

VIC Tax Forum

20–21 March 2025

Grand Hyatt Melbourne

12 CPD hours



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

Chaya Lal, PKF, Chair, Organising Committee

Stephen Chen, CTA, MinterEllison Chair, Hot Topic Stream

Karen Goodfellow, CTA, Goodfellow Tax Law, Chair, SME Stream

Luke Imbriano, FTI, Corrs Chambers Westgarth, Chair, Corporate Stream

Megan Bishop, Piper Alderman

Adam Dimac, Hall & Wilcox Lawyers

Greg Judd, ATI, Arnold Bloch Leibler

Russell Krupp, CTA, BlueRock

Tyrone Liu, Deloitte

Archana Manapakkam, Velocity Legal

Narelle McBride, CTA, PwC

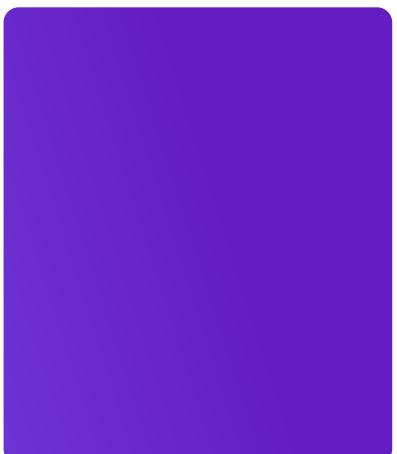
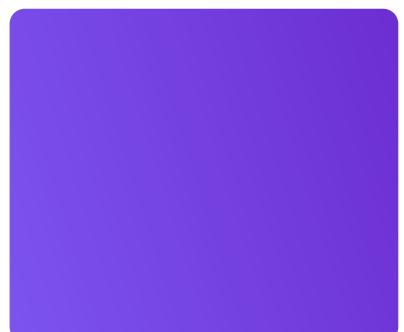
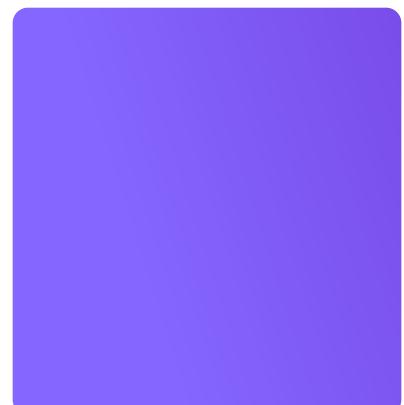
Matthew Meng, Victorian Bar

Justin Orders, KPMG

Laura Spencer, FTI, KHQ Lawyers

Sylvester Urban, KWM

Zannie Zaidi, Australian Taxation Office





Welcome

As Chair of the Victorian Tax Institute Tax Forum, it is my great pleasure to welcome you to VIC Tax Forum to be held on 20–21 March 2025. Our forum continues to be a cornerstone for thought leadership, collaboration, and innovation within the local tax community in Victoria and is a must-attend for all those working within the profession.

Featuring expert presenters, our program will cover insights into legislative developments, policy trends, and practical strategies for navigating the ever-evolving tax landscape.

Including:

- **Taxation of Trusts:** Understanding common pitfalls in the establishment and structuring of trusts, with a particular focus on issues related to trust deeds. Learn practical strategies to identify these mistakes and implement effective solutions.
- **Section 99B:** The ATO's Taxation Determination and Practical Compliance Guidelines to section 99B provide much-anticipated guidance for practitioners. This session will delve into the practical implications of these updates, focusing on when s99B applies, the clarity offered by the guidelines, and the key areas where uncertainty remains. Attendees will gain insights into proactive risk management strategies and effective approaches to navigating audits and disputes in this complex area.
- **Thin Capitalisation and DDCR:** Since the enactment of Australia's new thin capitalisation laws and debt deduction creation rule (DDCR) in April 2024, taxpayers have been navigating the practical application of these changes alongside ATO guidance. This session will focus on key interpretational challenges and provide practical examples of applying the new rules, highlighting tips and traps for managing the new rules going forward.

Beyond the sessions, the forum provides a unique platform for networking with peers and industry leaders. Whether you are here to deepen your understanding, share your expertise, or establish new professional connections, I encourage you to take full advantage of everything our forum has to offer.

A sincere thank you to all committee members, especially the stream chairs, for their dedication and hard work in delivering another outstanding program.




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



Luke Imbriano, FTI
Corrs Chambers Westgarth
Chair, Corporate Stream Sub-Committee



Karen Goodfellow, CTA
Goodfellow Tax Advisory
Chair, SME Stream Sub Committee



Stephen Chen, CTA
MinterEllison
Chair, Hot topics Stream Sub-Committee

Early bird pricing offer
Register on or before 21 February 2025 to save!

