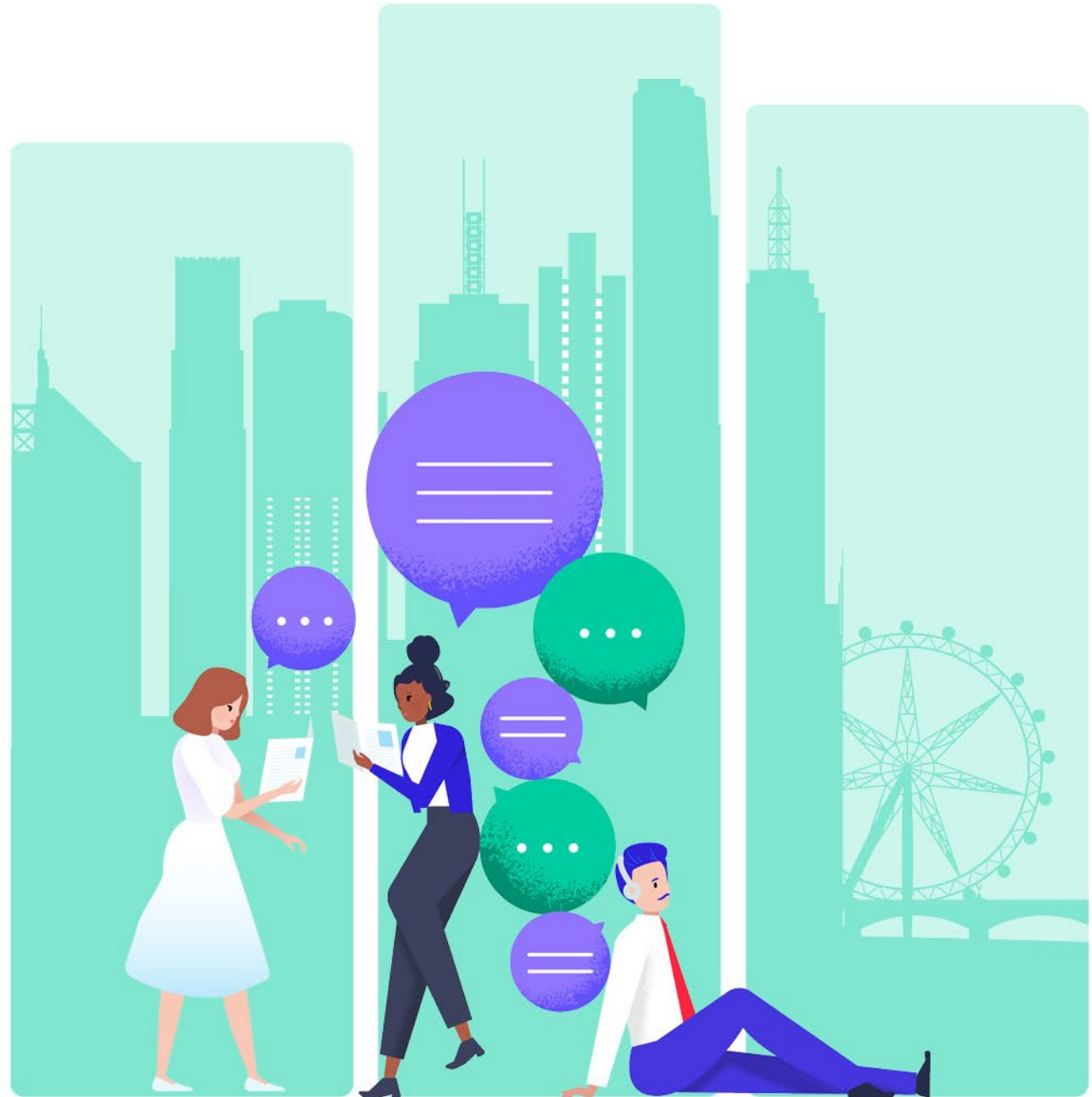


VIC Tax Forum

21–22 March 2024

Park Hyatt Melbourne

12 CPD hours



The Tax Institute gratefully acknowledges the generous assistance of members of the Organising Committee:

Chaya Lal, FTI, PKF Melbourne
(Chair, VIC Tax Forum Organising Committee)

Stephen Chen, CTA, MinterEllison
(Chair, Hot Topics stream sub-committee)

Luke Imbriano, FTI, KPMG Law
(Chair, Corporate stream sub-committee)

Laura Spencer, ATI, KHQ Lawyers
(Chair, SME stream sub-committee)

Megan Bishop, Holding Redlich

Adam Dimac, ATI, Hall & Wilcox Lawyers

Karen Goodfellow, CTA, Tappli Pty Ltd

Greg Judd, ATI, Arnold Bloch Leibler

Russell Krupp, CTA, BlueRock

Elena Kuzmina, FTI, BlueRock

Angela Lee, Victorian Bar

Tyrone Liu, Deloitte

Frederick Mahar, CTA, FM Mahar & Associates

Archana Manapakkam, FTI, Velocity Legal

Narelle McBride, CTA, PwC

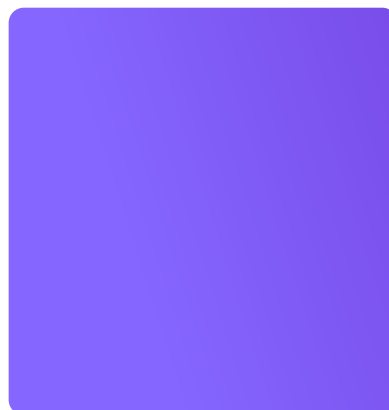
Matthew Meng, Victorian Bar

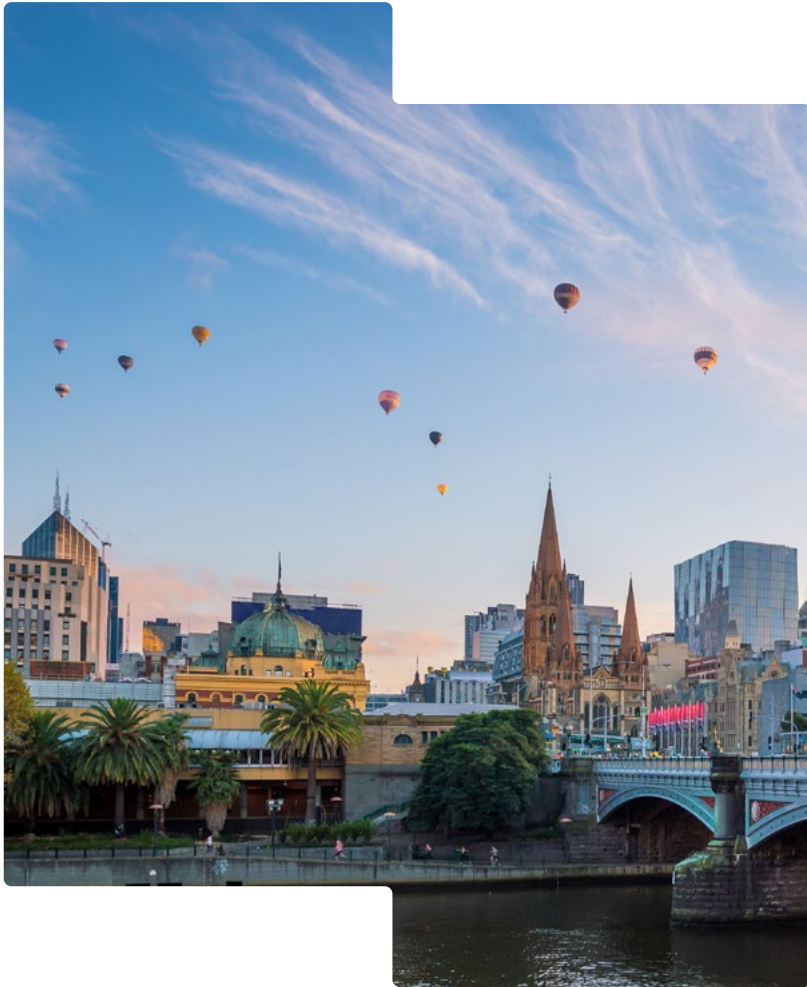
Justin Orders, KPMG

Sylvester Urban, King & Wood Mallesons

Zannie Zaidi, Australian Taxation Office

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Welcome

In reflecting on the year that was, it seems that there are few common themes emerging which have remained in focus for practitioners and their clients. The headlines are currently about the war between Israel & Palestine, the increased scrutiny on our profession, building and construction buckling under pressure, the rental crisis and of course, the rise in interest rates with the government desperately trying to curb inflation. The conversation practitioners are having with their clients is about when 'things will get better' and what can we do now to prepare for the future.

The increased scrutiny on our profession marks a turn ... for the better. We are being expected to 'do better' especially when it comes to ethics and rightly so. A practitioner's role does not only entail providing clients with sound tax advice. Having a deep understanding of our clients, their businesses and the expectations put on us by the regulatory authorities is a 'nonnegotiable'. Continually improving one's knowledge and keeping up with changes whether it be a result of new legislation (or new views on existing legislation(!)) or alternate views resulting from cases goes hand in hand with the 'fundamentals of being a trusted advisor'.

