Tax Transparency Code. 2024

Resimac Group Ltd

ACN 095 034 003



About Resimac.

Resimac Group Ltd ('Resimac Group') is a leading nonbank leader and multi-channel distribution business. Its fully integrated business model comprises originating, servicing and funding prime, nonconforming residential mortgage and asset finance products in Australia and New Zealand.

The Resimac Group has a proven track record of growth and stability which dates to 1985 when operations commenced. Today, the Group is proud to have serviced over 55,000 customers with a portfolio of home loans on balance sheet of \$13 billion, an asset finance portfolio of over \$1 billion, and total Assets Under Management (AUM) of over \$14 billion.

As a pioneer of the Residential Mortgage-Backed Securities ('RMBS') industry, the Group has one of Australia's most respected securitisation programs, having issued in excess of \$45 billion in domestic and global markets since 1987. The Resimac Group has access to a diversified funding platform with multiple warehouse lines provided by domestic and offshore banks for short-term funding in addition to a global securitisation program to fund its assets longer term.

Thanks to our flexible global capital markets programme, we provide solutions to a wide range

of customers including the self-employed and contractors, as well as customers with previous credit impairments through a network of over 12,000 broker partners.

Resimac Group is a profitable organisation with a diverse income stream – net interest margin on principally funded loans, annuity trail income on non-principally funded loans and other fee income. We operate a proprietary servicing platform and hold a Standard & Poor's ('S&P') "Strong" Servicer Ranking, which was reaffirmed in September 2024.

Resimac values the benefit of tax transparency practices. We have voluntarily adopted the Tax Transparency Code and will strive to further strengthen our tax risk management and governance over time. Our tax approach is governed by Resimac's commitment to best-practice corporate governance, transparency and accountability. This is essential for the long-term performance and sustainability of the business, and to protect and enhance the interest of shareholders and other stakeholders. Resimac recognises the value its investors place in its compliance with tax laws and the benefits of having tax practices integrated with Resimac's Environmental, Social and Governance Policy.

Chief Financial Officer's statement

Resimac Group is pleased to make public disclosure in this report of its tax affairs in Australia and New Zealand. The Tax Transparency Code report provides Resimac with the opportunity to assist stakeholders in understanding our compliance with Australian and international tax laws and demonstrate fulfilment of our tax obligations.

Resimac is proud of its robust approach to tax governance and managing tax risks. During the 2024 financial year, Resimac Group made a total tax contribution of \$22 million, with a global effective tax rate of 30.6%.

Resimac's tax strategy.

Resimac Group manages its tax framework and strategy in accordance with the Group's Board Tax Policy and Tax Risk Management strategy ('Tax Policy') in Australia and New Zealand. Resimac's tax strategy is focused on compliance, integrity and maximising shareholder value. The Tax Policy outlines the appropriate course of action required to ensure that all tax risks are managed appropriately, and is updated and approved by the Group's Board Audit Committee ('BAC') annually.

1. Board tax policy

The Resimac Board sets out the risk appetite of the Group as follows:

- No transactions should be undertaken solely for tax reasons;
- Reputational considerations must be taken into account when determining whether to enter into a transaction;
- The Group tolerates a low risk of errors in tax financial controls and reporting;
- The Group intends to comply with all tax-related matters across all jurisdictions that it operates in; and
- The Group will not take a tax position that is not "reasonably arguable".

2. Tax risk management framework

Resimac's tax strategy is implemented through a tax risk management framework that ensures

transparency and accountability. Key objectives include:

- Only enter transactions that have a clear business rationale before taking into account any tax consequences; and
- Does not undertake in aggressive tax planning or tax avoidance arrangement.

Resimac's tax risk management framework is supported by:

- Tax updates and tax risk issues are reported to the Group Board Audit Committee as they arise;
- Engagement with external advisers where appropriate to ensure that complex tax issues are proactively managed;
- Tax provisioning, including material positions taken, are subject to external audit review on a biannual basis; and
- Investment in technology to ensure a high level of integrity and efficiency in Resimac's tax reporting.

Relationship with tax authorities

Resimac maintains open, honest, and co-operative relationships with all tax authorities, which include:

- Providing information required on a timely basis;
- · Address all enquiries from the tax authorities promptly, transparently and with full disclosure of relevant facts;
- Engaging proactively on significant tax issues.

Resimac have no tax disputes with the Australian Taxation Office (ATO). Resimac is undergoing a GST review by the ATO and is dedicated to providing all relevant information promptly and accurately. Resimac undertakes regular self-assessment activities to ensure it meets the ATO's standards for corporate tax governance.

International related party dealings.

Resimac's businesses in Australia and New Zealand routinely deal with each other when it is in the best interests of Resimac to do so. These related party dealings do not have a material impact on Resimac's taxable income.

A comprehensive analysis of each related party transaction is undertaken to ensure they are conducted on terms, including pricing, which are consistent with Australian transfer pricing laws and the OECD guidelines.

	Why it is in best interests of Resimac				
International related party dealings					
Provision of management services, allocation of software costs	A number of shared service functions are performed centrally by Resimac's Australian business, for the benefit of both Australia and New Zealand.				
Insurance	Bermuda based captive insurer provides tailored corporate insurance to Resimac's Australia and New Zealand business.				
Loans	Resimac's Australia business has financing-related activities, including amounts loaned to New Zealand subsidiaries and to other related parties on an ad hoc basis. Resimac receives interest income on the amount loaned in accordance with arm's length principals.				

Tax disclosures.

The table below outlines the relationship between accounting profit and income tax expense and reconciles the latter to Resimac's income tax payable. This data can be cross referenced to the Resimac Group Ltd 2024 Annual Report.

