



Connecting you to the topical tax issues

Tax Alert

August 2019

Updating a PIR and (further) KiwiSaver changes

By James Arbuthnott

Another round of proposed tweaks for KiwiSaver and PIRs was announced in late June. The changes are generally investor friendly, broadly to recognise that technology (including Inland Revenue's systems) has advanced since KiwiSaver was introduced in 2007, and use the information available from payday filing. The proposals are intended to make the administration of KiwiSaver more efficient, and they reflect the fact that technology means some things should simply be done more quickly than the current rules require.

PIR updates

There has been plenty of recent discussion about PIE and KiwiSaver investors using the wrong prescribed investor rates (PIR). One issue for investors is that if the rate applied is too high (including a 28% default rate), the 'overpaid' tax is not refunded. Pleasingly, it is now proposed that, in addition to being able to tell a PIE to update an investor's rate where they have selected the wrong one, the Commissioner can tell a PIE to update the rate if the investor is on the default rate. A good use of the data Inland Revenue now has more ready access to.

In this issue:

Updating a PIR and (further)
KiwiSaver changes

Does travel to work come with a tax bill?

A new way to calculate your home
office costs

Have your say on vacant land tax

Tweaks and realignments in the
latest tax bill

Snapshot of recent developments

Despite this, investors still need to consider the rate being applied to avoid the pitfalls of it still being wrong, as discussed briefly in our June Tax Alert. It would also seem reasonable for Inland Revenue to consider a further amendment to allow investors with overpaid PIE tax to get a refund through their tax returns, particularly given the information Inland Revenue now has available and the highly automated tax return processes that now exist for many taxpayers.

On-payment of employer contributions

Under a proposed change, employer contributions will be paid by the Inland Revenue to scheme providers before the contribution is potentially received by Inland Revenue. Inland Revenue will pay the employer contributions as soon as practicable after the receipt of the employer payday report. This is likely to be before the date that the employer is obliged to pay the associated PAYE and contributions. This acknowledges that the employee should benefit as soon as practicable from having the funds invested in their chosen scheme. It also extends what is effectively a Government guarantee on a KiwiSaver member's employee contributions to the related employer contributions. This introduces a degree of credit risk for the Government.

Scheme transfers

Currently, if you want to transfer to another KiwiSaver scheme, the old provider has up to 35 days to transfer the funds and information. This time-period will reduce to 10 working days, in essence recognising the fact that it simply shouldn't take 35 days to carry out this task.

Changing a contribution rate

Further to the new 6% and 10% employee contribution rates, it is proposed that a member could change their employee contribution rate by notifying their scheme provider or Inland Revenue, rather than using the sole existing option of giving notice to their employer.

While it is suggested that this could improve the member / provider relationship, it does appear to risk introducing a further level of administration. That is, those parties will have to contact the employer, and the employer is likely to go back to the employee to verify the request before making the change, in any event.

PAYE and ESCT rates

Commentary to the proposals suggests that up to 63% of early adopters of payday filing are using incorrect employer superannuation contribution tax (ESCT) rates. That seems like an extraordinary number, although the ESCT rate bands and how the relevant amount is calculated do differ from the PAYE bands.



Given this, to better allow Inland Revenue to verify that the correct rate is being applied to KiwiSaver contributions, it is proposed that employers would provide Inland Revenue with information on any difference between an employee's income for PAYE and KiwiSaver purposes, and information on the employee's ESCT rate. While this could add compliance costs to employers, it should also reduce the risk of them incurring penalties due to miscalculations.

Other matters

Under the KiwiSaver legislation, Inland Revenue must pay interest on contributions from the 15th of the month in which employee contributions are deducted from salary / wages or from the 1st of the month in which employer contributions are received by Inland Revenue, until the date on which the contribution is passed on to the provider. With payday filing giving Inland Revenue sufficient and more 'real-time' information, interest on employee and employer contributions can now be calculated with reference to a member's payday. However, with the current interest rate on KiwiSaver contributions being 0.81% and the proposal to transfer employer contributions at an earlier date, this is unlikely to make a significant difference.

There are also a couple of proposals in relation to KiwiSaver enrolments. Firstly, the current three-month period during which an automatically enrolled member is provisionally allocated to a default provider and during which Inland Revenue holds onto any contributions will reduce to two months.

Secondly, a non-resident can currently enrol and then has three months to meet the residence requirement. This period will be removed – that is, a person not meeting the residence requirements will have their account closed immediately. Obviously they can still choose to become a KiwiSaver member when they do meet the requirements.