This year, The Tax Institute and the organising committee who all selflessly donate their time and expertise, have curated another fantastic program. Every session has been carefully chosen to ensure we are better placed to navigate current challenges such as changes in legislation, the advent of AI and the impact on the profession, the tax impact of operating in an uncertain economy to name a few. Some session highlights this year are as follows:

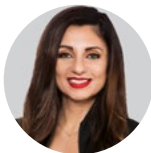
- Decoding s99B – A panel perspective. This session will be facilitated by Leanne O'Connor, CTA, WGC Business Advisors with the panel made up of Fiona Dillon, CTA, Australian Taxation Office, Michael Flynn, KC, CTA (Life), VIC Bar and Kaitlyn Lowdon, ATI, Arnold Bloch Leibler.
- Thin Capitalisation – Is third party debt really deductible? A practical focused presentation by Justin Orders, KPMG.
- Div 7A – Exploring sleeper issues with practical solutions (including a discussion around the Bendel Case and impact on practitioner advice).
- Crypto in tax – Join Anthony Bach, CTA, Australian Taxation, Office, Joni Pirovich, Block Chain + Digital Assets, Tuan Van Le, Aptum Legal as they discuss where we are and what the future looks like for tax and crypto in Australia.

A heartfelt thank you to all the members of the organising committee, in particular the stream chairs, for their efforts in putting together yet another brilliant program this year.

We look forward to seeing you in person for what will prove to be an exceptional event.

Early bird pricing offer

Register on or before Friday, 23 February to save!



**Chaya Lal, FTI,
PKF Melbourne**
Chair, VIC Tax Forum
Organising Committee



**Laura Spencer, ATI,
KHQ Lawyers**
Chair, SME stream
sub-committee



**Luke Imbriano, FTI,
KPMG Law**
Chair, Corporate stream
sub-committee



**Stephen Chen, CTA,
MinterEllison**
Chair, Hot Topics stream
sub-committee

Program at a glance

PLENARIES

Economic outlook
Keynote address
Climate and tax

SME

Decoding section 99B Panel perspectives
SME Tax – Recent cases and their implications
Division 7A – How well do you think you know the provisions?
Relevant contractors & payroll tax
Global tax challenges – Navigating international issues for private clients
Fraud and evasion – Insights and preventive measures
Small business restructures – Strategies, avoiding pitfalls and case studies
Superannuation – Latest developments

CORPORATE

Corporate Tax – Recent cases and their implications
Heads of Tax Panel
Cross-border arrangements and Australia’s anti-avoidance measures – Where are we at?
Thin capitalisation update
So what does “ChatGPT” mean for the future of tax?
Operating in an uncertain economy
M&A update
Taxation considerations for Build-To-Rent

HOT TOPICS

A whole new world – Recent developments in cross-border transfer pricing
Crypto in tax
State Tax Update
R&D issues and trends
Constitutional validity of State taxes on goods post-Vanderstock
Tax Advisor Conduct: Expectations & Consequences
Tax controversy issues
Employment tax



Technical program

Day 1 Thursday, 21 March 2024

Time	Session		
8:00 – 8:45am	Registration		
8:45 – 9:00am	Welcome and President’s address Speakers: Chaya Lal, FTI, Chair, VIC Tax Forum Organising Committee, Todd Want, CTA, President, The Tax Institute		
9:00 – 10:00am	Session 1: Economic outlook Speaker: Cherelle Murphy, EY Australia’s economy has slowed in response to higher interest rates, but inflation hasn’t yet fallen into the Reserve Bank’s 2-3 per cent target band. When will this happen? Will State and Commonwealth government spending on significant infrastructure projects thwart the Reserve Bank’s efforts? And while the cyclical evolves, will structural change from geopolitical friction, the aging population, tech uplift and decarbonisation knock the economy onto a different course? The answer to these questions will help you understand Australia’s economy outlook.		
10:00 – 10:30am	Morning tea		
Time	SME stream	Corporate stream	Hot topics stream
10:30 – 11:30am	Session 2A: Decoding section 99B Panel perspectives Speakers: Fiona Dillon, CTA, Australian Taxation Office, Michael Flynn KC, CTA (Life), Victorian Bar, Kaitilin Lowdon, ATI, Sladen Legal Facilitator: Leanne Connor, CTA, WGC Business Advisors Section 99B can deem money or other assets of a foreign trusts paid to a resident beneficiary, or applied for their benefit, as assessable income. Historically the application of this section has been relatively minimal however recent focus on it by the Australian Taxation Office (ATO) has sparked growing concerns in the industry as to the breadth of the section. In this session our expert panel, including the ATO’s Chief Tax Counsel and practitioners, will delve into Section 99B’s nuances and provided practical insights to navigate this area of tax.	Session 2B: Corporate Tax – Recent cases and their implications Speakers: Prudence Barker, Victorian Bar, Catherine Pierce, Victorian Bar This session will consider selected recent court decisions and their implications. Cases covered include, amongst others: <ul style="list-style-type: none"> • Hannover Life Re of Australasia Ltd v Commissioner of Taxation [2023] FCA 680 • Bechtel Australia Pty Ltd v Commissioner of Taxation [2023] FCA 676; and • Commissioner of Taxation v Complete Success Solutions Pty Ltd ATF Complete Success Solutions Trust [2023] FCAFC 19 	Session 2C: A whole new world – Recent developments in cross-border transfer pricing Speakers: Ed Ng, EY, Craig Silverwood, MinterEllison The area of transfer pricing has undergone some major developments over the last twelve months. Among other things, we have seen the release of draft practical compliance guidelines in relation to intangible arrangements, recent findings on review from the APA program, new legislation in relation to thin capitalisation rules, as well as further developments to BEPS 2.0: Pillar Two. In addition, the decision in Singtel v FCT will imminently be handed down, and will provide taxpayers on further guidance on Australian transfer pricing laws. This session, will cover these topics and more.

Technical program

Day 1 Thursday, 21 March 2024 *continued*

Time	SME stream	Corporate stream	Hot topics stream
11:30am-12:30pm	<p>Session 3A: SME Tax – Recent cases and their implications</p> <p>Speakers: Andrew de Wijn, Victorian Bar, Edward Moore, Victorian Bar</p> <p>2023 was a big year for SME tax cases, and it is always important for practitioners who advise in this space to be familiar with the latest developments.</p> <p>This session will dive into a selection of recent court and tribunal decisions from the past year, and analyse the implications of those decisions for private groups and individuals.</p>	<p>Session 3B: Heads of Tax Panel</p> <p>Speakers: Adrian Lovell, FTI, APA Group, Sandie Parker, Canva, Briana Witten-Ho, Ixom</p> <p>Facilitator: Narelle McBride, CTA, PwC</p> <p>This annual in-house session facilitated by tax leaders provides a fascinating window into matters facing corporate Australia from a tax leadership perspective. Our panellists will share experiences on a variety of topics ranging from career reflections to challenges and opportunities they face on a day to day basis, including the impact of current topical issues on their roles such as:</p> <ul style="list-style-type: none"> • Working with revenue authorities, managing reviews and other interactions; • Energy Transition; and • AI. 	<p>Session 3C: Crypto in tax</p> <p>Speakers: Anthony Bach, CTA, Australian Taxation Office, Joni Pirovich, Block Chain + Digital Assets, Tuan Van Le, Aptum Legal</p> <p>Cryptocurrency, in the form of Bitcoin, first began circulating in 2009. The ATO responded in December 2014, publishing guidance on how Bitcoin fits within the Australian taxation framework and clarifying that Bitcoin is to be treated as a CGT asset and subject to the CGT rules and is not a foreign currency. Since then, the ATO has published general guidance on the tax treatment of cryptocurrencies and NFTs in Australia. This presentation will discuss the tax treatment of crypto assets in Australia to date and consider the next steps in the future of tax and crypto, including:</p> <ul style="list-style-type: none"> • What are crypto assets and NFTs? • How has the ATO treated crypto assets? • Cryptocurrency as a capital asset • Investments: Corporates and funds • Other tax treatment; and • Future of tax treatment of crypto assets.
12:30-1:30pm <i>The session will commence at 12:45pm</i>	<p>Lunch and an Interview with the CEO</p> <p>Join The Tax Institute’s, CEO, Scott Treatt, CTA, for a candid conversation on the future and direction of The Tax Institute. This session will provide an open forum for delegates to raise any issues affecting the tax community.</p>		

