

INPEX



INPEX Australia

2023 Tax transparency report



Our company has been a proud member of the Australian business community since 1986. INPEX CORPORATION, our parent company, is listed on the Tokyo Stock Exchange and is 22.18 per cent owned by the Japanese Government.

We are committed to responsibly managing our business activities in all countries in which we operate. We uphold a high standard of transparency, and are pleased to be a signatory to the Australian Government's *Tax Transparency Code*.

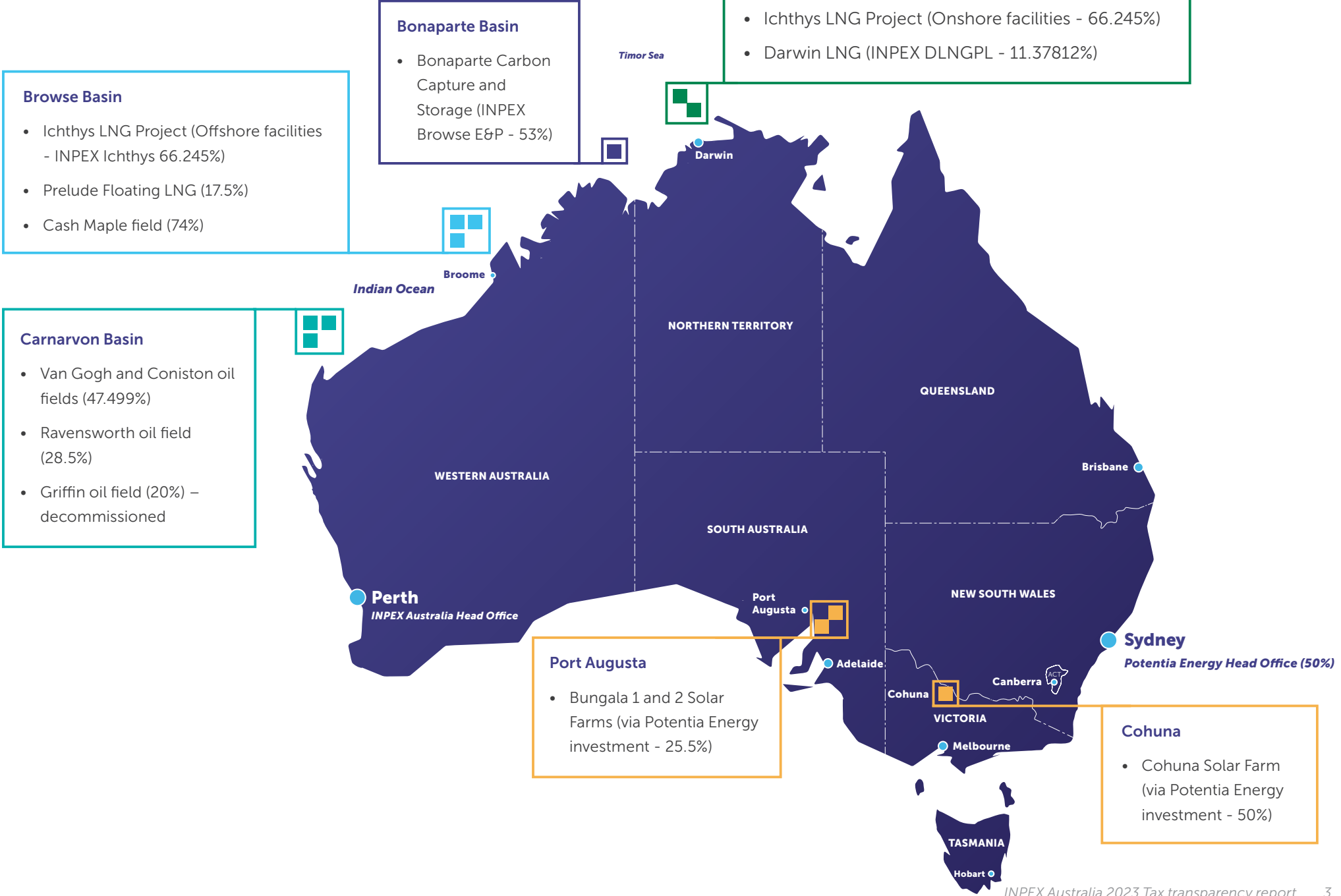
We believe tax transparency strengthens trust and accountability between industry, government and communities, while enhancing the investment environment by encouraging good business practice.