James Arbuthnott
Director

Tel: +64 4 470 3558
Email: jarbuthnott@deloitte.co.nz

Does travel to work come with a tax bill?

By Robyn Walker



In response to concerns (from unknown sources) that there was confusion about when employer-provided travel should be taxable, Inland Revenue has released a [draft operational statement](#) entitled “Employer-provided travel from home to a distant workplace – income tax (PAYE) and fringe benefit tax” (“draft OS”).

We suspect that the genesis of the draft OS is a concern following on from reforms to the [treatment of accommodation](#) back in 2014, where it was clarified in what situations employer provided accommodation was taxable, but there was no consideration of how flights or other travel costs associated with that accommodation should be treated.

The draft OS is intended to cover all employer provided travel, for example by car, taxi, plane, bus or train.

The contents of the draft OS perhaps raises more questions than it answers, with the actual “rules” Inland Revenue is proposing only being really clear through the provision of examples. One also has to make the assumption that the same position will apply to travel from a distant workplace to home, despite the title of the draft OS only contemplating one-way travel.

The starting position in the draft OS is that all employer provided travel from home to a distant workplace will be taxable unless one of four exclusions apply:

1. The travel is one-off or very occasional
2. The travel relates to a temporary posting or secondment
3. The employee also genuinely works at a hometown workplace
4. The employee works from home on specified days (and the travel relates to one of those days)

The travel is one-off or very occasional

Any incidental travel, for example attending a conference, will not be subject to tax. This rule applies regardless of whether the employee ordinarily works from home or at an office.

The travel relates to a temporary posting or secondment

Where there is a temporary (less than two year) posting to a distant workplace, the provision of travel will not be subject to tax. This would cover, for example, weekly return flights between cities for employees who are temporarily commuting.

Any travel which is for more than two years will be taxable unless another exception applies. What is not clear in the statement is whether the travel is taxable from day one, or if the travel only becomes taxable after two years.

The employee also genuinely works at a hometown workplace

Where an employee has two (or more) workplaces that they work from, travel to a distant workplace may be work-related travel and not taxable.

For example, Jim is based in Auckland and has a job based in Wellington. His employer agrees that he can work two days a week in the Auckland office and three days in Wellington. The travel between Auckland and Wellington will not be taxable.

It is not explicit, but rather implicit that this exemption is intended to apply when an employee is working from employer offices in each location rather than working from home. However the draft OS does note that an employee can be travelling directly from home, rather than requiring them to go into the office prior to leaving for the distant workplace.

The employee works from home on specified days (and the travel relates to one of those days)

The draft OS provides a view that a home can be a workplace depending on the arrangements between the parties. A home will not be a workplace if an employee can merely choose to work at home from time to time, there must be an employment arrangement which requires the employee to work from home on specified days. The home will be a workplace on the specified days, but will be a home on the other days. Any travel on a day that the home is just a home will be taxable.

The logic of this last exemption can be difficult to understand, as it represents a very inflexible approach and may not reflect commercial reality where employers and employees have a degree of flexibility to fit around work requirements (for example, if there is an important meeting on a day that an employee ordinarily works from home, they can work in the employers office that day and work from home on an alternative day when there are not work demands to be physically present in the office).

Examples:

To illustrate the intended application of these rules we replicate several examples from the draft OS below:

Multiple workplace approach

Under Adele's employment arrangement, she is contracted to work at home on a full-time basis. This means home is usually her sole place of work. Therefore, it can be considered to be her workplace on every work day. As any employer-provided travel from Adele's home to a distant workplace (for example, for a specific meeting or purpose) is very occasional or could be considered to be one-off, it is not subject to tax.

Whether person has multiple workplaces

Ruby lives in Auckland and works for a government agency. She has a permanent working arrangement where she works Monday and Tuesday at home. On Wednesday, Thursday and Friday, Ruby works at the agency's Auckland office. Ruby is seconded to work on a 26-month project that requires her to work in Wellington on Thursday and Friday.

As the project is for more than two years, the key question is whether Ruby has at least two Workplaces so that the multiple workplace approach applies. As Ruby normally works in the Auckland office on Wednesday, Thursday and Friday, any employer-provided travel from Ruby's home to Wellington in relation to her work in Wellington would be treated as travel between multiple workplaces (the Auckland office and the Wellington workplace).