Technical program

Day 1 Thursday, 21 March 2024 continued

Time	SME stream	Corporate stream	Hot topics stream
1:30 – 2:30pm	<p>Session 4A: Division 7A – How well do you think you know the provisions? Speaker: Alexis Kokkinos, ATI, Pitcher Partners</p> <p>It has been more than 26 years since Division 7A was introduced into the Income Tax Assessment Act 1936. One would think that basic principles about loans, distributions and payments by companies would be well established by now. However, recently the ATO have been forced to reconsider some of these basic principles and how Division 7A applies. This includes the release of TD 2022/11 concerning the ATOs view of unpaid entitlements and the recent AAT decision in Bendel which challenges that interpretation.</p> <p>We have also seen the ATO recently take different approaches on its application of Division 7A to partners in partnerships, and on how section 109R (the loan repayment provision) applies where there are interposed entities. This session will explore some of these key developments and discuss Division 7A risk management issues in light of these many current uncertainties.</p>	<p>Session 4B: Cross-border arrangements and Australia’s anti-avoidance measures – Where are we at? Speaker: Shahzeb Panhwar, PwC</p> <p>Cross-border arrangements and the operation of Australia’s anti-avoidance measures – where are we at and what do recent cases and ATO guidance materials mean for taxpayers? This session will consider the lessons from recent cases and what it means for cross-border financing and cross-border arrangements moving forward and how taxpayers can manage some of the evidentiary issues which arise.</p>	<p>Session 4C: State Tax Update Speaker: Simon Tisher, CTA, Victorian Bar</p> <p>There is a lot happening in state taxes, both in the Courts and through legislative changes. New taxes, expanded tax bases, exemptions, new cases and rulings are all hot topics. Join us for this session where we will discuss:</p> <ul style="list-style-type: none"> • Duty and landholder duty – including the new Commercial and Industrial Property Tax and other developments • New Windfalls Gains Tax • Land tax and Vacant Residential Land Tax changes – beware! • Other news: cases, rulings and the legislative pipeline; and • Tips and traps in taking on the SRO.
2:30 – 3:00pm	Afternoon tea		

Technical program

Day 1 Thursday, 21 March 2024 continued

Time	SME stream	Corporate stream	Hot topics stream
3:00–4.00pm	<p>Session 5A: Relevant contractors & payroll tax Speaker: Jack Aquilina, Dentons</p> <p>This session will look at recent developments in identifying relevant contractors for payroll tax purposes and will discuss the following:</p> <ul style="list-style-type: none"> • Setting the context – Uniform payroll tax law in Australia • The approach being taken by the Chief Commissioner of State Revenue in NSW to justify the application of the relevant contractor provisions, and importance of their and administrative approach for Victoria • The approach taken by the parties and the Court in the recent hearing of the NSW Supreme Court in the first mortgage aggregation case <i>Loan Market Group Pty Ltd v Chief commissioner of State Revenue (2020/0027826)</i>, and persuasive value of NSW case law in payroll tax context; and • The implications for Victorian payroll tax practitioners, in particular for medical centres as a result of the VSRO’s recently issued <i>Revenue Ruling PTA-041 – Relevant contracts – medical centres</i>, influenced by recent precedents such as <i>Commissioner of State Revenue v The Optical Superstore Pty Ltd [2019] VSCA 197</i> and <i>Thomas and Naaz Pty Ltd v Chief Commissioner of State Revenue [2023] NSWCA 40</i>. 	<p>Session 5B: Thin capitalisation update Speaker: Justin Orders, KPMG</p> <p>This session will explore the recent announced changes to the thin capitalisation through practical applications of the measures to ordinary financing structures and transactions.</p>	<p>Session 5C: R&D issues and trends Speakers: Jared Birbeck, Australian Taxation Office, Sukvinder Heyer, Grant Thornton</p> <p>This session will cover emerging issues and trends in the R&D space from the ATO and practitioner perspective.</p> <p>From the ATO we will hear about concerning trends.</p> <p>We will also hear from a leading industry advisor on the opportunities and challenges faced when advising clients on their R&D matters.</p>

Technical program

Day 1 Thursday, 21 March 2024 continued

Time	Session
4:00–5:00pm	<p>Session 6: Trending topics in tax for practitioners Speaker: Robyn Jacobson, CTA, The Tax Institute</p> <p>The tax space continues to be dynamic and proposed measures often have long lead times ahead of implementation. 2024 is off to a flying start with a range of significant tax announcements and policy development already underway.</p> <p>The session will cover the hot topics affecting tax practitioners today, including:</p> <ul style="list-style-type: none">• Redesigned Stage 3 personal income tax cuts• Small business incentives• Appeal to the Federal Court of the Tribunal’s decision in <i>Bendel and Commissioner of Taxation</i> [2023] AATA 3074 relating to Division 7A and UPEs• Latest corporate tax measures• Latest superannuation measures, including Division 296, NALI/NALE and Payday super• Client-agent linking• New TASA obligations• Recent key MYEFO 2023–24 announcements.
5:00pm	Welcome reception



Welcome reception

After a full day of technical toil, join your colleagues and conference speakers for an evening of drinks, canapes and networking.

Time: From 5:00pm

Venue: Park Hyatt Melbourne

Price: Inclusive for all full registration delegates.
\$80 for additional tickets – see registration form for details

Dress: Business or business casual

Technical program

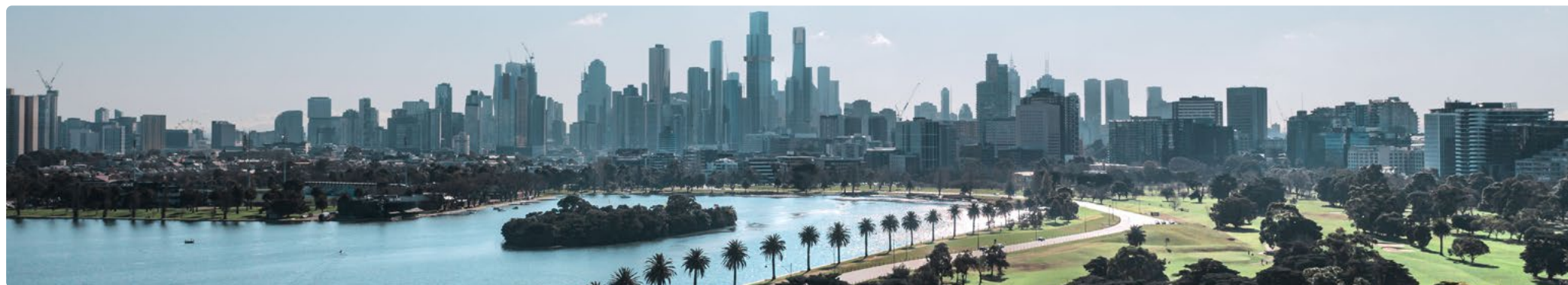
Day 2 Friday, 22 March 2024

Time	SME stream	Corporate stream	Hot topics stream
9:00–10:00am	<p>Session 7A: Global tax challenges – Navigating international issues for private clients Speakers: Angela Bryce, CTA, Pitcher Partners, Denise Honey, CTA, Pitcher Partners</p> <p>Flexible work arrangements are resulting in an increasing number of individuals choosing to live and work in a different country than their employer. In a post-covid world, many people are also choosing to relocate overseas for family or business opportunities. In Australia we are seeing considerable inbound and outbound flows as a result of these trends. This can raise a myriad of tax issues. This session will focus on the following aspects:</p> <ul style="list-style-type: none"> • Tax residency, including residency for tax treaty purposes • PAYG withholding requirements • Permanent establishment risks • Allocation of taxing rights between jurisdictions; and • Tax watch-outs when ceasing Australian tax residency including potential impacts on related structures. 	<p>Session 7B: So what does “ChatGPT” mean for the future of tax? Speakers: Ed Hewings, KPMG, Barry Sullivan, KPMG</p> <p>This session will explore what AI means for the tax function of the future in 2 – 3 years’ time, including:</p> <ul style="list-style-type: none"> • Explanation of what AI is and where we currently are at, including generative AI and “Chat GPT” • Practical considerations for tax functions using AI, including trusted / responsible AI and governance frameworks of the future, and what expectations may look like when it comes to how tax is managed and administered • ATO considerations and perspective, including current usage, challenges and future of AI for government departments; and • Real life demonstrations of AI capabilities in tax. 	<p>Session 7C: Constitutional validity of State taxes on goods post-Vanderstock Speakers: Tim Grace, Victorian Bar, Ron Merkel SC, Victorian Bar, Thomas Wood, Victorian Bar</p> <p>The “electric vehicle tax” decision in <i>Vanderstock v Victoria</i> [2023] HCA 30 is likely to have far reaching implications for Australia’s tax jurisprudence and political economy. Edelman J’s dissent notes at [677] there may be real questions about constitutionality for State taxes in some circumstances. The dissenting Steward J at [825] agrees with Edelman J at [612] it may require a “fresh start” on what constitutes an impermissible imposition of an “excise” by a State.</p> <p>This distinguished panel will address the decision, with significant time allowed for questions from the audience.</p>

Technical program

Day 2 Friday, 22 March 2024 continued

Time	SME stream	Corporate stream	Hot topics stream
10:00 – 11:00am	<p>Session 8A: Fraud and evasion – Insights and preventive measures Speakers: Ash Khera, Australian Taxation Office, Angela Lee, Victorian Bar, Kasey Macfarlane, Australian Taxation Office Facilitator: Karen Goodfellow, CTA, Goodfellow Tax Advisory</p> <p>This panel session will discuss:</p> <ul style="list-style-type: none"> • What constitutes fraud or evasion • The difference between avoidance and evasion • The consequences of engaging in evasion • Criminal offences; and • The burden and standard of proof. 	<p>Session 8B: Operating in an uncertain economy Speakers: Robert James, FTI, Mazars</p> <p>This session will provide an overview of the key tax considerations for common transaction undertaken by businesses facing uncertainty including:</p> <ul style="list-style-type: none"> • Debt and business restructuring • Business sales; and • Capital injections. 	<p>Session 8C: Tax Advisor Conduct: Expectations & Consequences Speakers: Elinor Kasapidis, CPA Australia, Jenny Lin, Australian Taxation Office, Michael O’Neill, Tax Practitioners Board</p> <p>Tax advisors play an important role in the tax system and in influencing the tax performance of their clients. This session examines the intricate intersection between a client’s tax performance and the potential consequences for the tax agent or advisor. The panel will consider the issues from the perspectives of the ATO, TPB and practitioners on topics including:</p> <ul style="list-style-type: none"> • Expectations in relation to advisor behaviour • Current areas of focus and concern for the ATO and TPB • Key regulatory changes; and • Consequences for tax agents and advisors in relation to tax disputes, including considerations for the agent’s registration with the TPB and/or application of the promoter penalty provisions.