	FY24	FY23
Reconciliation of accounting profit to income tax expense	\$'000	\$'000
Profit/(Loss) from ordinary activities	50,111	95,385
Income Tax Expense at 30% tax rate	15,033	28,616
Permanent Differences explained by	158	235
Not deductible expenses	233	110
Effect of offshore tax rates of subsidiaries operating in non-Australian jurisdictions	111	122
Share based payments	(44)	63
Other items	(142)	(60)
Current Year Income Tax Expense	15,191	28,851
Less: adjustments related to deferred/current tax of prior years	129	75
Income tax expense recognised in profit or loss	15,320	28,926
EFFECTIVE TAX RATE (ETR) ¹	30.6%	30.3%

Effective Tax Rate (per Financial Statements)	Profit before income tax	Income tax expense	Effective income tax rate	
Jurisdiction:	\$'000	\$'000	\$'000	
Australia	52,678	16,003	30.4%	
New Zealand	(2,418)	(683)	28.2%	
Bermuda ²	(149)	0	0.0%	
TOTAL	50,111	15,320	30.6%	

 $^{1\,}$ The disclosed effective tax rate was calculated in accordance with AASB 112.

² Due to materiality, within the Resimac Group Annual Report the Bermuda-based captive insurance company is reported in aggregate under the Australian Lending segment.

Income taxes paid for continuing operations

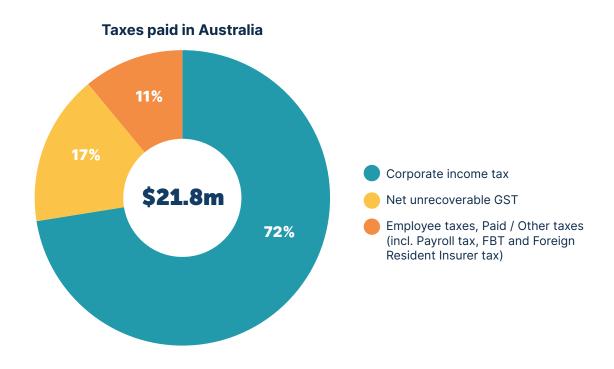
15,762

43,482

Tax contribution summary.

Total taxes paid by the Group in 2024 financial year were:

	FY24 AUD (\$m)		FY23 AUD (\$m)			
Tax contribution by the Resimac Group	AU	NZ	TOTAL	AU	NZ	TOTAL
Corporate income tax	15.8	-	15.8	40.0	3.5	43.5
Net unrecoverable GST	3.6	0.2	3.8	3.2	0.2	3.4
Employee taxes paid / Other taxes (incl. Payroll tax, FBT and Foreign Resident Insurer tax)	2.4	-	2.4	2.3	-	2.3
TOTAL	21.8	0.2	22.0	45.5	3.7	49.2



ATO corporate tax transparency reports.

The ATO publish tax information of large Australian taxpayers which includes Resimac. Information published about Resimac is based on Resimac's Australian tax consolidated group income tax return.

The information below have been prepared to provide a greater understanding of how the ATO's public disclosures reconcile to the income tax paid and income tax payable disclosures in this report.

Table 1 - Reconciliation of profit

The Resimac Tax Consolidated Group ('TCG') comprises of wholly owned Australian entities does not include Resimac's New Zealand entities nor some of its investment trusts.

	FY24	FY23	FY22
	\$'000	\$'000	\$'000
Resimac Group profit before per Financial Statements	50,111	95,385	143,460
Loss/(Profit) from Resimac Group entities outside the Resimac TCG	7,408	3,809	(36,476)
Profit before tax for Resimac TCG's income tax return	57,519	99,194	106,984

Table 2 - Summary of income tax return

	FY24	FY23	FY22
Resimac TCG	\$'000	\$'000	\$'000
Total Income (refer to Table 3)	270,307	283,726	275,084
Total Expenses	212,788	184,532	168,100
Net Profit before tax (refer to Table 1)	57,519	99,194	106,984
Permanent differences	2,024	455	(1,083)
Temporary differences	(4,741)	8,019	8,876
Taxable Income (refer to Table 3)	54,802	107,668	114,777
Tax on taxable income at 30%	16,441	32,300	34,433
Franking and other offsets	(900)	(1,602)	(219)
Tax Payable (refer to Table 3)	15,541	30,698	34,214

Table 3 - ATOs published disclosure for the Resimac TCG

The following information will be disclosed by the ATO in respect of the Australian Tax Consolidated Group:

	30 June 2024 (AUD \$)	30 June 2023 (AUD \$)	30 June 2022 (AUD \$)
Resimac TCG			
Total income	270,307,216	283,726,309	275,084,003
Taxable income	54,802,313	107,668,628	114,777,420
Tax payable	15,540,942	30,698,390	34,214,235

The tax payable above relates to income tax payable by the Resimac Tax Consolidated Group, which does not include tax payable for foreign entities and Australian entities that are not wholly owned.

Basis of preparation

The Tax Transparency Report has been prepared in accordance with the Australian Board of Taxation Tax Transparency Code guidelines and Australian Accounting Standards Board's 'Draft Appendix to the Tax Transparency Code'. The information is based on the income tax disclosures contained in Resimac's audited 2024 Annual Report.

Amounts disclosed in this report are in Australian dollars, which is the Group's functional currency. Amounts disclosed in the report is sourced from the Resimac Group Annual Report, submitted tax returns and financial records.

RESIMAC GROUP LTD TAX TRANSPARENCY CODE 2024

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