Technical program

Day 1 Thursday, 20 March 2025

Time *AEDT	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, Tim Sandow, CTA, President, The Tax Institute				
9:00-10:00am	Session 1: Housing in focus – Tax implications and opportunities Speakers: Paula Thorne, State Revenue Office Victoria Facilitator: Miranda Stewart, CTA, Melbourne Law School Housing in Victoria remains a critical issue and stands at the crossroads of economic policy, social equity, and sustainability, presenting both challenges and opportunities. This session will bring together a panel of experts to delve into the tax implications shaping the housing market. Key topics will include: <ul style="list-style-type: none">• Tax incentives for promoting affordable housing• The influence of tax policy on housing supply and demand• The evolving roles of government and private sector initiatives in addressing housing needs; and• How innovative tax strategies can serve as powerful tools to address challenges in this vital sector.				
10:00-10:30am	Morning tea				
	<table><thead><tr><th>SME Stream</th><th>Corporate Stream</th></tr></thead><tbody><tr><td>Session 2A: Payday super Speaker: Liz Westover, FTI, Deloitte Significant reforms to the way employers are required to pay their employee's superannuation are on the way. Due to commence from 1 July 2026, employers will be required to pay super guarantee for employees at the same time as salary and wages. Understanding all the expected changes and what employers will need to do to prepare is critical. In this session, Liz will cover:<ul style="list-style-type: none">• Revised employer payment and reporting obligations• Changes to SG Charge calculations, penalties and interest• Decommissioning of the Small Business Superannuation Clearing House.</td><td>Session 2B: Thin Capitalisation and DDCR – Where are we at? Speaker: Shahzeb Panhwar, ATI, Alvarez & Marsal Australia's new thin capitalisation laws and debt deduction creation rule (DDCR) were enacted in April 2024. Since that time, taxpayers have been grappling with applying the new rules in conjunction with the release of guidance material from the ATO, including in respect of interpretational issues and the ATO's compliance approach to restructures in light of the new rules. This session will cover:<ul style="list-style-type: none">• An overview of the new rules and where we are at with ATO guidance• Practical examples demonstrating the application and key Interpretational considerations of the new rules• Ongoing interpretational issues and uncertainties; and• Key tips and traps for managing the new rules going forward.</td></tr></tbody></table>	SME Stream	Corporate Stream	Session 2A: Payday super Speaker: Liz Westover, FTI, Deloitte Significant reforms to the way employers are required to pay their employee's superannuation are on the way. Due to commence from 1 July 2026, employers will be required to pay super guarantee for employees at the same time as salary and wages. Understanding all the expected changes and what employers will need to do to prepare is critical. In this session, Liz will cover: <ul style="list-style-type: none">• Revised employer payment and reporting obligations• Changes to SG Charge calculations, penalties and interest• Decommissioning of the Small Business Superannuation Clearing House.	Session 2B: Thin Capitalisation and DDCR – Where are we at? Speaker: Shahzeb Panhwar, ATI, Alvarez & Marsal Australia's new thin capitalisation laws and debt deduction creation rule (DDCR) were enacted in April 2024. Since that time, taxpayers have been grappling with applying the new rules in conjunction with the release of guidance material from the ATO, including in respect of interpretational issues and the ATO's compliance approach to restructures in light of the new rules. This session will cover: <ul style="list-style-type: none">• An overview of the new rules and where we are at with ATO guidance• Practical examples demonstrating the application and key Interpretational considerations of the new rules• Ongoing interpretational issues and uncertainties; and• Key tips and traps for managing the new rules going forward.
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Technical program

Day 1 Thursday, 20 March 2025 continued

Time *AEDT	SME Stream	Corporate Stream
11:30am-12:30pm	<p>Session 3A: Taxation of trusts – Common issues in preparing trust deeds and how to deal with them</p> <p>Speaker: Dr Philip Bender, ATI, Vic Bar</p> <p>Drafting trust deeds properly can be a complicated business and an improperly drafted trust deed can cause both issues with the proper administration of a trust and with tax. This session will examine some issues arising in trust deed drafting including, amongst others, difficulties with succession of appointors and guardians; issues with the fiduciary nature of trust officeholders; beneficiary class issues; and tax issues flowing from drafting.</p> <p>The session will also examine possible ways to address drafting issues, including drafting solutions, rectification, powers of amendment, and court applications.</p>	<p>Session 3B: Heads of Tax Panel</p> <p>Speakers: To be announced</p> <p>Join an exclusive panel of Australia's leading Heads of Tax as they delve into the latest developments, challenges, and opportunities shaping the tax landscape. This session will provide unique perspectives on key issues, including regulatory changes, the evolving global tax environment, and practical strategies for navigating complexities in tax compliance and planning.</p>
12:30-1:30pm	Lunch	