Technical program

Day 2 Friday, 22 March 2024 continued

Time	Session
11:00 – 11:30am	Morning tea
11:30am – 12:30pm	<p>Session 9: Climate and tax Speakers: Jason Barnes, CTA, King & Wood Mallesons, Anna Skarbek, Climateworks</p> <p>Much has been written about ESG. The ‘E’ – the environment and, more specifically, climate – is at the forefront of debate on topics such as decarbonisation. But how does tax fit in to the discussion? What climate-related tax provisions currently exist And, aside from a carbon tax, what provisions and policy could be implemented to drive change?</p> <p>This session will discuss the existing tax provisions that might be applicable to greenhouse gas reduction initiatives, possible areas of reform and provide views from a broader climate perspective, including decarbonisation and sustainable finance.</p>

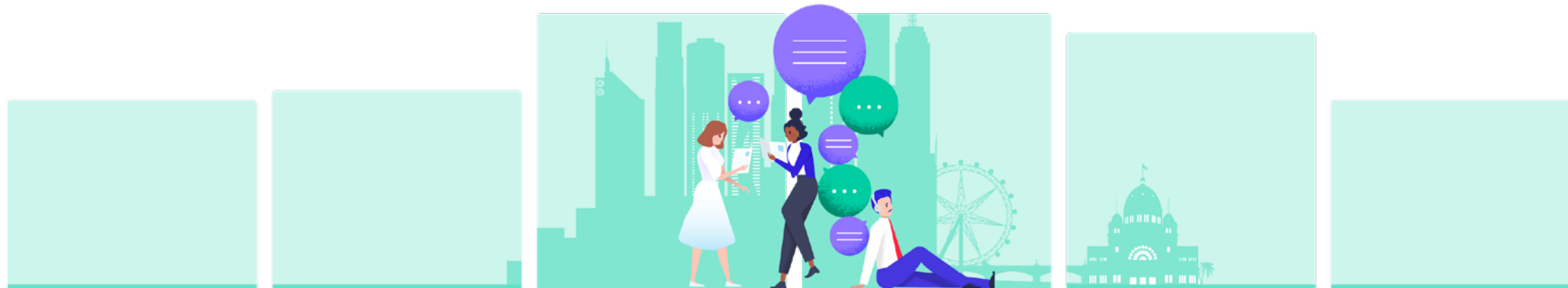
12:30 – 1:30pm	Lunch
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Time	SME stream	Corporate stream	Hot topics stream
1:30 – 2:30pm	<p>Session 10A: Small business restructures – Strategies, avoiding pitfalls and case studies Speaker: Andrew Henshaw, CTA, Velocity Legal</p> <p>Small Businesses are in unique position in that they typically have more tools available to reduce, eliminate or rollover the tax liabilities that would otherwise arise from a business restructure. In addition to general CGT rollovers such as those contained in Subdivisions 122-A, 122-B, 124-N, 124-M and Division 615, those options include the Small Business Restructure Rollover (Subdivision 328-G) and the Small Business CGT Concessions (Division 152).</p> <p>This session will look at using the Small Business Restructure Rollover and the Small Business CGT Concessions to facilitate a business restructure and examine the pros and cons of each option, tips and traps (and how to avoid them) when restructuring small businesses, and case studies.</p>	<p>Session 10B: M&A update Speaker: Enzo Coia, CTA, Deloitte</p> <p>This session will consider developments in tax aspects associated with M&A transactions. It will consider actual transactions and use practical examples to illustrate the changes in the tax landscape and due diligence focus areas over the past 12 months.</p>	<p>Session 10C: Tax controversy issues Speakers: Arthur Athanasiou, CTA (Life), Thomson Geer Lawyers, Claire Horan, Victorian Bar, Nick Westerink, Australian Taxation Office</p> <p>This esteemed panel from all corners of the tax landscape, will field questions on topics such as:</p> <ul style="list-style-type: none"> • Default assessments • Fraud and evasion • Settlements • How to engage with the Commissioner of Taxation; and • Alternative dispute resolution and the role of the new Administrative Review Tribunal.

Technical program

Day 2 Friday, 22 March 2024 continued

Time	SME stream	Corporate stream	Hot topics stream
2:30 – 3:30pm	<p>Session 11A: Superannuation – Latest developments Speaker: Liz Westover, FTI, Deloitte</p> <p>The superannuation landscape continues to change, and regulators remain focussed on a number of fronts. This session will look at current issues in the world of superannuation, including the new Division 296 tax (the proposed reduction of tax concessions for individuals with a total superannuation balance above \$3 million).</p> <p>Liz will discuss payday super proposals as well as the ATO’s 2023 compliance approach to employers who don’t pay employees’ super in full, on time and to the right fund. She will also go through SMSF compliance matters on the ATO’s radar and highlight critical areas for advisers to be aware of and common errors seen in practice.</p>	<p>Session 11B: Taxation considerations for Build-To-Rent Speakers: Nicola Crowle, Deloitte, Katie Lattimore, Deloitte, Geoffrey Mann, CTA, Deloitte</p> <p>This session will provide update on the current tax landscape for Build-To-Rent (BTR) in light of recent changes to stamp duty and land tax treatment of build to rent in various States, general GST considerations as well as announced changes to the MIT withholding tax rate for eligible activities.</p>	<p>Session 11C: Employment tax Speaker: Megan Bishop, Holding Redlich, Ross Hocking, CTA, Holding Redlich</p> <p>Employment taxes remain a minefield – recent Court authorities serving to show the differences not the similarities that exist between taxes.</p> <p>Join this discussion which will consider:</p> <ul style="list-style-type: none"> • The proposed legislative changes • Current state of play for superannuation following Court clarification of the principally for labour test; and • Payroll taxes including the relevant contractor provisions and how the State Revenue Authorities are diverging in their administration.
3:30pm	Conference close and Networking drinks		



Presenters

Arthur Athanasiou, CTA (Life), is a partner at Thomson Geer. Arthur's main area of practice is dispute resolution, particularly in the SME sector, with the ATO, TPB and the SRO. Arthur has many years' experience in complex tax audit, negotiations, settlements and tax litigation. He also has broad experience in the taxation of SME entities, with an emphasis on Division 7A and high wealth individuals and family groups. Arthur is an associate professor at La Trobe University Law School. He has qualified as a Chartered Accountant, is a former President of The Tax Institute, chaired the Law Institute's Tax Law Advisory Committee and now serves on the Industry Advisory Board of the IPA-Deakin University SME Research Centre. Arthur is an Accredited Tax Law Specialist, is a widely published writer on taxation issues and regularly appears in the mainstream media.

Jack Aquilina is the Managing Associate in the Tax Law and Disputes Practice in the Dentons Melbourne office. Jack represents clients in the tax dispute and litigation process and manages interactions with revenue authorities, including tax audits and reviews. Jack also advises clients extensively as to the revenue consequences of their transactions and corporate structures, particularly in minimising tax risk and

enabling early compliance. Jack's proven experience deploying a strategic, commercial, and evidence-based approach to managing reviews, audits, and complex litigation has enabled him to achieve commercial and principled outcomes in the best interests of his clients. Along with his work with clients, Jack is currently a doctoral candidate at Deakin University Law School where he is undertaking research in the discipline of the law of taxation. He is an Academic and Lecturer at Deakin University Law School and La Trobe University Law School, where he delivers substantive legal units, particularly within the tax and criminal law disciplines. Jack is also a Senior Fellow at the University of Melbourne Law School where he lectures in the Tax Law Masters Program.

Anthony Bach, CTA, is an Assistant Commissioner at the ATO and leads the Remuneration, Individuals and Charities work focus group in the Tax Counsel Network. With over 20 years' experience in the ATO, he previously worked as a senior director advising on privately-owned groups (with a particular focus on Division 7A), superannuation funds and public companies. He is a Chartered Tax Adviser with The Tax Institute and was named the "SME Tax Adviser of the Year" in 2018.

