

# WA Tax Forum

13–14 March 2025

Pan Pacific Perth

12 CPD hours

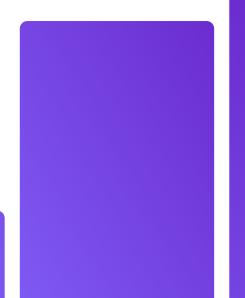


### The Tax Institute gratefully acknowledges the generous assistance of members of the Organising Committee:

Billy-Jo Famlonga, FTI, Famlonga Business Services (Co-Chair) Modiesha Stephens, CTA, MS Legal (Co-Chair) Gaurav Chitnis, CTA, HLB Mann Judd Mike Cooper CTA, Australian Taxation Office Tracey Dunn, EY Gino Franco, CTA, Duncan McPhail Yikai Hoe, CTA, Provident Lawyers Alan Krawitz, CTA, Smailes Krawitz Annette Morgan, CTA, Curtin University Rachael Munro, CTA, Alvarez & Marsal Louise Van Wyk, FTI, Herbert Smith Freehills

### Proudly supported by:









### Welcome

On behalf of the Organising Committee, we are excited to invite you to the 2025 WA Tax Forum, to be held on March 13–14 at the newly remodelled Pan Pacific Hotel. As WA's flagship CPD event for tax professionals, the Forum promises insightful presentations, expert-led discussions, and networking opportunities designed to enhance both knowledge and connection.

The WA Tax Forum is WA's most comprehensive CPD event, delivering critical updates on the latest tax developments and emerging issues across both corporate and SME markets. This year's program featuring an exceptional lineup of speakers, including Tax Institute's Robyn Jacobson, CTA, Ron Jorgensen, CTA, Tasmanian Bar and Paul Sokolowski, CTA, Arnold Bloch Liebler along with WA's top tax professionals and insights.

Some of the highlights of this year's program include:

- A plethora of the latest technical insight from our industry leaders. From the latest case updates, residency issues and generational wealth transfer to audit preparation and navigating a restructure, attendees are in for a technical treat.
- An exclusive lunchtime update from the Inspector General of Taxation & Taxation Ombudsman, Ruth Owen
- An opportunity to take a deep dive with Robyn Jacobson, CTA, into the recent TPB changes and the real impact on practitioners in a closed room environment; and
- An interactive panel session exploring how digital transformation is reshaping tax practice and what it means for you.

This year's Forum also provides ample opportunity to connect and collaborate with colleagues from across the state in a welcoming and dynamic environment. Join us to advance your expertise, engage with the future of tax, and build valuable relationships with peers.

Register now to secure your place at this premier event. We are look forward to seeing you and your team there and sharing a toast at the networking function.



Billy-Jo Famlonga, FTI Co-chair, Conference Organising Committee



*M₂SS\_\_\_\_* Modiesha Stepl

Modiesha Stephens, CTA Co-chair, Conference Organising Committee

Early bird pricing offer Register on or before 14 February 2025 to save!