Technical program

Day 1 Thursday, 20 March 2025 continued

Time *AEDT	SME Stream	Corporate Stream
1:30 - 2:30pm	<p>Session 4A: Through the looking glass of Section 99B – Navigating complexities and understanding where the reflection fades</p> <p>Speaker: Kaitilin Lowdon, ATI, Sladen Legal</p> <p>After 40 years, the ATO's Taxation Determination and Practical Compliance Guidelines on s 99B of the Income Tax Assessment Act 1936 provides welcome guidance to practitioners. However, while it provides some useful clarity, there remains much uncertainty.</p> <p>This session will cover:</p> <ul style="list-style-type: none">• When s 99B should be considered, and the implications of it applying• What we know about the Determination and Practical Compliance Guideline• The judicial consideration of s 99B• The remaining unknowns• Proactive s 99B risk management strategies; and• Tips and tricks to managing s 99B audits and disputes.	<p>Session 4B: M&A update/Energy transition</p> <p>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>
2:30 - 3:00pm	<p>Afternoon tea</p>	
3:00-4:00pm	<p>Session 5A: Using the small business CGT concessions to restructure a small business</p> <p>Speaker: Karen Goodfellow, CTA, Goodfellow Tax Advisory</p> <p>When contemplating the restructure of a small business careful consideration needs to be given to planning for a tax effective outcome. This session will focus on the consequences and issues of choosing to apply the small business CGT concessions in Div 152 in the context of a non-arm's length related party transaction including the following and more:</p> <ul style="list-style-type: none">• Reasons to choose the small business CGT concessions over 'traditional' rollovers• Traps to be aware of when choosing to apply the small business CGT concessions to a restructure• Complying with the requirements to pay the retirement exemption amount in the absence of sale proceeds• Accessing the superannuation CGT cap• Dealing with non-CGT tax consequences of sheltering a restructure under the small business CGT concessions – depreciating assets, trading stock etc.	<p>Session 5B: Tax structuring for property investments</p> <p>Speaker: Abi Chellapen, SW Accountants & Advisors</p> <p>This presentation will provide an update and overview of current property investment structures in key asset classes, including commercial, residential, industrial as well as recent growth sectors including build to rent, data centres and student accommodation.</p> <p>This session will cover different types of structures to hold property investments, including:</p> <ul style="list-style-type: none">• Trusts<ul style="list-style-type: none">– Closely held– Wholesale unregistered MIS– Retail registered MIS• MITs/AMITs<ul style="list-style-type: none">– Partnerships– Corporate structures– Passive versus active activities– Stapled structures

Technical program

Day 1 Thursday, 20 March 2025 continued

Time *AEDT	SME Stream	Corporate Stream
4:00–5:00pm	Session 6A: Tax consequences of family breakdown Speaker: Paul Hockridge, CTA, Hockridge Advisory Marriage and relationship breakdowns can cause substantial stress for our clients. Helping them traverse the tax implications along this rocky road can alleviate some stress associated with their separation and the division of their assets. Paul will draw from his expertise and experience in navigating this course with his clients, and provide insight for practitioners to comfortably guide their clients through issues including: <ul style="list-style-type: none">• CGT and stamp duty on property settlements and transfers of business and investment assets• Capital allowance and trading stock rules• Subdivision 126-A rollovers• Tidying up loan accounts and unpaid present entitlements – dealing with debt forgiveness, accrued losses, Division 7A, and s100A (and the 'ordinary family dealings' test)• Trust cloning, splitting and other family trust issues• Child maintenance trusts• Potential professional conflicts for advisors who have previously worked for both partners, or for the business entity / group• Tax losses and unrealised tax liabilities.	Session 6B: ATO update Speaker: Fiona Knight, CTA, Australian Taxation Office This session will discuss the ATO's priority areas for large market tax administration, including current technical issues attracting the Commissioner's attention and recent case decisions affecting large corporate and multinational taxpayers.
5:00pm	Networking function	



Networking function

Join your peers and forum speakers for an evening of drinks, canapes and networking