Prudence Barker is a Barrister specializing in taxation and commercial law. Her expertise encompasses state and Federal tax issues, bankruptcy, and contract law. She brings a wealth of experience to the Bar from her previous roles in tax at the Australian Taxation Office and EY, as well commercial experience as CEO of a medium-sized export business.

Jason Barnes, CTA is a Special Counsel in the Melbourne office of King & Wood Mallesons and has over 20 years' tax experience at leading law and accounting firms. Jason primarily practices in the area of income tax (including tax audits and litigation), but he has a broad ranging practice that extends to goods and services tax, stamp duty, fringe benefits tax and resource taxes. He advises Australian and overseas clients on the tax aspects of climate, financing, international and cross-border, commercial and capital management related transactions.

Jared Birbeck is a Director in the R&D risk team in Private Wealth at the Australian Taxation Office. Jared has specialised in R&D and innovation for more than 20 years across private practice, the University sector and with the ATO. Jared's 13 years within the ATO has seen him focus on the development

of public advice and guidance, strategic litigation and innovation tax policy and new measures across both publicly and privately owned markets. Jared is a technical specialist in the ATO on R&D and has authored taxation rulings, private rulings, taxpayer alerts, ATO Interpretive Decisions and web guidance on R&D. Jared is an admitted Australian legal tax practitioner and holds a Bachelor of Commerce, Bachelor of Laws and Legal Practice and a Masters of Taxation.

Megan Bishop is Special Counsel in the Holding Redlich Tax Risk, Dispute Resolution and Litigation Team. She is a qualified legal practitioner and an accredited mediator. She assists a wide range of clients in their interactions with the revenue authorities including in various ADR forums, VCAT, AAT, Federal Court and High Court appeals across a broad spectrum of tax issues, including most recently R&D disputes with AusIndustry and the ATO, transfer pricing, tax treaties, Part IVA and corporate and individual tax residency.

Angela Bryce, CTA, is a Client Director in the International Tax Group at Pitcher Partners. She has over 15 years' experience providing International and Employment Tax advice for a range

Presenters

of clients, including high net worth individuals and families, listed entities and large private groups. Angela is a member of Chartered Accountants Australia and New Zealand and is a Chartered Tax Advisor (CTA).

Enzo Coia, CTA, is a Tax Partner at Deloitte and leads the tax practice in power and utilities nationally and has deep expertise in advising clients in the mining and oil and gas industry. He has more than 20 years' experience providing advice on Australian and international taxation matters. He specialises in mergers and acquisitions, financing, capital management and dealing with revenue authorities.

Leanne Connor, CTA, is a Director of WGC Business Advisors, a chartered accountancy firm specialising in taxation and strategic advice to SMEs and high net worth individuals. Leanne has over 30 years experience providing accounting, business advisory, strategic superannuation and taxation services. Leanne's areas of expertise include tax and superannuation planning, business restructuring and understanding the fundamental issues relating to SMSFs, family trusts and private companies. Leanne is a Director and National Council member of The Tax Institute and past

chair of its Victorian State Council & PD Committee. She is a regular presenter for The Tax Institute and winner of the 2020 SME Tax Adviser of the Year Award.

Nicola Crowle is an Account Director, Indirect Tax at Deloitte specialising in state taxation. She has over 10 years professional experience advising clients across the spectrum of M&A, restructures, property transactions and disputes across all jurisdictions. She acts for clients in Aged Care, Agriculture, Government, Energy, Private Equity, Real Estate and Superannuation. Her expertise includes stamp duty, land tax, foreign surcharges, windfalls gains tax, payroll tax and property tax. Nicola is also the Chair of the State Taxes Committee at the Law Institute of Victoria and am a member of the State Taxes Consultative Council.

Andrew de Wijn has been a barrister for 11 years, practising exclusively in tax matters. As well as appearing in courts and tribunals, Andrew provides technical tax advice to clients and assists in dealing with the ATO, particularly in relation to ruling requests and objections as well as settlement negotiations. Before coming to the Bar, Andrew worked for 8 years as a solicitor with Greenwoods & Freehills.

Fiona Dillon, CTA, is the ATO's Chief Tax Counsel, accountable for the ATO's public advice and guidance, litigation, and resolving the ATO's most significant tax technical issues. Fiona previously served as Minister-Counsellor (Taxation) in the Australian delegation to the OECD based in Paris and spent a number of years in private practice. Fiona is an admitted Australian legal tax practitioner and holds a Bachelor of Commerce, Bachelor of Laws with Honours and a Master of Taxation.

Michael Flynn KC, CTA (Life), is a Barrister at Owen Dixon Chambers West, specialising in taxation, and was National President of The Tax Institute in 2014. Michael has appeared in many leading taxation cases in the Federal Court and the High Court and has been a member of various committees of The Tax Institute over the past 25 years.

Karen Goodfellow, CTA, is an experienced tax professional. She is a consultant, author and presenter with extensive experience in the tax advising and education (CPD/CPE) space. As the founder and operator of two successful tax training businesses Karen has detailed knowledge of Australia's federal tax system. Karen's extensive experience providing tax advice and training gives

her an excellent understanding of the most pressing issues facing tax practitioners such as CGT roll-overs, the Small business CGT concessions, the CGT main residence exemption, taxation of trusts and taxation of companies. Karen is the owner and principal of Goodfellow Tax Advisory Pty Ltd, providing specialist tax consulting services and training to accountants, lawyers and other advisors to SMEs and family groups.

Tim Grace is a member of the Victorian Bar, practising in revenue law and specialising in property taxes. Tim has an active advice and litigation practice and has appeared in a number of State tax cases at VCAT, in the Supreme Court, the Court of Appeal and the High Court, as well as in interstate Courts and Tribunals.

Sukvinder Heyer has a unique blend of chemical engineering and legal expertise and has been advising on the R&D tax incentive to a diverse spectrum of companies for over 25 years. Sukvinder has a passion for innovation and excels in recognizing and defining the core R&D undertakings that drive innovation within organisations. This passion extends to contributing to the discussion on the policy areas of innovation support, as well as the administration of the program.

Presenters

Andrew Henshaw, CTA, acts for a diverse range of private businesses, high net-worth individuals and family groups. He specialises in business structuring, tax disputes and complex tax issues. Andrew has been a Director of Velocity Legal since the firm was founded in 2016 and was appointed Managing Director on 1 July 2021. He is passionate about leading by example, getting wins for his clients and solving difficult legal issues. Andrew is a Chartered Tax Advisor with the Tax Institute. He is an active contributor in the tax community, forums including the Tax Institute, the Institute of Public Accountants, CPA Australia, the Television Education Network, Tax Nuggets, Legalwise and TaxTalks.

Ed Hewings is a technologist focusing on the intersection of Tax and Digitisation. Having started out practising corporate tax, and achieved his CA and ITP qualifications, with a scientific background he moved into technology, and works across the spectrum of tax practitioners within KPMG to deliver technology focused solutions to augment and enhance the way tax is practised. Ed is a Director in the Tax & Legal Digital Solutions team, and leads artificial intelligence initiatives within the division at KPMG Australia.

Ross Hocking is Special Counsel in the Dispute Resolution and Litigation Team at Holding Redlich. He has nearly 30 years' experience as a lawyer practicing predominantly for private and government clients in tax controversy and dispute resolution. He has advised and represented corporate and high wealth individual clients from a wide variety of sectors including, retail, financial, automotive, telecommunications, technology, advertising, property development, sports and leisure and State Government departments and agencies in their disputes with State revenue authorities, the ATO and AusIndustry. He has also represented, advised and appeared on behalf of the Commissioner of Taxation in tax disputes, FOI, debt recovery, Alternate Dispute Resolution (ADR) and litigation matters. He has significant experience in commercial litigation, Royal Commissions and administrative law.

Denise Honey, CTA, leads the International Tax Group at Pitcher Partners. She has many years of experience providing international tax, structuring and tax controversy advice to corporate and trust groups and their key stakeholders. Denise is an Accredited Tax Law Specialist with the Law Institute of Victoria, participates on a number of consultation forums and is a regular presenter at the Institute's events.



Presenters

Claire Horan is a barrister at the Victorian Bar who specialises in taxation law. She has over twelve years of experience advising on Federal and State tax disputes, including on Part IVA, transfer pricing, capital/revenue, consolidation, CFCs, CGT, R&D, GST, excise, royalties and PRRT issues. She has particular experience acting for clients in the mining/resources, financial services, technology and infrastructure sectors, advising on risk review, audit, independent review, objection, ADR and litigation processes. Claire has appeared for both taxpayers and the Commissioner of Taxation in significant tax cases in the High Court of Australia and Federal Court of Australia, as well as in Administrative Appeals Tribunal and State Court proceedings, both led and unled.

Robert James, FTI, is a tax partner with Mazars and has over 21 years of professional services experience. Robert specialises in corporate and international tax, advising ASX listed companies, foreign multinationals and privately held entities across a range of industries including manufacturing, technology, energy & resources and consulting. Working closely with companies, Robert has gained valuable insights into the decision-making processes of various corporate

groups and has helped their finance and management teams overcome challenges they have faced in difficult business conditions.

