Perpetual Limited
ABN 86 000 431 827
and its controlled entities

TAX REPORT

FOR THE YEAR ENDED
30 JUNE 2017

Perpetual

TABLE OF CONTENTS

1. INTRODUCTION

Perpetual has a strong commitment to the highest standards of corporate governance and transparency. This Tax Report highlights the tax payments made by Perpetual Limited (Perpetual or the Group) to the Australian (Federal and State) tax authorities during the year ended 30 June 2017 and provides information on its tax strategy and governance policy.

Perpetual's profits are predominantly generated from its Australian operations. Globally, Perpetual has operations in Singapore that are not material to the Group and have no other international related party dealings. The profits generated by Perpetual are taxed at the corporate income tax rate.

The net current income tax payable by Perpetual to the Australian Taxation Office (ATO) results in the generation of imputation credits, which are passed to shareholders through franked dividend payments. Where a shareholder is an Australian taxpayer, they are eligible to obtain a credit for the tax paid by Perpetual in the same financial year.

Perpetual is also subject to other direct and indirect tax obligations including goods and services tax ("GST"), fringe benefits tax ("FBT"), payroll tax, stamp duty and also pays 'pay as you go' (PAYG) withholding taxes on behalf of its employees.

This Tax Report builds upon the disclosures provided in the Tax Note published in Perpetual's 2017 Annual Report, which was prepared in accordance with Australian Accounting Standards and comply with International Financial Reporting Standards.

2. PERPETUAL GROUP

Perpetual is an Australian independent wealth manager operating in Australia and Singapore and provides asset management, financial advice and trustee services. In each of these businesses, Perpetual earns the majority of its revenue from fees charged on assets under management, advice or administration.

Revenue is influenced by movement in the underlying asset values, margin on assets and net client flows. The business model provides Perpetual with recurring revenue streams and leverage to movement in asset values. As Perpetual is a provider of high quality financial services, employment costs comprise the largest component of expenses.

Factors that affect the performance of the business include, amongst others, the performance of the global and Australian economies and financial markets, consumer and investor confidence and government policy.

Perpetual is comprised of the following three core businesses:

Perpetual Investments (PI)

PI is one of Australia's most highly regarded investment managers, offering a broad range of products for personal investment, superannuation and retirement savings. The business covers a range of asset classes, including Australian and global equities, fixed income and multi-asset strategies. It services a diverse range of client types, from large institutional investors through to smaller retail investors.

Perpetual Private (PP)

Perpetual Private provides a range of advice and trustee services for high net worth individuals in the target segments of 'business owners', 'established wealthy' and 'professionals'. It had $13.5 billion of Funds Under Advice (FUA) at the end of FY17.

Perpetual Private aims to be the leading provider of advice and wealth management for high net worth individuals, families, businesses and not-for-profit organisations. A key part of Perpetual Private is its philanthropic business and Perpetual is one of Australia's largest managers of philanthropic funds, with $2.7 billion in FUA for charitable trusts and endowment funds as at the end of FY17.

Other advisory services include strategic advice on superannuation, retirement planning, general investment, asset protection, insurance, tax management, estate planning, aged care, social security, succession planning, and accounting services..

Perpetual Corporate Trust (PCT)

Perpetual Corporate Trust is a leading provider of corporate trustee services. The business comprises the following:

- **Debt Markets Services –** provision of trustee, custody and standby services to the debt capital and securitisation markets, provision of specialised trust management and accounting services to the debt capital markets, and provision of data warehouse and investor reporting to the Australian securitisation market; and

- **Managed Funds Services –** operates in Australia and Singapore, providing outsourced responsible entity, trustee and custody services in a variety of asset classes including property, infrastructure, private equity, emerging markets and hedge funds.

Perpetual and its wholly owned Australian entities elected to form an income tax consolidated group as of 1 July 2002. As a consequence, all members of the tax consolidated group are taxed as a single entity and governed by a tax funding agreement.