Therefore, the multiple workplaces approach would apply in relation to this particular employer-provided travel and it would not be subject to tax.

Whether home is a workplace when a person is permitted to work at home

Leo lives in Tauranga but the company he works for is based in Auckland. Under his employment contract Leo can work up to two days a week at home in Tauranga. The days that Leo works at home can vary depending on personal and business convenience. Leo's employer provides him with travel between his home in Tauranga and the Auckland office in the form of plane flights and connecting taxis.

This is an ongoing arrangement, so the main question is whether Leo has at least two workplaces so that the multiple workplace approach applies. It is important to determine whether Leo's home is a workplace. Leo does not have specified days where he works at home, which means the Commissioner will not accept that his home is a workplace for any particular day, for the purposes of the multiple workplaces approach.

Therefore, as Leo only has one workplace (the Auckland office) the multiple workplace approach does not apply in relation to this employer-provided travel, which is subject to tax.

(If Leo and his employer had a different arrangement where Leo had specified days where he was required to work from home (for example, Monday and Tuesday), then home would be accepted to be Leo's workplace on those days.)

Whether home is a workplace when person required to work at specified places on different days

Phil is contracted on an ongoing basis to work Monday, Tuesday and Wednesday at his home and Thursday and Friday at a distant workplace. This ongoing arrangement is expected to last for more than two years. Therefore, the key question is whether Phil has at least two workplaces (the possibilities are home and the distant workplace) so that the multiple workplace approach applies.

It is important to determine whether home is a workplace. In this circumstance, home is clearly a workplace on Monday, Tuesday and Wednesday, and employer-provided travel to the distant workplace relating to those days will not be taxable. An example of this would be attendance at a conference or meeting on one or more of those days.

But on Thursday and Friday Phil does not work from his home, so home is still his home for these purposes on those days. Consequently, employer-provided travel from home to the distant workplace will be travel from home to work (and taxable) when it is undertaken for the purpose of getting Phil to that distant location, so he can work there on Thursday and/or Friday.

This means employer-provided travel from his home to a distant workplace on Monday, Tuesday or Wednesday will be taxable, if the travel is undertaken so Phil can undertake his work on Thursday and Friday.

What if you've been doing it wrong?

The draft OS proposed that Inland Revenue will apply the positions outlined in the draft OS once it is issued in final form. Employers who may now consider that some travel being provided may actually be taxable will not need to revisit past tax positions, but will need to apply the rules going forward.

Next steps

We recommend that employers providing employee travel consider the application of the draft OS to existing arrangements. Submissions are being taken on the draft OS until 6 September 2019.

Please contact your usual Deloitte advisor if you would like more information.



Robyn Walker
National Technical Director

Tel: +64 4 470 3615
Email: robwalker@deloitte.co.nz

When is travel subject to PAYE and when is travel subject to FBT?

If employer-provided travel is taxable, the question then moves to whether it is taxable in the hands of the employee through the PAYE regime, or whether it is taxable to the employer through fringe benefit tax ("FBT"). The general rule to distinguish between PAYE and FBT is to think about who has incurred the cost of the travel. If the employee is incurring the costs and then being reimbursed by the employer or receiving a travel allowance the PAYE regime will apply. If the employer is paying for it directly (either through directly booking and paying for the travel, or the employee using an employer provided credit card to pay for the travel), then the FBT regime is in play. For travel other than by motor vehicle, any travel benefits will be an "unclassified benefit".

A new way to calculate your home office costs

By Emma Marr



Inland Revenue has recently published guidance on how to apply the 'square metre rate' option for calculating home office expenses, available to business owners who use some of their own home to run their business. Until the 2017/18 income year taxpayers had to apportion every expense relating to the home premises between business and private portions. The square metre rate option was introduced in 2017, and Inland Revenue has now published guidance on how to use it. [Operational Statement OS 19/03 \(Statement\)](#) applies from 4 July 2019, its date of publication.

If taxpayers want to use this option, they will not have to:

- Keep detailed records of utility costs (electricity, gas, insurance, phone, mobile and internet charges).
- Apportion these costs between business and private use of the residence.

They will still have to apportion costs related directly to the premises – interest on the mortgage, rates and rent.

Whether or not the square metre rate option is worthwhile is something every taxpayer will have to work out themselves – it does save time, but it might result in a lower deduction. Taxpayers might decide it is worth taking the extra time to get a bigger deduction, but ultimately will have to do the calculation both ways for at least one year to work out which is best.