Elinor Kasapidis is the Senior Manager Tax Policy at CPA Australia. She is responsible for CPA Australia's tax policy and advocacy work, advocating on behalf of members and the public interest, and sits on a range of tax forums and committees including the ATO National Tax Liaison Group and the Tax Practitioners Board Governance and Standards Forum. Elinor joined CPA Australia after more than 15 years at the ATO where she held several executive roles in areas such as private wealth, transfer pricing, tax gap and criminal law.

Ash Khera is the Assistant Commissioner for Financial Crime Program under Fraud and Criminal Behaviours Group at the Australian Tax Office. Ash leads a compliance area of 140+ staff responsible for ensuring those committing fraud and financial crime towards the tax and superannuation system are brought to account. Through the Serious Financial crime Taskforce, Ash leads the civil response on fraud and evasion and will collaborate regularly with the Australian Federal Police and

the Australian Criminal Intelligence Commission on joint projects and initiatives. Ash has represented Australia as the subject matter expert at the 2013 International Organisation for Economic Co-operation and Development (OECD) Convention in South Korea and represented Australia at the 2023 Asia Pacific Plenary on Money Laundering in Canada. Ash was previously the Assistant Commissioner of Promoters and Tax Exploitation Program. His experience includes working with listed companies, multinationals and large private groups on tax and regulatory compliance. Prior to working with the ATO, Ash was providing tax consulting services at Deloitte, William Buck and Grant Thornton.

Alexis Kokkinos, ATI, has over 28 years' experience providing taxation advice to a large number of corporate and private clients. He leads the Pitcher Partners' national association's Tax Technical division and is heavily involved in consultation with the Australian Taxation Office and the Federal Treasury. Alexis specialises in finance, investment and trust provisions relating to MITs, corporate taxation issues particularly relating to large corporate entities, tax consolidation, and Division 7A. He is

the Chair of CPA Australia's Taxation Centre of Excellence, and a member of the Tax office's National Tax Liaison Group (NTLG). Alexis is a prior member of the Board of Taxation Advisory Panel and was involved in the review and advice provided to Government on the new Managed Investment Trust Regime, the Collective Investment Vehicle Regime, the review of the Trust Provisions, the Tax Consolidation Regime review (including the Rights to Future Income interim review) and the review of Division 7A. Alexis is a Fellow member of both the CPA and the CAANZ.

Katie Lattimore is a Senior Manager in Deloitte's Indirect Tax team, specialising in GST. Katie is a Chartered Tax Adviser and has 10 years' experience in Australia and the UK advising complex clients across a number of industries.

Angela Lee is a barrister at the Victorian Bar. She practices predominately in taxation law, acting for both taxpayers and the Commissioner of Taxation. She is a nationally accredited mediator. She is a lecturer in the GST subject at the University of Melbourne's Melbourne Law School's Masters program. Angela served as National Chair of the Law Council of Australia's Business Law Section's Tax Committee.

Presenters

Jenny Lin is an Assistant Commissioner leading Private Wealth Risk & Strategy, with responsibility for the identification, assessment, and treatment of tax risks for the privately owned and wealthy groups population. Jenny also leads the Private Wealth Adviser Strategy – a new Tax Avoidance Taskforce program focused on leveraging the influence that advisers have on privately owned and wealthy groups, and the role they play in driving voluntary compliance and improving tax performance. Jenny started her career as a policy analyst working on GST policy and law design in the Revenue Group at Treasury. She joined the ATO in 2012 and has held roles in Superannuation and Employer Obligations, Tax Counsel Network and Service Delivery.

Adrian Lovell, FTI, is the Head of Tax of the APA Group. With over 20 years of experience in professional services and listed organisations, Adrian has proven results of identifying and implementing strategic opportunities, mergers and acquisitions, satisfying regulatory obligations across Australian and international asset portfolios, and ensuring strong corporate governance. Whilst specialising in corporate and international tax, Adrian has an in-depth understanding of commercial, legal,

accounting and treasury parameters, allowing him to be a trusted advisor. Adrian is also passionate about establishing best practices, managing a diverse tax function, and motivating and mentoring teams to success.

Kaitilin Lowdon, ATI, is a special counsel in Sladen Legal's tax group. Kaitilin practices in all areas of federal taxes, with a particular focus on the taxation of trusts, corporate trust, Division 7A, distributions from foreign entities and residency matters. Kaitilin's clients include (ultra) high-net wealth individuals, family groups and business enterprises. Her strategic acumen and technical prowess allow her to offer commercially driven advice that empowers clients to make informed decisions, working with them to obtain commercial and practical outcomes. She possesses a wealth of experience across all stages of ATO reviews and audits, from initial information requests (both formal and informal) to negotiating settlements, objections, and representing clients in Part IVC proceedings at all judicial levels.

Kasey Macfarlane is an Assistant Commissioner at the Australian Taxation Office. She joined the ATO in 1999 prior to which she worked as a Chartered Accountant in private practice. Kasey is currently the assistant commissioner responsible for technical leadership and

advice for the Private Wealth market. In this role Kasey has responsibility for leading the development of public advice and guidance, implementing new measures and overseeing strategic litigation matters relevant to the private wealth market. Kasey also has carriage of the ATO's private advice service, including the provision of private binding advice and the ATO's early engagement service, for Private Wealth clients. Prior to joining Private Wealth Kasey had undertaken various Assistant Commissioner roles in Superannuation and Employer Obligations and the ATO's Tax Counsel Network. Throughout 2020 Kasey led the ATO's implementation of the Cash Flow Boost COVID stimulus measure.

Geoff Mann, CTA, is a Consultant in the Indirect Tax team, Tax and Legal, at Deloitte. He advises on indirect tax, with particular emphasis on GST, stamp duty and real property taxes. Geoff has over 30 years' experience. Geoff's broad practice enables him to consult in relation to overall tax management strategies and review programs, as well as due diligence exercises and dispute resolution/litigation.

Narelle McBride, CTA, is a Partner at PwC with over 25 years' experience advising some of Australia's largest corporate and

privately owned enterprises, comprising varying business structures such as companies, trusts, partnerships and joint ventures. Her clients conduct business across many sectors including retail, property, primary industries and energy and resources. Narelle advises on general income tax matters as well as Australian tax issues associated with restructures, acquisitions and divestments. This extends to planning, due diligence and managing ATO interactions, reviews and disputes. She also advises on internal and external restructures involving debt financing arrangements, rehabilitation projects and closure projects.

Edward Moore is a tax expert with nine years' experience in the public and private sectors. He also accepts briefs in commercial and administrative law matters. Prior to joining the Bar, Edward was a senior manager at PwC, where he focussed on cross-border mergers, acquisitions and international tax issues. He previously spent two years at Greenwoods and Herbert Smith Freehills, advising large Australian companies in the financial services and real estate industries, and advising high net worth individuals. Edward started his career working for the ATO on rulings, audits, settlement negotiations and legislative

Presenters

design and spent a year at Treasury working on the taxation of superannuation and other retirement income policies. Edward holds a law degree with first class honours from Monash University, where he also completed an honours thesis on the income tax general anti-avoidance rule. He also holds a Master of Taxation degree from Melbourne University (H2A), a Bachelor of Arts and a Diploma of Languages (German).

Cherelle Murphy is EY's Oceania, Chief Economist. Prior to EY, Cherelle was Chief economist at Austrade, helping guide Australian Government policy in trade, foreign investment and tourism. Cherelle also spent 15 years at ANZ Bank, having started her career as an economic research analyst at the Reserve Bank of Australia. She also worked as a journalist for the Australian Financial Review. Cherelle holds a Bachelor of Commerce (Hons) from Curtin University and a Master of Population Studies from Australian National University. She is a graduate of the Australian Institute of Company Directors and a member of Chief Executive Women.

Ed Ng is part of EY's International Tax and Transaction Services practice specialising in Transfer Pricing. He is

based in Melbourne, on the lands of the Wurundjeri people of the Kulin Nation. Ed specialised in transfer pricing for over 18 years, helping multinational companies on a variety of complex tax and transfer pricing issues. He has significant experience advising taxpayers on complex financial transactions, for planning purposes, documentation, APAs and controversy scenarios. Ed also has significant experience successfully dealing with the ATO in APAs, reviews and audits.

Michael O'Neill commenced the role of CEO Secretary in August 2018. Michael is a taxation lawyer with extensive public service experience, he joined the Tax Practitioners Board from the Australian Taxation Office where he was Chief Risk Officer, following senior leadership positions in investigations, advice, litigation and law reform. He also has experience in private practice. Michael holds a Master of Laws from the University of Sydney.

Justin Orders is a Director in KPMG's M&A tax practice in Australia. Justin has extensive experience advising taxpayers in the infrastructure, renewables and real property sectors, including Foreign Multi-Nationals and Australian listed and unlisted groups.