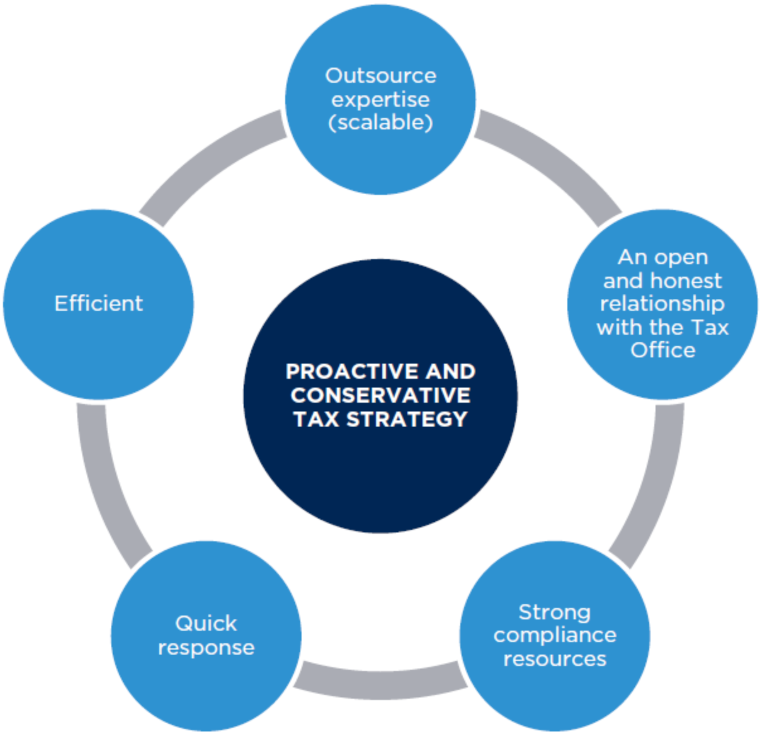
Under the agreement, all wholly owned Australian entities fully compensate Perpetual for any current income tax payable assumed and are compensated by Perpetual for any current tax receivable and deferred tax assets relating to unused tax losses or unused tax credits that are transferred to Perpetual under the income tax consolidation legislation. The funding amounts are determined by reference to the amounts recognised in the members' financial statements.

3. TAX STRATEGY AND GOVERNANCE

3.1 TAX STRATEGY

Perpetual's tax strategy is controlled and governed by the Perpetual Board of Directors through the Group's Tax Risk Management Framework (TRMF) with a focus on maintaining strong tax compliance disciplines across the Group while maximising shareholder's returns.

Perpetual's tax strategy within the TRMF is summarised in the diagram below.



Perpetual's TRMF is implemented based on a proactive and conservative approach to identifying key tax risks and applying appropriate courses of action to ensure that all tax risks are managed efficiently and effectively. The Group has a low risk tolerance and does not have an appetite for aggressive tax structures requiring significant investment in tax teams.

The tax teams are appropriately resourced by experienced tax personnel to ensure that day to day operational tax matters, minor tax planning and general tax queries can be addressed quickly. Significant one-off transactions are managed via external tax advisers when the tax risk has been identified as material and above the resource capacity of the tax teams.

Perpetual adopts a proactive and risk averse approach to taxation built upon transparency and pro-active engagement with the Australian Taxation Office (ATO). Over past years, the ATO has undertaken various tax reviews which have been completed in a cooperative and transparent manner. Throughout the review processes, Perpetual has provided all information requested and the ATO has not made any adjustments to submitted tax returns based on these reviews.

3.2 TAX GOVERNANCE

Perpetual manages its tax risk by monitoring the Board and senior managements' attitude, overall strategy and objectives for tax risk. This process is governed by the Board's Tax Corporate Governance Policy.

The Group's awareness and response to tax risk facing the organisation includes detailed processes and procedures for identifying and evaluating the risks. These preventative measures, incorporated in the Group tax risk register and tax risk management plan, are designed to mitigate and manage the tax risks identified.

Perpetual has a Risk Management Framework (RMF) with coordinated risk management activities and three lines of defence. The Tax Risk Framework is a supporting program of the RMF and uses its risk assessment tools, likelihood assessment and consequence assessment to identify and prioritise the tax risks, risk treatment and action plans.

4. TAXES PAID BY THE PERPETUAL GROUP

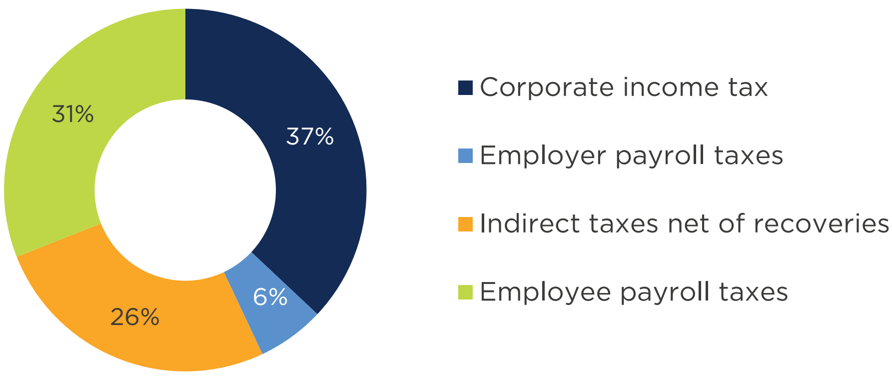
The table below illustrates the types of taxes paid by Perpetual to the Australian (Federal and State) tax authorities for the financial year ended 30 June 2017.