The square metre rate deduction is very simple to calculate, by following these steps:

1. Calculate the area of the premises used primarily for business purposes.
2. Multiply that by the square metre rate set by the Government. The square metre rate for the 2018/19 income year is \$41.70.

3. Calculate the actual premises costs (e.g. mortgage interest, rates and rent), and then apportion that between the business and private use.
4. The sum is the total deduction available to the taxpayer for their home office costs.

The statement gives further guidance on each step, and this guidance is discussed below.

Taxpayers should also note that:

- If a taxpayer uses the square metre rate they cannot deduct costs relating to anything other than the utilities costs that are included in the square metre rate, and premises costs (e.g. depreciation wouldn't be deductible).
- Use of the square metre rate is optional



Identify the business part of the premises

These areas have to be separately identifiable parts of the buildings on the premises used primarily for business purposes:

- *separately identifiable parts of the buildings on the premises:* it has to be obvious, to a reasonable, objective person, that the particular area is identifiable as being used separately for the business. It would be easier to identify an area as being used for business purposes if it has a business asset in it, such as a computer, business records, or inventory.
- *used primarily for business purposes:* the area doesn't have to be used 100% for business purposes, but should be used mainly for that purpose. More than 50% use would be acceptable.

Examples of separately identifiable areas include a home office used primarily for business purposes, or a garage used to store business inventory.

Square metre rate

The square metre rate will be published annually. The square metre rate for the 2017 – 2018 income year was \$41.10 per square metre. The square metre rate for the 2018 – 2019 income year is \$41.70 per square metre.

Premises cost deduction

The premises cost deduction still has to be calculated using actual expenses, which are apportioned between business and private use. First, the taxpayer has to calculate the business proportion by dividing the total area of all buildings on the taxpayer's premises by the business square metres they have already calculated.

Final deduction

The total final deduction is the sum of the square metre rate deduction plus the premises cost deduction.

Whether this is a reasonable deduction will depend on the actual costs that the business would have been able to deduct if they had completed the full calculation based on actual costs, and the time required to do that calculation. The Statement notes that the square metre rate is determined using information obtained from Statistics New Zealand, to calculate the "national average, annual cost of utilities for the average sized New Zealand household." Premises related costs such as mortgage interest rates and rent are excluded from this calculation as they are considered too variable across New Zealand.

Please contact your usual Deloitte advisor if you need assistance in considering this calculation or any other issues related to a business use of your home premises.



Emma Marr
Associate Director

Tel: +64 4 470 3786
Email: emarr@deloitte.co.nz

Have your say on vacant land tax

By John Lohrentz



Recently, the Productivity Commission has invited submissions on whether a tax on vacant residential land would be a useful mechanism to further improve the supply of land for housing. This consultation originates from recommendations made by the Tax Working Group in Volume 1 of their 2019 Final Report that the Productivity Commission should consider the suitability of a vacant residential land tax and / or a tax on empty homes in residential areas in its review of local government financing. While there are difficulties in defining vacant land, and limited revenue potential, the Productivity Commission notes that there could be benefits on land supply (i.e. reduced land banking) and therefore housing affordability. However, the Tax Working Group points out that the tax would need to encourage substantive use of residential land / homes instead

of “token” efforts, and would be best implemented by local governments. It also notes that these types of taxes would appear to be most feasible in cases where a local authority has rezoned the land and provided infrastructure but the land remains vacant.

This consultation is part of the Productivity Commission’s recent draft report on Local government funding and financing, which is asking whether the “existing funding and financing arrangements are suitable for enabling local authorities to meet current and future cost pressures.” Consultation closes on 29 August 2019 and the final report is expected at the end of November 2019.



John Lohrentz
Corporate Responsibility Champ

Tel: +64 9 303 0736

Email: jlohrentz@deloitte.co.nz

Tweaks and realignments in the latest tax bill

By Emma Marr

Last month we mentioned that the Taxation (KiwiSaver, Student Loans, and Remedial Matters) Bill (the Bill) was tabled in Parliament on 27 June 2019. The Bill is available [here](#), the Bill Commentary is [here](#), and the Regulatory Impact Assessments are [here](#). The Bill contains proposals in relation to:

- Modernising and improving the settings for the administration of social policy by Inland Revenue (particularly in relation to KiwiSaver and Student Loans).
- Proposals aimed at improving current tax settings within a broad-based, low-rate framework.
- Other remedial matters, including in relation to the R&D tax credit regime, thin capitalisation, employee share schemes, provisional tax and binding rulings regime.