Shahzeb Panhwar is a Partner in PwC's Tax Controversy practice. Shahzeb has extensive experience in international tax, tax structuring and transfer pricing matters across a number of industries. Before joining PwC Shahzeb was an Assistant Commissioner with the ATO and had strategic oversight of a number of strategic tax risks and strategies.

Sandie Parker is the global head of tax at Canva, an Australian graphic design platform that's democratising design and empowering the world to create impactful visual communications. Sandie is also a co-chair of the Growth, Tax and Investment subcommittee of the Tech Council of Australia with a mission to make Australia the best country in the world to create and invest in tech. Sandie has spent the majority of her career immersed in international tax, thinking / learning about how to build and sustain high performing teams and recently completed an executive MBA at Monash University in Melbourne which inspired her to shift into the world of tech. "My goal as a team lead is to make the process fun and the product serious. I seek environments where we get to experiment, create MVPs and fail fast so we can iterate to create high fidelity processes. I have a desire to learn and

a bias for action and love surrounding myself with fun, continuous learners who like to get stuff done."

Catherine Pierce practises primarily in federal tax, in respect of direct and indirect taxes, and in various aspects of state tax litigation. She has appeared in the Federal Court, the High Court and the Victorian Supreme Court for the Commissioner and for taxpayers. Before joining the Bar in 2012, Catherine was employed as a solicitor in Hong Kong where she advised in respect of international financial instruments. She has also worked as an interpreter in French and Mandarin Chinese.

Joni Pirovich is the Principal of Blockchain & Digital Assets – Services + Law (BADAS*L pronounced bedazzle). She is an advocate for responsible web3 innovation, founding LawFi DAO in July 2022 to further her contribution to web3 education and responsible policy development. BADAS*L was opened in early 2021 to operate as a distributed law practice where Joni provides legal and non-legal services to a range of clients including law firms in various web3 matters spanning tax, securities and financial services, IP, labour, litigation and AML/CTF compliance. The learnings from Joni's distributed law practice

Presenters

filter through in the thousands of hours spent on policy contributions since 2018, available at <https://badasl.com/policy>. Joni was a contributor to the 2023 World Economic Forum DAO Policy Toolkit and sits on the DAO Panel for the UK Law Commission.

Craig Silverwood, FTI, is the national leader of MinterEllison's transfer pricing practice and has over 20 years of dedicated transfer pricing and international tax experience. Prior to joining MinterEllison as a Partner in 2017, Craig was a Director at EY Australia's International Tax and Transfer Pricing practice. He also spent several years as an ATO economist in the early 2000s, where he established a focus on transfer pricing and international tax matters. Craig teams closely with MinterEllison's wider corporate and tax controversy practice to advise on significant cross-border M&A deals and resolve complex international tax and transfer pricing controversy matters. This includes advising clients on transfer pricing documentation and evidentiary requirements, country-by-country reporting, FIRB reporting, unilateral and bilateral advance pricing arrangements, ATO reviews and audits and legal disputes.

Anna Skarbek is CEO of Climateworks Centre, working to develop the low carbon economy. A former banker and green policy adviser, Anna has led Climateworks since its creation in 2009, analysing emissions reduction opportunities, setting the ambition and unblocking barriers to implementation. Climateworks' independent and non-partisan approach, co-founded by The Myer Foundation and Monash University, sees Anna working with multiple federal government departments as well as state governments and large corporations along with other stakeholders including investors, and business, environment and civil society leaders. Anna was a founding board director of the Clean Energy Finance Corporation and the Carbon Market Institute, and is currently a director of the Green Building Council of Australia, the Centre for New Energy Technologies and Sentient Impact Group. She is a member of the Blueprint Institute's strategic advisory council and the Grattan Institute's energy program reference panel, and was the 2020 Mission Innovation Champion for Australia.

Barry Sullivan is a Partner in KPMG's Tax & Legal division and specialises in tax transformation, data analytics and automation. Trained as a chartered tax

advisor, Barry supports multinationals across the region transform and enhance their tax functions through technology. Barry is also driving a number of tax use cases and pilots as part of KPMG's digital solutions and AI initiatives.

Scott Treatt, CTA, CEO, The Tax Institute Scott brings a wealth of experience in tax practice, tax administration, and leadership to the role of Chief Executive Officer of The Tax Institute. Scott's career as a Chartered Tax Advisor has spanned large and mid-tier professional firms and Government in technical and leadership roles. A dedicated member of The Tax Institute for over 20 years, Scott has contributed significantly to the knowledge of members and the betterment of Australia's taxation and superannuation system overall. Scott was previously the General Manager, Tax Policy and Advocacy, at The Tax Institute, leading its tax technical team for three years. During this time, he proactively enhanced the team's capabilities, orchestrated a successful overhaul of the various committees and councils to improve the representation of our members, built strong relationships with key stakeholders across the industry, academia, and all levels of Government, and drove the Institute's growing influence in policy and advocacy circles.

He is a passionate advocate for holistic tax policy reform and is a visionary business leader known for his forward-thinking approach. A commitment to strategic cross-team collaboration, good governance, a strong dedication to member empowerment and development, and an unwavering pursuit of excellence in every aspect of the business characterises Scott's leadership style. Under Scott's guidance, The Tax Institute is poised to provide employees and members with clear guidance, adeptly turning challenges into opportunities and catalysing sustainable growth.

Simon Tisher, CTA, has been a barrister at the Victorian Bar since May 2003. Most of Simon's experience at the Bar pertains to tax matters (state and federal) and matters related to taxation: superannuation, insolvency, bankruptcy and professional indemnity claims (commonly involving tax advice). He acts for taxpayers and for the Australian Taxation Office, led and unled. Simon has been included in "Leading Tax Barristers - Victoria" in Doyles Guide every year from 2017 and in Best Lawyers (Tax Law, 2021 and 2022 editions). He is a member and past chair of The Tax Institute's State Taxes Committee and a regular presenter at tax conferences and events.

Presenters

Nick Westerink began working in the ATO after completion of his law degree. He has now worked in the Tax Office for over 40 years. The new Commissioner Rob Heferen is Nick's 6th Commissioner! Nick's career began as an assessor back in the days before self-assessment when each tax return was individually checked. Since then, he has worked in many different areas of the Tax Office including Audit, Sales Tax, Appeals & Objections, 5 years in charge of the ATO's litigation branch, 2 years on secondment at Treasury and the last 10 years in the Tax Counsel Network. The bulk of Nick's career has been working on or managing others doing litigation. He has successfully mediated many cases and been the lead ATO officer on numerous high profile tax cases in the Federal Court, the most notable probably being BBlood.

Liz Westover, FTI, is a Partner and National SMSF Leader at Deloitte. She is responsible for the firm's SMSF service offering, providing compliance and advisory services to the firm's clients. Liz has extensive experience in superannuation and has strong capabilities on the technical and practical application of superannuation and associated tax laws. She is a regular commentator on superannuation and

self-managed super funds (SMSFs) having presented and authored articles on these and related issues for many years. Liz has been involved in superannuation policy development and advocacy, regularly liaising and consulting with Government, regulators and stakeholders on technical, legislative and policy matters. She is a Fellow of The Tax Institute, Fellow Chartered Accountant, CA SMSF specialist and holds a Master of Legal Studies from the University of New South Wales and a Bachelor of Business from the University of South Australia.

Briana Witten-Ho is a corporate tax specialist, with over 25 years experience in corporate tax functions as well as consulting. Currently Briana works as Head of Taxation for Ixom, a multinational chemicals manufacturing and distribution business operating across Australia, New Zealand, Asia and USA, with ownership in Singapore. Briana's function covers income taxes, transaction taxes, regulator management and reporting. Briana is also experienced with managing the tax aspects of M&A transactions (buy- and sell-side), debt and equity capital management, regulator and dispute management.



Venue and accommodation



Park Hyatt Melbourne

1 Parliament Square Off, Parliament Pl, Melbourne VIC 3002

Overlooking St. Patrick's Cathedral, Fitzroy Gardens, and the cosmopolitan mix of Victorian and modern architecture, Park Hyatt Melbourne offers an urban oasis in the heart of the city.

Getting there

The Grand Hyatt Melbourne is approximately a 40-minute drive from Melbourne Tullamarine Airport. For those in Melbourne, the Grand Hyatt Melbourne is conveniently located near Stop #11 (Albert St/Gisborne St) on Collins Street Tram route.

Parking

There is valet parking available in the hotel from \$70 per day or below the hotel is the **Wilson Hyatt Car Park** which starts from \$22* per day if booked at least 48 hours prior. Access is via St Andrews Place. For more information on parking and pricing, please use this [link](#).

*This rate is subject to change

Accommodation

Favourable room rates have been negotiated and secured at the Park Hyatt Melbourne. A 10% discount off the best available rate of the day is bookable by calling reservations on 13 12 34 and quoting 'Events Exclusive' or promotional code **EVENT**. Please note that the 'Events Exclusive' rate is subject to availability and is not combinable with any corporate rates.