We invite you to review our seventh annual tax transparency report which sets out our tax compliance and highlights our broader social and economic contribution in Australia.

村山 敏博

Tetsu Murayama
Managing Director, Country Chair Australia
April 2025

INPEX in Australia



International related party dealings

All international dealings by INPEX are conducted in accordance with Australian and international tax law, and in keeping with the arm’s length principle recommended by the Organisation for Economic Co-operation and Development (OECD).

INPEX follows global taxation trends and endeavours to respond to new developments. In particular, INPEX will monitor developments in legislation governing international transactions in Japan and other G20 countries based on the report of the OECD/G20 Base Erosion and Profit Shifting Project, which aims to prevent multinational enterprises from exploiting gaps and loopholes in tax rules to shift profits to low or no tax locations.

INPEX’s head office is in Tokyo, and its Australian companies draw on INPEX’s global pool of resources.

Business Services

INPEX companies in Australia draw on technical and general administrative services in Japan to assist local operations. This maintains consistency across INPEX’s global operations.

Financing

INPEX has a treasury company based in Singapore that manages all intragroup cash and funding needs and provides the risk management associated with running multiple currencies across the globe.

Trading

INPEX has one trading company in Japan and one in Singapore that INPEX Ichthys and INPEX Alpha, Ltd use to sell product to end customers. These trading companies manage the interface and marketing arrangements.

Transfers within Integrated Projects

INPEX Ichthys sells feed gas from the Ichthys gas condensate field to Ichthys LNG under a pricing formula based on the OECD residual profit sharing transfer pricing methodology.

INPEX DLNGPL receives a share of a gas pipeline tariff from INPEX Sahul, Ltd (INPEX’s upstream participant on the Bayu-Undan project) for the use of the gas pipeline.

INPEX companies in Australia

INPEX has twelve Australian-based entities and two branches of Japanese companies. These companies are all governed in accordance with the corporations laws of Australia and Japan. They are 100 per cent owned and controlled by INPEX. In 2023, INPEX held a share of 66.245 per cent in Ichthys LNG Pty Ltd, which is an incorporated joint venture company. This company processes the feed gas sold to it by the Ichthys Upstream Joint Venture Participants. Ichthys LNG Pty Ltd is not covered in this report. In 2023, INPEX acquired a 50% interest in the Enel Green Power Australia (EGPA) (now Potentia Energy) renewable platform. The EGPA platform is not covered in this report and the entities held by the EGPA platform have not been included in the table below.

	<i>Company/branch name</i>	<i>Australian head company</i>	<i>Japanese head company</i>	<i>Ultimate beneficial owner</i>	<i>Participating interest in project name/function</i>
Multiple Entry Consolidated (MEC) Group	INPEX Holdings Australia Pty Ltd (IHAPL)		INPEX Browse, Ltd	INPEX CORPORATION	Holding company
	INPEX Browse E&P Pty Ltd (IBEPL)		INPEX Browse, Ltd	INPEX CORPORATION	Exploration permits (petroleum and carbon capture and storage)
	INPEX Ichthys Pty Ltd (IIPL)	INPEX Holdings Australia Pty Ltd (IHAPL)	INPEX Browse, Ltd	INPEX CORPORATION	Ichthys upstream project
	INPEX Oil & Gas Australia Pty Ltd (IOGA)	INPEX Oil & Gas Australia Pty Ltd (IOGA)	INPEX CORPORATION	INPEX CORPORATION	Prelude Floating LNG
	INPEX New Energy Business Australia Pty Ltd (NEBA)	INPEX Australia Mirai Energies Pty Ltd (IAME)	INPEX CORPORATION	INPEX CORPORATION	Renewable investment company
	INPEX Operations Australia Pty Ltd (IOAPL)	INPEX Holdings Australia Pty Ltd (IHAPL)	INPEX Browse, Ltd	INPEX CORPORATION	Operating company
	INPEX Australia Mirai Energies Pty Ltd (IAME)		INPEX CORPORATION	INPEX CORPORATION	Holding company
	INPEX Renewable Energy Australia Pty Ltd (IREA)	INPEX Australia Mirai Energies Pty Ltd (IAME)	INPEX CORPORATION	INPEX CORPORATION	Enel Green Power Australia (EGPA) platform
	INPEX Cash Maple Pty Ltd (ICM)	INPEX Australia Mirai Energies Pty Ltd (IAME)	INPEX CORPORATION	INPEX CORPORATION	Cash-Maple fields
	INPEX Australia Financial Services Pty Ltd (IAFS)	INPEX Australia Mirai Energies Pty Ltd (IAME)	INPEX CORPORATION	INPEX CORPORATION	Australian financial services entity
Branch of Japanese entity	INPEX Australia Pty Ltd (IAPL)		INPEX CORPORATION	INPEX CORPORATION	Australian payroll company
	INPEX DLNGPL Pty Ltd (IDLNGPL)		INPEX CORPORATION	INPEX CORPORATION	Darwin LNG
	INPEX Browse, Ltd (IBL)		INPEX CORPORATION	INPEX CORPORATION	Holding company
	INPEX Alpha, Ltd (Alpha)		INPEX CORPORATION	INPEX CORPORATION	Griffin Ravensworth Van Gogh Coniston



