

**ARGO GLOBAL LISTED INFRASTRUCTURE LIMITED**  
**TAX TRANSPARENCY REPORT**  
**2023-2024**

## **Introduction**

Argo Global Listed Infrastructure Limited (ALI or Company) actively manages a portfolio of global listed infrastructure securities, diversified by sub-sectors and geographies, with the objective of providing both long-term capital growth and dividend income for shareholders.

The Company's operations are managed by Argo Service Company Pty Ltd (ASCO or Manager), which has engaged Cohen and Steers Capital Management Inc. (CNS or Portfolio Manager) to actively manage the portfolio under the supervision of the Manager. The Manager provides these services under Australian Financial Services Licence no. 470477. The Manager is a wholly owned subsidiary of Argo Investments Limited, which is a substantial shareholder of the Company.

The Company engages State Street Australia Limited to provide custodial and administration services. The professional services provided by State Street include administration, accounting, regulatory and taxation.

The Board of ALI is committed to responsible financial and business practices and the highest standards of corporate governance to protect and advance shareholders' interests. As part of this commitment, the Board has determined that the Company publish a Tax Transparency Report in accordance with the Voluntary Tax Transparency Code as developed by the Board of Taxation.

## **Risk management framework**

ALI's Risk Management Policy addresses the elements of the Company's risk management framework including how risks are identified and managed and who is responsible for risk.

The Risk Management Policy is available at:

<https://argoinfrastructure.com.au/corporate-governance/>

## **Responsibilities**

### Board

The Board oversees the operational and financial risks of the Company, including taxation risk with the assistance and recommendations of the Audit & Risk Committee.

### Audit & Risk Committee

The Board has delegated responsibilities to the Audit & Risk Committee in relation to financial reporting, internal financial controls and facilitating the external audit.

### Management

Management has developed the Company's taxation compliance strategy and designed its taxation risk management system. Management regularly reports to the Audit & Risk Committee on taxation matters and discusses any relevant issues.

The Managing Director and the Chief Financial Officer provide management representation assurance letters twice a year to the Board confirming the Company's financial statements are founded on a sound system of risk management and internal control.

## **Taxation compliance strategy**

ALI's taxation compliance strategy is to provide conservative tax effective accounting under current taxation legislation and ATO guidance to ensure tax obligations are met. The Company looks for certainty in tax outcomes and therefore does not pursue risky or uncertain positions.

## **Taxation risk management**

In accordance with the Company's risk management framework, the Company's business environment is regularly reviewed for new taxation risks and its current taxation risks are continually monitored.

ALI's risk management and internal control systems ensure compliance by the Company with its taxation obligations.

Management consults the Company's external auditor and tax advisers, Ernst & Young (EY) on all significant transactions and medium/high taxation risk matters to ensure correct application to enable the Company to meet its taxation obligations.

### Taxation risk controls

To reduce the risk of misstatement in the calculation and provision for taxation, the Company has the following controls in place:

- As part of the half-year review and full-year audit, EY review the Company's provision for tax payable and confirm the franking account balance;
- Management and EY tax specialists annually review and confirm accounting and tax treatment of investment transactions to ensure treatment is consistent with ATO legislation and guidance; and
- Management review the Company's tax return provided by the custodian and engages EY tax specialists to review and lodge the return each year.

## **Income tax reconciliations**

A reconciliation of ALI's accounting profit to its income tax expense is included in Note 3 of the Company's 2024 Annual Report in accordance with International Financial Reporting Standards (IFRS).

The Company provides the following information to enhance transparency of ALI's tax outcomes in accordance with the Voluntary Tax Transparency Code:

- 1) Reconciliation of accounting profit for the year ended 30 June 2024 to income tax refundable;
- 2) Effective company tax rate; and
- 3) Reconciliation of current tax asset at 30 June 2024 to tax paid for the 2023-24 year.

## 1) Reconciliation of accounting profit for the year ended 30 June 2024 to income tax refundable

	<b>2024</b>
	<b>\$'000</b>
Profit for the year before tax	15,939
Nominal tax at 25%	3,985
Less: effect of change in tax rate from 30% to 25%	(841)
Less: franking credits on dividends received	(4)
Less: other	(48)
<b>Income tax expense as per Statement of Profit or Loss</b>	<b>3,092</b>
Plus: deferred tax temporary differences	917
Less: foreign tax credits	(1,957)
Less: PAYG tax instalments paid	(3,173)
<b>Tax refundable as per Statement of Financial Position at 30 June 2024</b>	<b>(1,121)</b>

## 2) Effective company tax rate

	<b>2024</b>
	\$'000
Profit for the year before tax	15,939
Income tax expense as per Statement of Profit or Loss	3,092
Change in tax rate from 30% to 25%	<u>841</u>
<b>Tax expense</b>	<b>3,933</b>
<b>Effective tax rate</b>	<b>24.7%</b>

The effective tax rate, excluding the effect of change in tax rate, would be 19.4%.

### 3) Reconciliation of current tax asset at 30 June 2024 to tax paid for the 2023-24 year

	<b>2024</b>
	<b>\$'000</b>
Tax payable	2,052
PAYG tax instalments paid	<u>(3,173)</u>
<b>Tax refundable as per Statement of Financial Position at 30 June 2024</b>	<b>(1,121)</b>
<b>Add: Tax refunded post 30 June 2024</b>	<b>1,160</b>
Over provision of tax for 2023-24 year	39

The over provision amount above arises from adjustments as per annual tax statements received after 30 June 2024 from trusts. The over provision amount has been accounted for in the Company's financial statements for the year ended 30 June 2025.