Changes in relation to the R&D tax credit regime were covered in the [July 2019 Tax Alert](#), and changes to KiwiSaver are discussed in a separate article in this month's Tax Alert. We highlight below some changes that are generally aimed at making tax compliance easier.

The Bill had its first reading on 23 July and Parliament then referred it to the Finance & Expenditure Select Committee. Submissions are due by 4 September.

Provisional tax

There are a number of relatively minor amendments to the provisional tax rules, in some cases to align the rules with the way the new Inland Revenue computer system works. The changes generally seem to be either of benefit to taxpayers or reasonably neutral.

Taxpayers who use the standard uplift method will not have to file an estimate for the final installment if they think their RIT will be less than the standard uplift amount. This is a practical and sensible change that reflects the practice of many taxpayers, but gives them the comfort of knowing it is also technically correct.

Student loans

The bill makes a few tweaks to the student loan scheme rules, none of which are fundamental but all of which will probably make a meaningful difference to some people's lives.

Changes that fall into the category of "you'd think they could already do this, but it's good they will be able to soon":

- Overseas borrowers who can't meet their student loan responsibilities because of a serious illness or disability can be treated as being physically in New Zealand, which would mean they don't have to pay interest and can make repayments based on their income, as New Zealand resident borrowers do.
- Inland Revenue will notify employers when an employee is about to pay off their student loan so that the final payment can be tailored to the exact amount owing, preventing an overpayment.
- Historic fraudulent loans can be written-off. Essentially this would apply if someone has been a victim of identity theft and the correct borrower cannot be identified.

Other ideas we cannot fault:

- Limiting circumstances in which a pre-2013 repayment obligation can be re-opened. Currently Inland Revenue has to maintain rules that applied from the start of the student loan scheme in 1992. This is incredibly complex and creates unnecessary administration. The change would allow Inland Revenue to apply one set of rules from 1992 to the current day.
- Renaming the repayment 'holiday' as a 'temporary suspension'.

If you have any questions about these or any other changes proposed in the legislation, please consult your usual Deloitte advisor.



Emma Marr

Associate Director

Tel: +64 4 470 3786

Email: emarr@deloitte.co.nz

Snapshot of Recent Developments: August Tax Alert



Policy Developments:

Taxation (Use of Money Interest Rates) Amendment Regulations 2019

On 4 July 2019, the [Taxation \(Use of Money Interest Rates\) Amendment Regulations 2019](#) were notified in the New Zealand Gazette. These regulations amend the Taxation (Use of Money Interest Rates) Regulations 1998 to:

- Increase the taxpayer's paying rate of interest on unpaid tax from 8.22% to 8.35% per annum; and
- Decrease the Commissioner's paying rate of interest on overpaid tax from 1.02% to 0.81% per annum.

These Regulations come into force on 29 August 2019.

Consultation document on clean car "feebate"

On 9 July 2019, the Ministry of Transport released a [consultation document](#) that proposes to make electric, hybrid and fuel efficient vehicles more affordable for Kiwis to buy, potentially by a discount of up to \$8,000 for new and used light vehicles entering the New Zealand fleet from 2021 onwards. Meanwhile, a fee up to \$3,000 will be charged on highly polluting imported vehicles.

Vehicles with a retail price of \$80,000 or more would not be eligible for discounts.

One of the trade-offs proposed in the discussion document is that the current exemption from Road User Charges (RUC) that exists for electric vehicles will end in December 2021. The exemption from RUCs has previously been held out as a reason not to consider amending how the fringe benefit tax rules apply to electric vehicles.

Consultation on a foreign trust distributions

Inland Revenue released a [draft interpretation statement](#) on the tax treatment of foreign trust distributions on 31 July 2019. This will be covered in the September edition of Tax Alert. Submissions are due on 10 September 2019.

Finalised Inland Revenue Items:

Income tax – salary and wages paid in crypto-assets – BR Pub 19/01

On 28 June 2019, Inland Revenue released the finalised public ruling, [BR Pub 19/01: Income tax – salary and wages paid in crypto-assets](#). This ruling considers whether regular remuneration received by employees in crypto-assets for services performed by the employee under an employment agreement are subject to

PAYE. The Commissioner considers that the concepts of "salary" and "wages" are wide enough to encompass some regular payments in crypto-assets. Therefore they are "PAYE income payments" and PAYE rules apply.