TAX AUTHORITIES	CORPORATE INCOME TAX [1]	EMPLOYER/ PAYROLL TAXES [2]	INDIRECT TAXES [3]	TOTAL TAXES PAID [4]	EMPLOYEE TAXES REMITTED [5]
	$M	$M	$M	$M	$M
Australian Federal taxes	60.1	0.5	41.2	101.8	51.8
Australian State taxes	-	9.1	-	9.1	-
TOTAL	**60.1**	**9.6**	**41.2**	**110.9**	**51.8**

Footnotes:

1) Income tax liabilities payable to the ATO by the Perpetual tax consolidated group in Australia.
2) Australian Federal based employer tax comprises Fringe Benefit Tax (FBT) levies on non-cash benefits to employees and associates for the year ended 31 March 2017; Australian State based payroll tax is imposed on employers whose 'taxable wages' exceed a certain level for the year ended 30 June 2017.
3) Comprises Goods and Services Tax (GST) for Perpetual GST consolidated group entities net of recoveries.
4) The total tax payable in Singapore is not material to the consolidated entity and has no material impact on the taxes paid report above. There are no material intercompany dealings between Singapore and Australia. Any intercompany transactions incurred between the Singapore subsidiary and Perpetual are dealt with at arm's length from a transfer pricing perspective and comply with Australian International Tax Law.
5) Employee taxes withheld from employee remuneration and remitted to tax authorities for the year ended 30 June 2017.

TAXES PAID IN 2017



5. INCOME TAX REPORT

Perpetual reported an income tax expense (ITE) of $52.0 million in the 2017 financial year and $51.3 million in the 2016 financial year. The reported statutory effective tax rate (ETR) of 27.5% in 2017 and 28% in 2016, constitutes the ITE as a percentage of Perpetual's total profit before tax. The primary drivers of the ITE and ETR are as follows:

	2017 $'000	**2016 $'000**
Current tax expense		
Current year tax expense	62,058	55,392
Adjustment for prior years	(702)	(450)
Research and development tax incentives from prior years	(359)	(1,061)
Total current tax expense impacting income taxes payable	60,997	53,881
Deferred tax expense		
Temporary differences	(8,948)	(2,574)
Total income tax expenses	52,049	51,307
Profit before tax for the year	189,342	183,312
Prima facie income tax expense calculated at 30% (2016: 30%) on profit for the year	56,803	54,994
- Accounting gains on disposal of investments and businesses	(1,957)	(689)
- Accounting impairment on assets	(52)	57
- Recognition of previously unrecognised capital and revenue losses	(905)	(317)
- Prior period adjustments	(1,061)	(1,511)
- Other non-assessable income and tax credits	(1,218)	(1,570)
- Other non-deductible expenses	440	343
Total	52,049	51,307
Income taxes payable at the beginning of the year	21,863	27,491
Income taxes payable for the financial year	60,997	53,881
Less: reclassification to deferred tax liabilities	-	(4,594)
Less: tax paid during the year	(60,132)	(54,951)
Add/Less: other adjustments	(83)	36
Income taxes payable as at 30 June	22,645	21,863
Represented in the Statement of Financial Position by:		
Current tax liabilities	22,645	21,863
Effective tax rate (ETR)	27.5%	28.0%

Bases of calculation of ETR

Perpetual's ETR is calculated by dividing the total income tax expense by the profit before tax for the year.

The consolidated entity operates in Australia and Singapore. The Singapore operation is not material to the consolidated entity and has no material impact on the calculation of the ETR.

Explanation of variance to the legislated 30% tax rate

The consolidated entity's effective tax rate compared to the legislated 30% is mainly attributed to the utilisation of previously unrecognised capital losses to offset realised capital gains, the recognition of revenue losses in Singapore and prior year adjustments primarily relating to the Research and Development tax incentive claimed.

Capital losses calculated at 30% tax in Australia

The total tax benefit of realised capital losses is $31,071,000 (30 June 2016: $32,336,000), comprising $3,000,000 (30 June 2016: $2,709,000) recognised in deferred tax assets and $28,071,000 (30 June 2016: $29,627,000) not recognised in deferred tax assets. These are net of realised tax capital gains and losses incurred in the current and/or prior year and are available to be utilised by the Australian income tax consolidated group in future years.

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Angel Place
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Adelaide SA 5000

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