Date: Thursday, 20 March 2025

Time: 5:00–7:00pm

Venue: Grand Hyatt

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, 21 March 2025

Time *AEDT	Session	
9:00am-10:00am	Session 7: Anti Avoidance – Panel discussion Speakers: Mia Clarebrough, VIC Bar, Angelina Lagana, CTA, Corrs Chambers Westgarth, Peter Walmsley, Australian Taxation Office Facilitator: Paul Sokolowski, CTA, Arnold Bloch Leibler This panel will explore the key strategies and insights to navigate the complexities of anti-avoidance measure and their implications for tax compliance.	
10:00-11:00am	SME Stream Session 8A: Contractors – Income splitting, PSI and Part IVA Speaker: Andrew Henshaw, CTA, Velocity Legal If one of the PSB exceptions to the PSI rules apply, can a contractor alienate income? If so, to what extent? What is the risk that the Commissioner will apply Part IVA? Did the introduction of PSI rules alter the bounds of Part IVA? What does the case law say? Following the release of PCG 2024/D2 in August, these issues have risen to the forefront of SME practitioners minds. This session will cast a critical lens over the PCG and relevant case law, and attempt to provide answers to the questions flagged!	Hot Topics Stream Session 8B: The three-body problem – Aliens, FIRB and the ATO Speakers: Intan Eow, King & Wood Mallesons, Kai-Chen Lamb, King & Wood Mallesons Foreigners would be forgiven to think that they are aliens when it comes to tax in Australia. In addition to a complex and often confusing local tax regime, foreigners need to go through the FIRB process which often can look inexplicably like a tax audit or review. Ever since the emergence of the tax conditions on FIRB approvals in 2016, the alliance between the ATO and FIRB – has been unbreakable. Special tax rules apply on the foreigners on their way in, on their way out, and all times in between. This session will look at: <ul style="list-style-type: none">• How the ATO uses the FIRB process• The trend of tax conditions in a FIRB approval• The FIRB filing fees and vacancy fees• The ATO-administered Register of Foreign Ownership of Australian Assets and• The proposed changes to the ‘taxable Australian property’ and ‘foreign resident capital gains withholding’ regime.
11:00-11:30am	Morning Tea	

Technical program

Day 2 Friday, 21 March 2025 continued

Time *AEDT	SME Stream	Hot Topic Stream
11:30am-12:30pm	Session 9A: ATO compliance focus in the private and SME sector in 2025 Speakers: Glenn Cooper, Australian Taxation Office, Pooja Nambiar, Australian Taxation Office This session will provide an in-depth look at the ATO's compliance focus for 2025, highlighting the key areas drawing their attention and the priority issues for the private and SME sector. Gain updates on tax performance programs and discover practical strategies for maintaining accurate and compliant records. Topics include: <ul style="list-style-type: none">• What is attracting the ATO's attention?• What are the priority issues for the ATO?• Tax performance programs and updates• Tips for keeping records.	Session 9B: Cases update Speakers: Khai-Yin Lim, CTA, Victorian Bar This session will discuss significant recent court decisions affecting both corporate and SME taxpayers including <i>Ierna v Commissioner of Taxation</i> [2024] FCA 592, <i>Mylan Australia Holding Pty Ltd v Commissioner of Taxation</i> (No 2) [2024] FCA 253, <i>PepsiCo Inc v Commissioner of Taxation</i> [2024] FCAFC 86, and <i>Commissioner of Taxation v Michael John Hayes Trading Pty Ltd as trustee of the MJH Trading Trust</i> [2024] FCAFC 80.
12:30-1:30pm	Session 10A: The director penalty regime – Key considerations and practical strategies Speaker: Jason Stone, PKF This session delves into the Director Penalty Notice (DPN) and its critical implications for directors. Key issues covered include: <ul style="list-style-type: none">• Current state of play in the DPN landscape• Practical steps to avoid DPNs and minimise risk; and• Options available when a DPN is issued, including small business restructuring.	Session 10B: Pillar 2 Speakers: Louise Andolfatto, Australian Taxation Office, Angus Brackenreg, Australian Taxation Office This session will discuss recently enacted Pillar 2 changes, what that means for multinationals with Australian tax obligations and key issues to be aware of as we transition into the implementation phase for the new law.