Day 1Thursday, 13 March 2025

| Time AWST     | Session   |  |  |  |  |
|---------------|---|--|--|--|--|
| From 8:00am   | Registration  |  |  |  |  |
| 9:00-9:15am   | Welcome and President's address<br>Speaker: Modiesha Stephens, CTA, Co-Chair, Forum Organising Committee, Tim Sandow, CTA, President, The Tax Institute   |  |  |  |  |
| 9:15-10:00am  | Session 1: Walter Gianotti Memorial Address<br>Speaker: Dr Julianne Jacques KC, CTA, Victorian Bar  |  |  |  |  |
|               | Walter Gianotti was respected within the ATO and the tax profession for his ability to work co-operatively and find common ground. The Walter Gianotti memorial address honours Walter's memory by showcasing the ways in which the ATO and the profession work together as joint stewards of Australia's Tax and Superannuation systems. |  |  |  |  |
| 10:00-10:30am | Morning tea   |  |  |  |  |
| 10:30-11:30am | Session 2A: Personal services income – The current landscape<br>Speaker: Ben Macpherson, CTA, Pitcher Partners  | Session 2B: Corporate tax residency – Do we care, should we care?<br>Speakers: Mat Chamberlain, CTA, EY, Andrew James, EY                                |  |  |  |
|               | The ATO's recently released Draft Practical Compliance Guideline PCG 2024/D2 highlights the ATO's continued focus on the alienation of personal services  | This interactive session will focus on the concept and impact of corporate tax residency in Australia from both a corporation's law and tax perspective. |  |  |  |
|               | income.   | During the session attendees will be:  |  |  |  |
|               | This session will consider:   | <ul> <li>Brought up to speed on recent development and "current state"</li> </ul>  |  |  |  |
|               | <ul> <li>A brief history of personal services income rules and the evolution of relevant<br/>case law</li> </ul>  | <ul> <li>Informed as to what lessons have been learnt in the last 12 months and what<br/>we can expect going forward; and</li> </ul>                     |  |  |  |
|               | PSI vs PSB  | <ul> <li>Guided through a discussion of the "so what" i.e. what are the practical,</li> </ul>  |  |  |  |
|               | <ul> <li>ATO guidance on professional services firms; and</li> <li>Draft PCG 2024/D2.</li> </ul>  | material and/or adverse implications for Australian multinationals, their owners and officers.   |  |  |  |