Taxation governance and standards

All INPEX companies and branch entities operating in Australia are compliant with Australian tax law. INPEX companies that operate in Australia either pay income tax now, or will pay income tax once major development projects move into the production phase. Other employment and transactional taxes will remain payable throughout the operational life of development projects.

The boards of directors for INPEX companies that operate in Australia are responsible for maintaining a system of risk management, governance and controls across all business operations, including the approach to tax, supported by executive management.

The directors and executive management of INPEX acknowledge that tax is one of our important social responsibilities for the contribution this makes to the social and economic development of the countries and regions in which we operate. INPEX meets this responsibility by ensuring the proper payment of tax in accordance with the applicable laws and regulations and conducting our tax affairs in a transparent manner. The INPEX *Global Taxation Policy*, which dictates the direction and resources for INPEX entities globally, reflects our socially responsible approach. A copy of the global tax policy can be found at <https://www.inpex.co.jp/english/csr/governance/tax.html>.

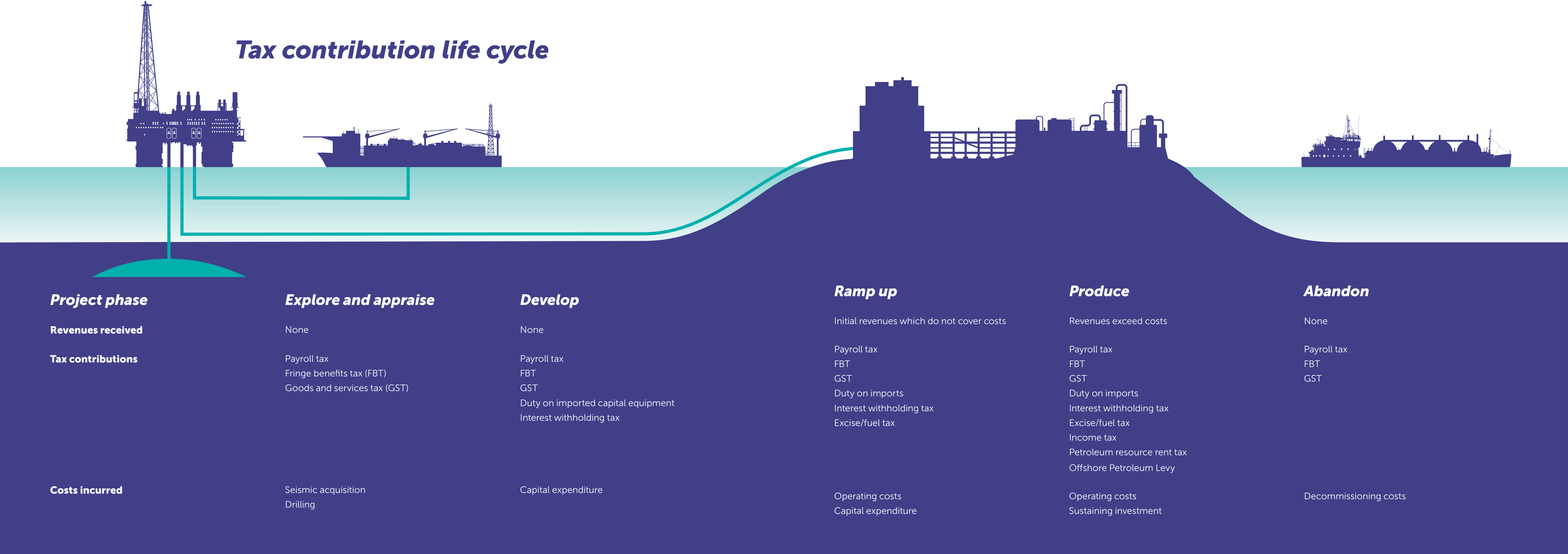
In addition to the *Global Taxation Policy*, INPEX companies that operate in Australia also follow the Company's *Tax Standard* which sets out the approach to tax risk management, compliance processes, as well as engagement with the ATO and other revenue agencies.