Technical program

Day 2 Friday, 21 March 2025 continued

Time *AEDT	SME Stream	Hot Topic Stream
1:30-2:30pm	Lunch	
2:30-3:30pm	<p>Session 11A: Family trust elections – Stairway to heaven or highway to hell?</p> <p>Speaker: Neil Brydges, CTA, Sladen Legal</p> <p>Family trust elections offer considerable benefits to family groups. However, the consequences for getting it wrong – family trust distribution tax at 47% plus the general interest charge – are dire. Adding to the mix is that family trust elections are an area of ATO focus.</p> <p>This session will work through some of the key issues around FTEs (and IEEs) including:</p> <ul style="list-style-type: none">• When and how to make FTEs and IEEs• Groups with more than one test individual• Deaths and relationship breakdowns• Sales of businesses (or entities) in whole or part; and• Strategies when a liability for family trust distribution tax arises.	<p>Session 11B: ChatPCG – Can you dissect the tangible from the intangible?</p> <p>Speakers: Sharon Murray, ATI, Deloitte, Melissa Spurge, Australian Taxation Office</p> <p>Since the ATO first flagged its concerns that the cross-border movement of intangible assets was being either minimised or mischaracterised in 2018, it has published a series of taxpayer alerts, draft determinations and practical compliance guidelines, including TR 2024/D1. While the ATO had an existing ruling on when amounts paid under software arrangements included a royalty, the examples that were relevant in 1993 bear little resemblance to software distribution arrangements in 2024.</p> <p>This session will cover the current state of play on the ATO's approach to identifying royalties in connection with software distribution, practical implications of the ATO's view and determining when arrangements are higher risk, as well as discuss emerging issues and trends.</p>
3:30-4:30pm	<p>Session 12A: Victorian land-based taxes update</p> <p>Speaker: Rachel O'Donnell, CTA, O'Donnell Tax Law</p> <p>This session will cover recent changes to, and cases concerning, Victorian land-based taxes including:</p> <ul style="list-style-type: none">• Duty and land tax – current issues and focus areas• Vacant residential land tax – developments, pain points and improvements• Absentee owner surcharge update• Commercial and Industrial Property Tax (Victoria's relatively new annual property tax)• Windfall gains tax update; and• Recent cases.	<p>Session 12B: Employment taxes – Where to from here?</p> <p>Speakers: Elissa Romanin, MinterEllison and Daniel Kornberg, MinterEllison</p> <p>While the dust has seemingly settled from a tumultuous few years of employment tax cases in superior Courts, the key decisions in Jamsek, Personnel Contracting and JMC have gone a long way to helping us work out where we are. So, the key question now becomes where to from here?</p> <p>Draft guidance from the ATO has consolidated much of the guidance on the independent contractor vs employee dispute. However, while the past 12 months has allowed many of us to catch our breath, there appears to be storms brewing on other fronts.</p> <p>The world of payroll tax is as murky as ever – it's always two steps forward, one step back for the taxpayer. After a big taxpayer win (for now) in the rideshare industry, State revenue authorities continue to cast doubt over other longstanding business structures. Not to mention the uncertainty for employers in varied industries.</p> <p>This session looks back at recent changes, published key guidance and examines current state of play for employment taxes, and looks forward to many of the challenges on the horizon for advisers and employers alike.</p>
4:30pm	Conference close and networking drinks	

Presenters

Dr Philip Bender, ATI, is a barrister at the Victorian Bar. He is the author of Bender's Australian Stamp Duties, published by the Tax Institute. He acts in Federal and State taxation, superannuation, and trusts and estates matters for taxpayers and revenue authorities. In the trusts area, he has acted in many taxation disputes involving trusts issues, and has acted in many trusts matters involving, amongst other topics, trust deed and will interpretation, alleged breaches of trust; trustee removal applications; judicial advice; charitable trusts; and superannuation death benefits disputes.

Neil Brydges, CTA, is a Principal in Sladen Legal's tax group. Neil primarily practises in direct taxes and GST, with a focus on the taxation of trusts, deceased estates, property, corporate tax, M&A and Division 7A. Neil has also advised extensively on cross-border taxation issues. Neil is an Accredited Specialist in Taxation Law and a member of the Tax & Revenue Law Committee with the Law Institute of Victoria, a member of the Tax Committee of the Law Council of Australia, and a Chartered Tax Adviser and member of the Dispute Resolution Technical Committee with The Tax Institute.

Mia Clarebrough is a barrister practising predominantly in tax and administrative law. Mia acts for both taxpayers and revenue authorities in State and Federal tax disputes, advises on tax investigations and alternative dispute resolution. She is a Senior Fellow of the Law Faculty at the University of Melbourne, the former deputy chair of the tax committee of the Business Law Section of the Law Council of Australia and a member of the National Tax Liaison Group.

Glenn Cooper is the Assistant Commissioner for Private Wealth (PW) Client Experience, Engagement & Assurance Services (E&AS). Glenn is responsible for reviews and complex audits undertaken across Box Hill, Dandenong, Hobart, and Melbourne. Additionally, he leads the Top 500 program, the Not for Profit compliance teams and the Research and Development compliance teams nationally. Glenn holds degrees in Commerce/Law, Accounting, and Tax.

Intan Eow specialises in public and private mergers and acquisitions, foreign investments and capital raisings, particularly cross-border transactions, foreign investments (FIRB) and security regulation. Intan frequently advises

on sensitive investment, foreign influence and interference, critical infrastructure and national security matters. Intan's unique practice provides her deep regulatory understanding into how businesses and transactions respond to geopolitics and security considerations. She has extensive experience working with foreign investors investing into Australia and Australian businesses dealing with foreign investors. Intan is a member of the Foreign Investment Committee of the Law Council of Australia and has been actively involved since its inception in early 2014.

Karen Goodfellow, CTA, 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. She is an experienced tax professional 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.