Day 1 Thursday, 13 March 2025 continued

| Time AWST                                | Session   |   |  |
|--|---|---|--|
| 11:30am-12:30pm                          | Session 3A: Home and away – The tax residency dilemma<br>Speakers: Daniel Taborsky, CTA, Birchstone Tax Law, Shivani Jethwa, Birchstone<br>Tax Law<br>Residency changes can create unexpected and material tax implications   | Session 3B: The new debt deduction creation rules and the surprising ways<br>taxpayers may be caught<br>Speaker: Natasha McCarthy, KPMG<br>This session will give an overview of how the new debt deduction creation rules                                  |  |
|  | for clients and their related entities. During this session, we'll delve into the increasingly common scenarios of Australian residents moving abroad, as well as non-residents moving (or returning) to Australia.   | <ul> <li>(DDCR) work and how taxpayers may be unexpectedly denied deductions. To assis<br/>in identifying taxpayers who may be caught, this session will also explore:</li> <li>Examples of when the DDCR will apply and what the exclusions are</li> </ul> |  |
|  | Using case studies, this session will work through issues including:  | <ul> <li>How purely domestic debt arrangements can be caught</li> </ul>   |  |
|  | <ul> <li>The tax impact of change to residency status</li> <li>Other tax considerations; and</li> <li>Non-tax issues to be mindful of.</li> </ul>   | <ul> <li>How entities which are not subject to the thin capitalisation rules may still be<br/>subject to the DDCR</li> <li>The specific anti-avoidance rule; and</li> </ul>   |  |
|  |   | • ATO guidance on the rules and the risks for restructures in response to the rules   |  |
| 12:30–1:30pm<br>(session from<br>1:00pm) | <ul> <li>Lunch &amp; Session 4: Inspector-General of Taxation and Taxation Ombudsman update</li> <li>Speaker: Ruth Owen CBE GAICD, Inspector-General of Taxation and Taxation Ombudsman</li> <li>In this session, delegates will hear from the Inspector-General on her priorities, having taken on the role in July 2024, and her perspective on improving the integrity and health of tax administration. There will be an opportunity for questions and issues to be raised with the Inspector-General.</li> <li>Key topics include:</li> <li>The role of the Inspector-General</li> <li>Priorities and hot topics for systemic reviews of tax administration; and</li> <li>A perspective on fairness and good administration in tax.</li> </ul> |   |  |
|  | · · ·   |   |  |
| 1:30-2:30pm                              | · · ·   | Revenue audits and reviews  |  |
| :30-2:30pm                               | <ul> <li>A perspective on fairness and good administration in tax.</li> <li>Session 5: Navigating the tax minefield – Strategies to prepare for ATO and State</li> </ul>  | ases even invite, ATO and state tax reviews. The discussion will cover essential  |  |
| :30-2:30pm                               | <ul> <li>A perspective on fairness and good administration in tax.</li> <li>Session 5: Navigating the tax minefield – Strategies to prepare for ATO and State<br/>Speaker: Andrew Giorgi, FTI, Smailes Krawitz</li> <li>This session will explore how taxpayers and advisors can prepare for, and in some c<br/>steps and strategies across the full compliance lifecycle, from the planning stage to<br/>Key topics include:</li> </ul>  | ases even invite, ATO and state tax reviews. The discussion will cover essential the end of the review period and beyond.   |  |
| l:30-2:30pm                              | <ul> <li>A perspective on fairness and good administration in tax.</li> <li>Session 5: Navigating the tax minefield – Strategies to prepare for ATO and State Speaker: Andrew Giorgi, FTI, Smailes Krawitz</li> <li>This session will explore how taxpayers and advisors can prepare for, and in some c steps and strategies across the full compliance lifecycle, from the planning stage to Key topics include:</li> <li>A sequential consideration of various tax and commercial aspects arising from prepare</li> </ul>   | ases even invite, ATO and state tax reviews. The discussion will cover essential the end of the review period and beyond.   |  |
| 1:30–2:30pm                              | <ul> <li>A perspective on fairness and good administration in tax.</li> <li>Session 5: Navigating the tax minefield - Strategies to prepare for ATO and State Speaker: Andrew Giorgi, FTI, Smailes Krawitz</li> <li>This session will explore how taxpayers and advisors can prepare for, and in some c steps and strategies across the full compliance lifecycle, from the planning stage to Key topics include:         <ul> <li>A sequential consideration of various tax and commercial aspects arising from properties for recording and creating contemporaneous, appropriate evidence</li> </ul> </li> </ul>   | ases even invite, ATO and state tax reviews. The discussion will cover essential the end of the review period and beyond.   |  |
| 1:30–2:30pm                              | <ul> <li>A perspective on fairness and good administration in tax.</li> <li>Session 5: Navigating the tax minefield – Strategies to prepare for ATO and State Speaker: Andrew Giorgi, FTI, Smailes Krawitz</li> <li>This session will explore how taxpayers and advisors can prepare for, and in some c steps and strategies across the full compliance lifecycle, from the planning stage to Key topics include:</li> <li>A sequential consideration of various tax and commercial aspects arising from prepare</li> </ul>   | ases even invite, ATO and state tax reviews. The discussion will cover essential the end of the review period and beyond.   |  |

### Day 1 Thursday, 13 March 2025 continued

| Time AWST   | Session  |
|-------------|--|
| 2:30-3:00pm | Afternoon tea  |
| 3:00-4:00pm | Session 6: Dealing with blunders in earlier years  |
|             | Speaker: Paul Sokolowski, CTA, Arnold Bloch Liebler  |
|             | This session will discuss how to deal with issues discovered when taking on new clients and the discovery of prior year issues with existing clients. It will look at: |
|             | Taxpayer's obligation on the discovery of a prior error  |
|             | The Tax Practitioner's obligation on discovery of the taxpayer error   |
|             | - The Accountant's Obligation  |
|             | <ul> <li>The Tax Agent's Obligation</li> </ul>   |
|             | – The Lawyer's Obligation; and   |
|             | – Do these obligations change due to size or nature of the error?  |
|             | The company and the error  |
|             | <ul> <li>The Director's obligation</li> </ul>  |
|             | <ul> <li>The employee's obligation</li> </ul>  |
|             | – Ethics   |
|             | <ul> <li>Waiting out the amendment period and how to deal with requests for extension from the regulator.</li> </ul>   |
|             | Voluntary disclosure and the impact on administrative penalties; and   |
|             | Does criminal law impact on any obligations to report.   |