INPEX periodically draws on its internal audit and risk functions to test compliance with the *Tax Standard*, and to continuously improve reporting on processes and governance matters. Significant matters relating to taxation affairs are also audited by external auditors. Global taxation governance of INPEX ensures material companies are subject to Japan's Sarbanes-Oxley *Financial Instruments and Exchange Act 2006*, in addition to the laws of the countries in which the companies are based.

INPEX's *Code of Conduct* stipulates that the company must build sound and appropriate relationships with government and administrative authorities. INPEX is in regular communication with the ATO and responds in a cooperative and timely way to information requests. INPEX aims for certainty on material tax positions it adopts. INPEX engages with the ATO when matters are significant, complex or uncertain.

INPEX provides workforce education and training to actively promote tax compliance of its people, as required by their roles.

Tax contribution life cycle



Investing in renewable energy

In 2023, INPEX purchased a 50 per cent share of Enel Green Power Australia (EGPA), a subsidiary of Italian utility company Enel S.p.A. This acquisition was a significant milestone in INPEX’s energy diversification in Australia.

EGPA is engaged in a high-quality portfolio of renewable energy assets with varying levels of maturity across wind, solar and storage technologies across Australia, as well as expanding retail and trading. INPEX plays an active role in overseeing the management of EGPA’s renewable energy assets and supporting business development as it seeks to enhance the company’s portfolio.

In December 2024, EGPA announced its rebrand to Potentia Energy, setting out new identity and vision. You can read the media release [here](#).



Global transparency and sustainability initiatives

INPEX is committed to achieving Sustainable Development Goals through its business activities and works within international frameworks to strengthen the social and economic benefits of its operations.

Since October 2012, INPEX has been a part of the Extractive Industries Transparency Initiative (EITI), working closely with governments, companies and civil society to promote transparency. EITI monitors and reconciles the payments made by companies to government and government to communities.

Through EITI, INPEX is helping improve governance, reduce corruption and promote economic growth through stronger accountability and transparency.

INPEX supports global standards relating to human rights, such as the International Bill of Human Rights, the International Labor Standards of the International Labor Organization and the UN Guiding Principles on Business and Human Rights. In 2011, INPEX adopted the Ten Principles of the UN Global Compact, including areas relating to labour, environment and anticorruption

To comply with the *United Kingdom Modern Slavery Act 2015*, since 2016 INPEX Corporation has annually released a statement on its website to disclose the policies, systems and measures that we have in place to prevent slave labor and human trafficking within the Company and throughout the supply chain.

Further, since 2021, INPEX has issued annual Modern Slavery Statements in compliance with the *Australian Modern Slavery Act 2018* in respect of the activities of its Australian subsidiaries.

INPEX is an active member of IPIECA, the global oil and gas industry association for environmental and social issues.

For more information on INPEX’s global social and economic benefits and the projected contribution of Ichthys LNG to Australia’s economy, please visit the INPEX Australia website at <https://www.inpex.com.au/news-and-updates/publications/>



Reconciliation and effective tax rates for the year

(ended 31 December 2023) (in millions)

Table 2: Accounting income per financial statements and replica of tax note from respective financial statements

Item	*IHAPL (\$USD)	**IAME (\$USD)	IOGA (\$USD)	IBEPL (\$USD)	IAPL (\$AUD)	IDLNGPL (\$USD)
Total income	4,384	1	281	3	511	5
Accounting Profit/(Loss) before taxation	2,158	-3	-558	-107	1	3
Prima facie tax at 30% Australian tax rate	-647	1	167	32	-0	-1
Material Permanent Differences:						
- Prior Year under/over	1	-	1	0	-0	-0
- De-recognition DTAs	15	-	-16	-	-	-2
- Non-taxable income	64	0	1	-	-0	-
- Non-deductible expenses	-3	-1	-0	-8	-	-0
Total income tax benefit/(expense) per accounts	-570	0	154	24	-1	-3
Effective tax rate	26%	-	-	-	51%	109%

*Denotes the IHAPL accounting group which is IHAPL, IIPL and IOAPL only.
**Denotes the IAME accounting group which is IAME, IREA, INEBA, ICM and IAFS.