Andrew Henshaw, CTA, 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 acts for a diverse range of private businesses, high net-wealth individuals and family groups. He specialises in business structuring, tax disputes and complex tax issues. Andrew is a regular contributor and presenter in the tax community, through forums including The Tax Institute.

Daniel Kornberg is a Senior Associate in MinterEllison's tax practice and has extensive experience in advising on the income tax aspects of a diverse range of matters for both resident and non-resident individuals and companies at varying stages of their life-cycle. Daniel's work involves assisting clients on complicated issues specifically relating to mergers and acquisitions and restructures, and has extensive experience in drafting transaction

Presenters

documents. Daniel has strong technical knowledge and commercial acumen and regularly provides advice to clients on capital gains tax, tax consolidation, tax due diligence, debt/equity rules, employment tax issues, international tax and the income tax aspects of financing.

Paul Hockridge, CTA, is the Principal of Hockridge Advisory. He has worked for the ATO, a large law firm, has been a partner in medium and Big 4 chartered accounting firms and has over 30 years' experience in tax, asset protection, estate and succession planning. Paul's niches include litigation support, property development and FBT and salary packaging. Paul specialises in advising high wealth families and closely held businesses, as well as providing support for a number of accounting and law firms. Paul maintains a practicing certificate as a legal practitioner in Victoria, is a fellow of Chartered Accountants Australian and New Zealand, is senior fellow and teaches in the Masters program in the Law School at the University of Melbourne and is a chartered tax adviser. He sits on The Tax Institute's FBT and Employment Taxes Committee and was an original contributor to The Tax Institute's book, Estate and Business Succession

Planning. Perhaps Paul is best known as a regular presenter at local, State and National Tax Institute conferences.

Kai-Chen Lamb is a tax partner who practises in all areas of Australian income tax, but specialising in the Australian income tax treatment of the managed funds, superannuation, property and infrastructure. Kai-Chen has acted for significant Australian and foreign institutional investors on a number of major cross border investment, mergers and acquisitions and financing transactions. Kai-Chen has also acted in relation to the establishment, offer and restructure of a number of significant Australian and offshore fund and co-investment structures. Kai-Chen's practice encompasses not only providing clients with taxation advice, but also reviewing, preparing and negotiating the documentation necessary to give effect to those structures. Kai-Chen also has extensive experience in representing clients in the financial services industry in their dealings with the Australian Taxation Office, both in the context of applying for and obtaining rulings as well as in the context of reviews and disputes with the Australian Taxation Office.

Khai-Yin Lim, CTA, is a barrister practising primarily in tax and revenue law. Khai-Yin's tax expertise is in matters concerning corporate and SMEs in corporate tax, international tax, trust law and indirect taxes. Khai-Yin's commercial experience includes property disputes, trusts and equity.

Angelina Lagana, CTA, has over 24 years' experience specialising in tax controversy and dispute resolution. Angelina has represented high wealth individuals, large corporations and multinationals subject to Australian Taxation Office (ATO) Reviews and Audits, including the early assessment of contemporaneous evidence, audit strategy, and conducting successful negotiations leading to satisfactory resolution of ATO inquiries, reviews and audits. Angelina assists and advises her clients throughout all stages of an ATO inquiry from risk reviews, audits, objections, alternative dispute resolution, settlement and litigation. Angelina advises on effectively preparing for and resolving audits and disputes with the ATO, the preparation of evidence, application of legal professional privilege, freedom of information and regularly assists taxpayers when the ATO uses their Access powers (including onshore and

offshore formal information gathering processes that occur during ATO risk reviews and audits).

Kaitilin Lowdon, ATI, is a Principal Lawyer in Sladen Legal. She acts for a diverse range of clients, including (ultra) high net wealth individuals, family offices and business enterprises. Her expertise includes advising clients on high-profile and complex tax matters, including reviews, audits and litigation, and transactions, across a wide range of taxation matters.

Sharon Murray is a tax controversy partner at Deloitte with over 15 years' experience in corporate income tax matters. Prior to joining Deloitte, Sharon was an Assistant Commissioner at the ATO in the Tax Counsel Network and Public Groups & International segment responsible for the private and public rulings program where she provided tax certainty on large-market transactions and international tax issues. She also managed the resolution of a number of strategic technical risks. Her experience includes advising on all stages of the dispute cycle with expertise in early engagement and dispute resolution, recognising that timeliness and certainty are critical to corporate decision making.

Presenters

Pooja Nambiar is a Regional Director within the Private Wealth Business Line at the ATO. With over two decades of experience at the ATO, Pooja has expertise in working with private groups and individuals. In her current role, she leads the Engagement and Assurance Services, International Tax, and Research and Development teams in Box Hill. She holds a degree in accounting and has held several leadership positions within the ATO.