Please note that as per hotel booking conditions, all accommodation booked is non-refundable. All additional hotel incidentals, including breakfast, remain the responsibility of delegates, and individuals will be responsible for payment of the balance of their account when checking out of the hotel. Please note that extra charges may be incurred for additional guests and will be charged to individual room accounts upon checkout.



Event information

Confirmation of registration

Please note you will receive two separate emails in the form of a tax invoice at the time of payment and a confirmation email at registration completion.

Continuing Professional Development

Attendance at the conference counts for 12 hours of Continuing Professional Development with The Tax Institute.

The Tax Institute's Attendee Hub

Program information, materials (technical papers and presentations), survey forms and more will be available via The Tax Institute's virtual Attendee Hub. All delegates are encouraged to access the platform prior to the event. Technical papers and PowerPoint presentations will be available on the Attendee Hub to all participating delegates approximately five days before the event. Delegates will receive instructions on accessing the virtual Attendee Hub by email.

Delegate list

A delegate list will be included on the Attendee Hub to assist with networking. Please indicate at the time of registration if you do not want your name to be included. Alternatively, you can edit your profile visibility settings in the Virtual Attendee Hub at any time during the event.

Dress code

Business or business casual attire is suitable for the duration of the conference.

Networking function

A welcome reception will be held directly following the last session on Thursday and the Conference close networking drinks will take place at the conclusion of the conference on Friday. Both networking functions will take place at the Park Hyatt and are included in the conference registration fee for delegates. Additional tickets are available to purchase for the welcome reception for accompanying persons at a cost of \$80. Please indicate your requirements, including dietary requirements, at the time of registration.

Special dietary and accessibility requirements

Please indicate any special dietary requirements at the time of registration. Please email us with any accessibility requirements at nationalevents@taxinstitute.com.au.

Cancellation Policy

The Tax Institute reserves the right to alter, amend or cancel all or any of the arrangements contained in the program. Should a face-to-face event be cancelled due to an event beyond The Tax Institute's reasonable control including 'an act of god', 'pandemic', 'health-related event' or 'government requirements', we will endeavour to transition to an online format to deliver the event. If there is a difference in price, a credit will be provided to delegates to be used at a future event. It is a condition of acceptance of registration that an administration fee of 20% of the registration fee be charged for cancellation if you can no longer attend the event. Cancellations must be received in writing by The Tax Institute five working days prior to the event. No refund will be given for cancellations received within five working days of the event. A replacement may be nominated. If the replacement is not a member, the non-member registration fee will apply. CPD hours will be allocated to the designated attendee. The Tax Institute cannot accept responsibility for delegates' late transport arrivals or non-arrivals due to delays.

Privacy

We take your privacy seriously, and our policy can be viewed at: <https://www.taxinstitute.com.au/about-us/privacy-copyright-disclaimer>.

Enquiries

For further information regarding this event, please contact the Events Team on 1300 829 338 or nationalevents@taxinstitute.com.au.

For registration enquiries, please contact customeradmin@taxinstitute.com.au.

Registration

Registration options and inclusions

	Online access to presentations and technical papers	Morning/afternoon tea/conference lunches	Conference welcome reception and networking*
Face-to-face full registration This registration option entitles one delegate to attend the entire event.	✓	✓	✓
Day registration This registration option entitles one delegate to attend a full day of technical sessions.	✓	✓	
Employer registration This registration option allows one registration to be shared between multiple attendees from the same firm.	✓	✓	✓

*Additional tickets to the networking functions can be purchased on the registration form.

Register now!



[Register online ▶](#)

[Register via form ▶](#)
included in this brochure

Discounts

Early bird registration

All registrations received and paid on or before 23 February 2024 will be entitled to an early bird discount.

Please note: The registration fee does not include accommodation, hotel incidentals or transfers.

Group discount

Purchase four full registrations (early bird or standard) and receive a fifth full registration for free. The free fifth registration must be of equal or of less value to the four paid registrations.

This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together. For further information please contact the national events team on 1300 829 338 or nationalevents@taxinstitute.com.au.

A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

1 Registration

Please see page 24 for registration inclusions.

Full registration – 12 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before 23 February 2024	<input type="checkbox"/> \$1,700	<input type="checkbox"/> \$2,090	<input type="checkbox"/> \$2,000
Standard registration Register after 23 February 2024	<input type="checkbox"/> \$1,900	<input type="checkbox"/> \$2,290	<input type="checkbox"/> \$2,200

I understand that the registration fees do not include printed materials. Access to materials will be electronic.

Networking function

The networking function is INCLUDED in the registration fee for delegates attending the full conference.

Thursday 21 March at Park Hyatt Melbourne

- Yes, I WILL be attending the networking function OR
- No, I WILL NOT be attending the networking function
- Yes, I require additional tickets for the networking function at \$80 per person

No. x tickets at \$80 each: \$

Dietary requirements:

*Become a member and save!

Not a member of The Tax Institute yet? Sign up for membership along with your event registration and save with:

- up to **50% off membership** for the first 12 months
- member-only prices to this and future events
- free access to member-only technical resources.

Find out more about membership at taxinstitute.com.au/membership

I hereby apply for membership of The Tax Institute and declare that I am a person of good fame, integrity and character. I agree to be bound by the Constitution of The Tax Institute.

Signature:

Date of signature:

JOIN TODAY

2 Delegate contact details

Member no.:

If your member details are up-to-date, you can skip this section.

Title: Mr Mrs Miss Ms Date of birth: DD/MM/YYYY

First name:

Last name:

Position:

Company:

Address:

Suburb: State: Postcode:

Telephone: Mobile:

Email:

Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking

3 Breakout session options

Please tick the breakout sessions you would like to attend during the forum:

Thursday, 21 March 2024

- 10:30–11:30am Session 2A Session 2B
 Session 2C
- 11:30am–12:30pm Session 3A Session 3B
 Session 3C
- 1:30–2:30pm Session 4A Session 4B
 Session 4C
- 3:00–4:00pm Session 5A Session 5B
 Session 5C

Friday, 22 March 2024

- 9:00–10:00am Session 7A Session 7B
 Session 7C
- 10:00–11:00am Session 8A Session 8B
 Session 8C
- 1:30–2:30pm Session 10A Session 10B
 Session 10C
- 2:30–3:30pm Session 11A Session 11B
 Session 11C

4 Payment summary

Registration fees

\$

Additional guest tickets – Networking function – Thursday 21 March (\$80) each

\$

Total payable

\$

Please note: The Tax Institute cannot accept responsibility for delegates' late flight arrivals. Transfer costs are non-refundable and non-transferable.

5 Payment method

Please note: all registration payments must be made prior to the event, unless other arrangements have been made with The Tax Institute.

Cheque payable to The Tax Institute (in Australian dollars)

Credit card Card type: AMEX Visa MasterCard Diners

Name on card:

Card no.:

Expiry date:

Cardholder's
signature:

For our refund, cancellation and replacement policy visit taxinstitute.com.au/professional-development/event-policy.

For event enquiries, please contact the National Events Team on **1300 829 338** or nationalevents@taxinstitute.com.au

For registration enquiries, please contact customeradmin@taxinstitute.com.au

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To register

Email customeradmin@taxinstitute.com.au

Mail L37, 100 Miller Street North Sydney NSW 2060

Online taxinstitute.com.au

A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

1 Employer Ticket types

Employer tickets offer a flexible option for employers to send multiple attendees to an event. We have different options to suit you and your team.

	Classic	Plus	Premium	Tailored
Early bird on or before 23 February	\$3,250	\$4,750	\$6,250	
Standard after 23 February	\$3,450	\$4,950	\$6,450	
Best for	SME	Mid-Tier	Corporate	Large/National
Flexibility	Your choice of 20 sessions	Your choice of 40 sessions	Your choice of 60 sessions	Contact us to tailor a quote today for you and your team to attend multiple events.
Team attendance	Up to 5 attendees	Up to 10 attendees	Up to 15 attendees	
Session formats	Face-to-face	Face-to-face	Face-to-face	
Networking	2 networking passes	5 networking passes	10 networking passes	

All Employer Ticket attendees receive:

- Electronic access to download available technical papers and presentations
- Morning tea, lunch and afternoon refreshments
- CPD hours allocated according to attendee

1 session = 1 CPD hour per attendee

Session selection

- Coordinators will be contacted with a session selection form to complete on behalf of attendees, based on the Employer Ticket type selected.
- The session selection form must be completed in full to ensure proper allocation of CPD hours post-event.

1 Employer Ticket types

Promotional code:

Ticket type	Cost	No. of tickets	Sub-total
Total payable \$			

2 Delegate contact details

Member no.: If your member details are up-to-date, you can skip this section.

Title: Mr Mrs Miss Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb: State: Postcode:

Telephone: Mobile:

Email:

Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking

3 Payment method

Please note: all registration payments must be made prior to the event, unless other arrangements have been made with The Tax Institute.

- Cheque payable to The Tax Institute** (in Australian dollars)
- Credit card** Card type: AMEX Visa MasterCard Diners

Name on card:

Card no.: Expiry date:

Cardholder's signature:

For our refund, cancellation and replacement policy visit taxinstitute.com.au/professional-development/event-policy.

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