Table 2 reconciles accounting profit to income tax expense (accounting). All financial statements for INPEX’s Australian companies and branches of Japanese companies are lodged with the Australian Securities and Investments Commission (ASIC). For the branch entities, Australian tax effect accounting is not required and instead tax effect accounting is applied under tax regimes in Japan and Australia in accordance with Japanese Generally Accepted Accounting Principles.

The effective tax rates disclosed in Table 2 are calculated by dividing the relevant company’s income tax expense by their accounting profit before taxation. IAPL and IDLNGPL’s high effective tax rates are a consequence of the permanent adjustments related to employee benefits (motor vehicle leases) and the derecognition of deferred taxes on rehabilitation respectively.

INPEX has a prima facie effective tax rate of 73.5 per cent globally. The Japanese statutory tax rate is 28 per cent. For more information on INPEX’s global taxation please see note 17 on page 42 in the INPEX Consolidated Financial Statements for the year ended December 31, 2023 at https://www.inpex.com/assets/documents/english/ir/library/securities/securities20240628_en.pdf

Australian tax contribution summary

Table 3: INPEX Australian Group taxes paid 2011 to 2023 (\$A Million)

Tax Payment	2011 - 2022	2023	Total
Income Tax	739	451	1,190
Fringe Benefits Tax	104	12	116
Royalties	-	-	-
Excise	-	-	-
Payroll Tax	173	27	200
Interest Withholding Tax	332	60	392
Stamp Duty	89	2	91
Foreign Resident Withholding Tax	-	0	0
Offshore Petroleum Levy	44	37	80
GST - Denied Input Tax Credits	-	-	-
Total contributions	1,481	589	2,069

Australian income tax return disclosures for the year

(ended 31 December 2023) (in millions)

Table 4: Australian company accounting profit to tax payable reconciliation

Particulars	MEC (\$AUD)	IAPL (\$AUD)	IDLNGPL (\$AUD)
Total income as per tax return	9,315	511	8
Tax return profit/ (loss) before adjustments	1,962	1	5
Material adjustments			
Permanent:			
- Equity accounted (profit)/losses - (not assessable)/not deductible	-301	-	0
- Assessable Trust Distributions	0	-	-
- Other permanent difference	45	0	-
Temporary:			
- Timing adjustments related to assets	957	-	-0
- Borrowing costs	-1,145	-	-1
- Tax losses utilised	-597	-	-
- Adjustments related to restoration - restoration amounts become deductible once paid for tax purposes	61	-	-
- Sundry differences	448	-1	-0
- Research and development concession - temporary	12	-	-
- Employee provisions	-	9	-
Taxable income/(loss)	1,442	9	4
Tax payable (at 30%)	433	3	1
Tax credits utilised	-93	-0	-1
Income tax paid	340	3	1
2023 Tax losses carried forward	-	-	-
2022 Tax losses carried forward	994	-	-

Table 4 reconciles accounting profit to taxable income to tax paid based on lodged tax returns with the ATO. The total income, taxable income and tax payable for IHAPL, IAPL and Alpha will be formally released by the Commissioner of Taxation, as these entities all have total income in excess of AU\$100 million for the income year ended 31 December 2023.

^ The MEC group operates as a USD functional currency entity, but the tax return must disclose in AUD. The foreign exchange (FX) rate movement for tax return disclosure purposes accounts for part of why the tax loss movement does not directly correspond with the tax losses utilised in the 2023 income year (AUD-USD exchange rates 2023: 0.6645 and 2022: 0.7517). Other adjustments to fixed assets depreciation calculations were also made during the year which is the remaining difference between the loss utilised in 2023 and the 2022 carry forward loss disclosed. The MEC Group has now utilised all of its carried forward tax losses during the 2023 income year and is therefore expected to be tax payable going foreword.

Australian income tax return disclosures for the year cont.

(ended 31 December 2023) (in millions)

Tax effect accounting for INPEX branch entities is not performed in Australia, however, INPEX has summarised the branch contributions (in millions) to the lodged tax returns as follows:

Particulars	\$AUD
Total income as per the tax return	278
Tax return profit/(loss) before adjustments	-361
Taxable income/(loss)	46
Tax payable (at 30%)	14
2023 combined tax losses carried forward	95
2022 combined tax losses carried forward	90



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