| Day 1       | Thursday, 13 March 2025 continued Session   |  |  |  |
|-------------|---|--|--|--|
| Time AWST   |   |  |  |  |
| 4:00-4:45pm | Session 7: The current state of play with TASA and TPB – A panel session<br>Speakers: Robyn Jacobson, CTA, The Tax Institute, Tracey Dunn, EY, Tim Sandow, CTA, BDO   |  |  |  |
|             | Substantial changes have recently been made to the Tax Agent Services (Code of Professional Conduct) Determination 2024 (Determination) as a result of extensive advocacy efforts by The Tax Institute and other professional associations (Joint Bodies).  |  |  |  |
|             | While the changes to the Determination broadly address the key concerns raised by the Joint Bodies, the latest round of changes still adds a considerable compliance burden and a range of uncertainties for all registered tax practitioners.  |  |  |  |
|             | This expert panel will discuss the latest changes to help you navigate your new obligations. The panel will also consider the International Ethical Standards Board for Accountants (IESBA) new global standard on ethical considerations in tax planning and related services which applies from 1 July 2025.                            |  |  |  |
|             | The session will cover:   |  |  |  |
|             | <ul> <li>The latest changes to your Code of Professional Conduct obligations</li> <li>When the changes apply</li> <li>How practitioners can comply with their new obligations</li> <li>How the Tax Practitioners Board, as regulator, will administer the new law; and</li> <li>The focus of Tax and Ethics at a global level.</li> </ul> |  |  |  |
|             | This session will be a 'closed room' session and will not be recorded.  |  |  |  |



Thursday, 13 March 2025 continued Day 1 Time AWST Session 4:45-5:30pm Bonus Session: Bendel decision – is this the final word? Speakers: Fiona Dillon, CTA, Australian Taxation Office, Tracey Dunn, CTA, EY, Robyn Jacobson, CTA, The Tax Institute, Paul Sokolowski, CTA, Arnold Bloch Liebler The conundrum of whether an unpaid present entitlement (UPE) is a loan for Division 7A purposes has plaqued the tax profession for 16 years. Now the Full Federal Court has decided in a landmark case, Commissioner of Taxation v Bendel [2025] FCAFC 15 (Bendel), that the UPE of a corporate beneficiary of a trust is not a loan for Division 7A purposes. This decision has wide-sweeping implications for taxpayers, tax professionals and the ATO, as we digest what this means for all stakeholders. In this bonus panel session with Paul Sokolowski, CTA, who represented the taxpayer in the Bendel appeal, and Fiona Dillon CTA who will provide the ATO's perspective, the panel will discuss: • What does the decision sav? What the decision means for taxpayers • Potential next steps: - Will the Commissioner seek special leave to appeal the decision to the High Court? - Will there be a legislative amendment?

- What should taxpayers do in respect of past UPEs that have been treated as loans; and
- What should taxpayers do with 2025 distributions if the final outcome is still unknown in June 2025.