Rachel O'Donnell, CTA, of O'Donnell Tax Law, specialises in duties and land tax across all Australian states and territories, new state property taxes (such as the Victorian windfall gains tax and commercial and industrial property tax) and GST. Rachel has significant experience advising large listed and unlisted corporates, high net worth individuals and small to medium enterprises. With 20 years of experience advising on tax law, she has a broad range and depth of experiences and is very familiar with the operation and technicalities of the GST and various state and territory tax regimes, which are constantly evolving. Rachel's clients have included major international and national companies / trusts / groups in the property development, property funds management, infrastructure,

superannuation, and retirement living / aged care industries, as well as high net wealth family groups.

Elissa Romanin is a Partner in the MinterEllison tax practice, specialising in providing tax structuring, tax due diligence, contract drafting and general income and employment tax advice. Many of the matters Elissa work on involve corporate income tax issues related to mergers and acquisitions, divestments and capital reorganisations. Elissa's clients benefit from her ability to connect various tax aspects in her matters including in relation to transactions, mergers and acquisitions and tax risk management strategies. In addition to large corporates, her clients include high net wealth individuals and privately owned groups in Australia and abroad. She works with these clients to help structure their wealth ownership in a way that tax-effectively achieves their succession planning and asset protection objectives.

Melissa Spurge is an Assistant Commissioner in the ATO's Tax Counsel Network, where her responsibilities include determining the ATO view on significant tax issues, the interpretation and application of the tax law and strategic leadership of the ATO's significant litigation. Melissa has wide-

ranging experience in the delivery of public advice and guidance and development of proactive strategies to address tax compliance and risk mitigation. Prior to her current role, Melissa was responsible for the management of domestic income tax and GST risks for public and multinational businesses, and the expansion of the ATO's Public Groups Medium and Emerging engagement program under the Tax Avoidance Taskforce.

Paul Sokolowski, CTA, is a partner at Arnold Bloch Leibler, and is the national leader of the firm's taxation practice. Paul advises clients, including high-networth individuals, large private groups and public entities in tax reviews, audits, disputes and litigation, and in domestic and international transactions. Paul is a regular speaker and writer for the Tax Institute, and other organisations and publications. He actively contributes to tax policy, legislative, technical and administrative development and debate. In March 2019, Paul won The Tax Institute's 2019 Chartered Tax Advisor of the Year Award.

Jason Stone is a Partner, Restructuring, Turnaround and Insolvency, PKF Melbourne. Jason Stone is a highly experienced professional specialising in insolvency and business turnaround

since 2002. With a deep understanding of restructuring and insolvency services, Jason assists in navigating complex challenges and achieving practical solutions. His expertise includes informal workouts, investigations into voidable and fraudulent transactions, and preparing specialist reports for stakeholders.

Prof. Miranda Stewart, CTA, is a Professor at Melbourne Law School, The University of Melbourne and is an honorary Professor at the Tax and Transfer Policy Institute, Crawford School of Public Policy, Australian National University. Recent books include *Tax and Government in the 21st Century* (Cambridge University Press, 2022), *Death and Taxes* (Thomson Reuters, 2022) with Michael Flynn KC and *Income Taxation: Commentary and Materials* (Thomson Reuters, 2023) with Graeme Cooper, Michael Dirkis and Richard Vann.

Paula Thorne has been the Executive Director of the Policy, Advisory and Legal Services Division, State Revenue Office, Victoria, since 2015. Paula has extensive state taxation experience, having worked in a range of state taxation legal, policy and project / tax reform roles for over 17 years. Paula holds a Bachelor of Laws, a Diploma of Litigation, and a Master of Business Administration.

Presenters

Peter Walmsley is the Chair of the General Anti-Avoidance Rules Panel and the Deputy Chief Tax Counsel responsible for international matters at the Australian Taxation Office. In his current role, Peter provides technical and strategic guidance on many of the ATO's highest profile and most complex technical issues, law design measures and Federal and High Court litigation matters

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.



Venue and accommodation



Grand Hyatt Melbourne

123 Collins St, Melbourne VIC 3000

At Grand Hyatt Melbourne a luxurious stay awaits you, in the heart of Melbourne. The hotel features 15 inspired event spaces providing a backdrop for an abundance of experiences, options and opportunities. The hotel's function floor is equipped with the latest facilities and technology. Located prestigiously on Collins Street, surrounded by the city's high fashion and fine dining, many of Melbourne's top tourist attractions are within walking distance, including business, retail, sporting and theatre districts.

Getting there

The Grand Hyatt Melbourne is approximately a 30-minute drive from Melbourne's Tullamarine Airport. For those in Melbourne, the Grand Hyatt Melbourne is conveniently located near Stop #7 (101 Collins) on the Collins Street tram routes.

