	Puerto Rico
Cyan Logistics Limited	UK
Drum Holding Company LLC	USA
Ensco Environmental Services of Georgia	USA
Environmental Systems Company	USA
Express Freight Pty Ltd	Australia
IFCO N.A. Finance LLC	USA
Pallets Sub, LLC	USA
Polybulk Limited	UK
Rail Car Services Limited	UK
SIA CHEP Latvia	Latvia
Texas Pallet de Mexico SA de CV	Mexico
Transpac Container Pooling Egypt SAE	Egypt
UAB CHEP Lithuania	Lithuania
Weatherboard Pty Ltd	South Africa
Wrekin Roadways Limited	UK

Brambles holds a 16% interest in MicroStar, a leading US beer keg solution provider, which is accounted for as an associate using the equity method. MicroStar companies are not included within this table as they are not under Brambles' control.

On 28 November 2022, Brambles entered into an agreement to combine the pallet and automotive pooling operations of CHEP China with Loscam (Greater China) Holdings Limited, with completion of the transaction taking place on 31 March 2023. As consideration Brambles received a 20% interest in the combined entity (Loscam China) which is accounted for as an associate using the equity method. Loscam China companies are not included within this table as they are not under Brambles' control.

<sup>13</sup> Registered partnership.

# Appendix 3 – Independent Auditor’s Review



## Independent Auditor’s Review Report to the Directors of Brambles Limited

### Conclusion

We have reviewed the summary of Brambles Limited’s total cash taxes paid to Australian and overseas tax authorities by region and country for the financial year ended 30 June 2023 as disclosed in the table on page 6 and in Appendix 1 of Brambles Limited’s FY23 Tax Transparency Report.

Based on our review, which is not an audit, nothing has come to our attention that causes us to believe that the summary of Brambles Limited’s total cash taxes paid to Australian and overseas tax authorities by geographic region for the financial year ended 30 June 2023 as disclosed in the table on page 6 and in Appendix 1 of Brambles Limited’s FY23 Tax Transparency Report is not prepared, in all material respects, in accordance with the Basis of Report Preparation.

### Emphasis of matter – basis of preparation and restriction on use

We draw attention to the Basis of Report Preparation on page 10 of Brambles Limited’s FY23 Tax Transparency Report (the Report) which describes the Basis of Preparation of the summary of Brambles Limited’s total cash taxes paid to Australian and overseas tax authorities by geographic region for the financial year ended 30 June 2023 (the Information Subject to Review). The Directors and management of the Company are responsible for determining the Basis of Report Preparation.

The Information Subject to Review is prepared by management to provide information to the Directors on Australian and International taxes paid, collected and remitted by Brambles Limited on its own behalf, for the year ended 30 June 2023. As a result, both the Information Subject to Review and this Auditor’s Report may not be suitable for another purpose.

Our report has been prepared for the Directors of the Company in accordance with our engagement letter and is intended solely for the Directors of the Company and should not be used by any other parties. We disclaim any assumption of responsibility for any reliance on this report, or on the Information Subject to Review to which it relates, to any other person other than the Directors of the Company, or for any purpose other than that for which it was prepared. Our opinion is not modified in respect of this matter.

### Management’s responsibility for the Information Subject to Review

Management are responsible for:

- preparing the Information Subject to Review in accordance with the Basis of Report Preparation including presenting the information fairly.

The Directors of the Company are responsible for:

- taking all reasonable steps to ensure that the Company maintains written financial records that correctly record and explain the Company’s transactions and financial position and performance with respect to the Information Subject to Review that enables the Tax Transparency Report to be prepared and reviewed



- taking all reasonable steps to ensure that the Company's financial records are correct and accurate by establishing and maintaining internal controls, including those for selecting and applying appropriate accounting policies, preventing and detecting fraud and error, establishing the Basis of Report Preparation, and determining that the Basis of Report Preparation is an acceptable basis for the preparation of the Information Subject to Review in the circumstances.

#### Auditor's responsibility for the review of the Information Subject to Review

Our responsibility is to express a conclusion on the Information Subject to Review in order to state whether, on the basis of the procedures described, we have become aware of anything that has come to our attention that causes us to believe that the Information Subject to Review has not been prepared, in all material respects, in accordance with the Basis of Report Preparation.

We conducted our review in accordance with *Standard on Review Engagements ASRE 2405 Review of Historical Information Other than a Financial Report* and other auditing standards applicable to a review engagement. A review of the Information Subject to Assurance consists of making inquiries, primarily of the persons responsible for financial and accounting matters, and applying analytical and other review procedures.

A review is substantially less in scope than an audit conducted in accordance with *Australian Auditing Standards* and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

ASRE 2405 requires us to comply with the independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants (including Independence Standards)* issued by the Accounting Professional and Ethical Standards Board.

A handwritten signature of the KPMG firm, written in blue ink.

KPMG

Sydney

9 October 2023

## Contact Information

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Email: [investorrelations@brambles.com](mailto:investorrelations@brambles.com)

### Share Registry

Access to shareholding information is available to investors through Boardroom Pty Limited

### Boardroom Pty Limited

GPO Box 3993, Sydney NSW 2001, Australia  
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+61 (0) 2 9290 9600 (from outside Australia)  
Facsimile: +61 (0) 2 9279 0664  
Email: [brambles@boardroomlimited.com.au](mailto:brambles@boardroomlimited.com.au)  
Website: [www.boardroomlimited.com.au](http://www.boardroomlimited.com.au)

### Share Rights Registry

Employees or former employees of Brambles who have queries about the following interests:  
Performance share rights under the performance share plans;  
Matching share rights under MyShare; or  
Shares acquired under MyShare or other share interests held through Certane SPV Management Pty Ltd, may contact Boardroom Pty Limited, whose contact details are set out above.

### American Depository Receipts Registry

Deutsche Bank Shareholder Services  
American Stock Transfer & Trust Company Operations Centre  
6201 15th Avenue Brooklyn NY 11219 USA  
Telephone: +1 866 706 0509 (toll free)  
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