Income tax – bonuses paid in crypto-assets – BR Pub 19/02

On 28 June 2019, Inland Revenue released the finalised public ruling, [BR Pub 19/02: Income tax – bonuses paid in crypto-assets](#). This ruling considers that payment of an amount of crypto-assets to an employee in connection with their employment as an incentive or bonus is a "PAYE income payment" under s RD 3 and is subject to the PAYE rules.

Tax Cases:

[Mercury NZ Limited v Commissioner of Inland Revenue \[2019\] NZHC 1524](#)

The High Court held that turbine halls were "buildings" for the purposes of the depreciation provisions and therefore subject to a depreciation rate of 0%. The case considered whether turbine halls fell within the definition of "building" or are part of plant, i.e. the gantry cranes situated within the halls.

The High Court has determined that the turbine halls have walls (incorporating the gantry crane support systems), base and the cladding. These elements are one structural system. The Court also found that the turbine halls were buildings in the ordinary sense of the word and therefore should be treated as buildings for the depreciation provisions.

Tax Policy Work Programme

The tax policy work programme is being released on 8 August at the Young IFA breakfast. We will cover this in the next Tax Alert.



Follow us on Twitter

[@DeloitteNZTax](#)

Queries or comments regarding Alert can be directed to the editor, Emma Marr, ph +64 (4) 470 3786, email address: emarr@deloitte.co.nz.

This publication is intended for the use of clients and personnel of Deloitte. It is also made available to other selected recipients. Those wishing to receive this publication regularly are asked to communicate with:

The Editor, Private Bag 115033, Shortland Street, Auckland, 1140. Ph +64 (0) 9 303 0700. Fax +64 (0) 9 303 0701.

New Zealand Directory

Auckland Private Bag 115033, Shortland Street, Ph +64 (0) 9 303 0700, Fax +64 (0) 9 303 0701

Hamilton PO Box 17, Ph +64 (0) 7 838 4800, Fax +64 (0) 7 838 4810

Rotorua PO Box 12003, Rotorua, 3045, Ph +64 (0) 7 343 1050, Fax +64 (0) 7 343 1051

Wellington PO Box 1990, Ph +64 (0) 4 472 1677, Fax +64 (0) 4 472 8023

Christchurch PO Box 248, Ph +64 (0) 3 379 7010, Fax +64 (0) 3 366 6539

Dunedin PO Box 1245, Ph +64 (0) 3 474 8630, Fax +64 (0) 3 474 8650

Queenstown PO Box 794 Ph +64 (0) 3 901 0570, Fax +64 (0) 3 901 0571

Internet address <http://www.deloitte.co.nz>

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities. DTTL (also referred to as "Deloitte Global") and each of its member firms are legally separate and independent entities. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities provide services in Australia, Brunei Darussalam, Cambodia, East Timor, Federated States of Micronesia, Guam, Indonesia, Japan, Laos, Malaysia, Mongolia, Myanmar, New Zealand, Palau, Papua New Guinea, Singapore, Thailand, The Marshall Islands, The Northern Mariana Islands, The People's Republic of China (incl. Hong Kong SAR and Macau SAR), The Philippines and Vietnam, in each of which operations are conducted by separate and independent legal entities.

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our network of member firms in more than 150 countries and territories serves four out of five Fortune Global 500® companies. Learn how Deloitte's approximately 286,000 people make an impact that matters at www.deloitte.com.

Deloitte New Zealand brings together more than 1300 specialist professionals providing audit, tax, technology and systems, strategy and performance improvement, risk management, corporate finance, business recovery, forensic and accounting services. Our people are based in Auckland, Hamilton, Rotorua, Wellington, Christchurch, Queenstown and Dunedin, serving clients that range from New Zealand's largest companies and public sector organisations to smaller businesses with ambition to grow. For more information about Deloitte in New Zealand, look to our website www.deloitte.co.nz.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively, the "Deloitte Network") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser. No entity in the Deloitte Network shall be responsible for any loss whatsoever sustained by any person who relies on this communication.

© 2019. For information, contact Deloitte Touche Tohmatsu Limited.

We are introducing a new entity to our client facing structure, Deloitte Limited. From 1 June 2016, we will transition to having Deloitte Limited be the party responsible for providing our services. More information here www.deloitte.com/nz/aboutus