Parking

Valet parking is available at \$90 amount per day, Alternatively, the car park underneath the hotel is independently operated to the hotel. All visitors, including hotel guests, are subject to the public parking rates as listed on the provider's website. GHG Parking offers undercover 24-hour, multi-level car parking, with access via our Russell Street driveway or the car park entrance off Flinders Lane. The car park has a height restriction of 2 metres.

Accommodation

Grand Hyatt Melbourne is delighted you are attending an event at their Hotel. With luxurious accommodation, why not stay the evening, where you will enjoy an exclusive room rate of up to \$50.00 off the daily rate. For reservations, call 13 1234 (provide offer code EVENT) or book via the website, [here](#).

Please note the hotel booking and cancellation policies prior to booking in your accommodation. 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 (CPD)

Attendance at the conference counts for 12 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

This event will be accessible to all delegates via our dedicated 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.

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

Networking functions

A networking function will be held directly following the last session on Thursday and networking drinks will take place at the conclusion of the forum on Friday.

Both networking functions will take place at the Grand Hyatt and are included in the conference registration fee for delegates. Additional tickets are available to purchase for the Networking function for accompanying persons at a cost of \$80. Please indicate your requirements, including dietary requirements, at the time of registration.

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. 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 inclusions

	Online access to presentations and technical papers	Morning/afternoon tea/Forum lunches	Networking function and networking drinks*
Face-to-face Full registration This registration option entitles one delegate to attend the entire event.	✓	✓	✓
Employer registration This registration option allows one registration to be shared between multiple attendees from the same firm.	✓	✓	

*Additional tickets to the Networking function can be purchased on the registration form.

Discounts

Early bird registration

All registrations received and paid on or before 21 February 2025 will be entitled to an early bird discount.

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

Group discounts

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.

Register now!



[Register online ▶](#)

[Register via form ▶](#)

included in this brochure



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 17 for registration inclusions.

Full registration – 12 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before 21 February 2025	<input type="checkbox"/> \$1,695	<input type="checkbox"/> \$2,085	<input type="checkbox"/> \$1,995
Standard registration Register after 21 February 2025	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$2,285	<input type="checkbox"/> \$2,195

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

Networking function

The closing networking drinks are INCLUDED in the registration fee for delegates attending the full Intensive.

20 March 2025 at the Grand Hyatt, Melbourne

Yes, I WILL be attending the closing networking drinks OR
 No, I WILL NOT be attending the closing networking drinks
 Yes, I require additional tickets for the closing networking drinks 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 over \$220 on Affiliate membership for the first 12 months
- access member-only prices to this and future events
- access all 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:

DD/MM/YYYY

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, 20 March 2025

10:30-11:30am	<input type="checkbox"/> Session 2A	<input type="checkbox"/> Session 2B	10:00-11:00am	<input type="checkbox"/> Session 8A	<input type="checkbox"/> Session 8B
11:30am-12:30pm	<input type="checkbox"/> Session 3A	<input type="checkbox"/> Session 3B	11:30am-12:30pm	<input type="checkbox"/> Session 9A	<input type="checkbox"/> Session 9B
1:30-2:30pm	<input type="checkbox"/> Session 4A	<input type="checkbox"/> Session 4B	12:30-1:30pm	<input type="checkbox"/> Session 10A	<input type="checkbox"/> Session 10B
3:00-4:00pm	<input type="checkbox"/> Session 5A	<input type="checkbox"/> Session 5B	2:30-3:30pm	<input type="checkbox"/> Session 11A	<input type="checkbox"/> Session 11B
4:00-5:00pm	<input type="checkbox"/> Session 6A	<input type="checkbox"/> Session 6B	3:30-4:30pm	<input type="checkbox"/> Session 12A	<input type="checkbox"/> Session 12B

Friday, 21 March 2025

4 Payment summary

Registration fees

\$

Additional guest tickets – Networking function (\$80)

\$

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: MM/YY

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

Collection notice: The Tax Institute (TTI) complies with its obligations under the Privacy Act 1988 (Cth) with respect to how it handles personal information. For information on how TTI collects, uses, holds and discloses personal information, please see its privacy policy at www.taxinstitute.com.au. [You can also request TTI's consultants to provide you with a copy of TTI Privacy Policy.] By submitting your application to TTI, you confirm that you have read TTI's Privacy Policy and you consent to your personal information being collected, used and held by TTI and disclosed to third parties in accordance with TTI's Privacy Policy.

To register

Email customeradmin@taxinstitute.com.au

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

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 21 February	\$3,250	\$4,750	\$6,250	
Standard after 21 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
<input type="checkbox"/> Classic			
<input type="checkbox"/> Plus			
<input type="checkbox"/> Premium			
Total payable \$			

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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 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: MM/YY

Cardholder's signature:

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

To register

Email customeradmin@taxinstitute.com.au

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au

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taxinstitute.com.au