### **Networking Function**

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

Date: Thursday, 13 March 2025

Time: From 5:30pm

Venue: Pan Pacific Perth

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

Dress: Business or business casual

Proudly supported by: SCEALES

**Day 2** Friday, 14 March 2025

| Time AWST       | Session  |  |  |  |
|-----------------|--|--|--|--|
| 9:00-10:00am    | Session 8: ATO guidance in 2025<br>Speaker: Fiona Dillon, CTA, Australian Taxation Office  |  |  |  |
|                 | Public and private rulings are a familiar part of Australia's self-assessment system.  |  |  |  |
|                 | Practical Compliance Guidelines and Law Administration Practice Statements are not rulings but are often used by the ATO.  |  |  |  |
|                 | This session addresses the relationship between PCG's and PSLA's and rulings, when and why the Commissioner will issue PCG's and PSLAs and other non-ruling documents, and what the benefits and limitations of these documents are.   |  |  |  |
| 10:00-11:00am   | Session 9: Winding-up a family trust on inter-generational wealth transfer<br>Speaker: Ron Jorgensen, CTA, Tasmanian Bar   |  |  |  |
|                 | As the founders of a trust age, they recognise their children may not be willing or able to share control of the family trust, so they decide to wind-up the family trust to simplify their financial affairs and estates. Using common examples, this presentation will consider:   |  |  |  |
|                 | <ul> <li>Family, succession, asset protection, family law protection and testator maintenance considerations on dividing the trust assets</li> <li>Legal distinction between in-kind distributions, vesting and winding-up the trust procedures</li> <li>In-kind distribution of trust properties when the number of trust properties match and don't match the number of children</li> <li>Income tax, GST and duty consequences of in-kind distribution of trust assets and on vesting the trust</li> <li>Income tax, GST and duty consequences of loan and unpaid present entitlement forgiveness on vesting the trust</li> <li>Adjusting unequal income tax and duty liabilities between the children; and</li> <li>Documenting vesting and winding-up best practice.</li> </ul> |  |  |  |
| 11:00-11:30am   | Morning tea  |  |  |  |
| 11:30am-12:30pm | Session 10: So, you've decided to restructure to a company<br>Speaker: Sean Pearce, CTA, MKT Taxation Advisors   |  |  |  |
|                 | This session will explore the key considerations and steps involved in restructuring to a company. It will discuss the motivations behind restructuring and look at the various business structures and their implications, including:   |  |  |  |
|                 | <ul> <li>The 'why' and the 'how' of restructuring to a company.</li> <li>The pros and cons of using companies rather than different structures, including discretionary trusts, hybrid structures, and other less commonly used options; and</li> <li>The potential pitfalls and specific considerations when seeking rollover relief.</li> </ul>  |  |  |  |

#### Day 2 Friday, 14 March 2025 continued Time AWST Session 12:30-1:30pm Lunch 1:30-2:30pm Session 11: Case updates Speaker: Fiona Beckett-Cooper, EY This session will review and analyse significant tax cases from the past 12 months, including Bendel, Merchant, Ierna, and Automotive Invest. It will examine the key issues raised by these decisions and consider their broader implications going forward. 2:30-4:00pm Session 12: The modern-day practitioner in the digital age - Leveraging technology to stay ahead Speakers: Billy-Jo Famlonga, FTI, Famlonga Business Services, Annabelle Lewkowski, Curtin University, Craig Seddon, Westcourt Family Business Accountants The conversation around AI and technology has shifted. No longer just a topic of future speculation, it's now about practical application and strategy. While human expertise remains irreplaceable, the question has become: How can technology elevate what we do? Set in a relaxed and engaging atmosphere, this interactive Q&A session invites you to hear from industry leaders who are shaping the future of the tax profession. Delegates will gain practical insights into leveraging technology to streamline workflows, safeguard data, and prepare for the demands of tomorrow, including: Robotic Process Automation (RPA) vs Artificial Intelligence (AI) The ethical implications of Al in professional practice Implementation and integration Cybersecurity Essentials Paper Trails vs Digital Systems • Upskilling for the future; and Managing client expectations. 4:00pm Forum Close

### **Presenters**

Fiona Beckett-Cooper leads the EY Tax Controversy practice in Western Australia. Fiona is a lawyer who joined EY in 2018 after a 21 year career at the ATO where she represented the Commissioner of Taxation in tax disputes before the Federal Court of Australia, the High Court of Australia, various State courts and Tax Tribunals. She has litigated or provided legal advice on a range of topics and has developed a deep understanding of ATO practices and expectations. Since joining EY Fiona has assisted clients in responding to ATO requests for information, negotiating with the ATO to resolve disputes as early as possible and advising clients in relation to the conduct of the litigation of tax disputes.

Mathew Chamberlain, CTA, is a partner at EY and leads the Perth International Tax Services team. A legal practitioner admitted in WA and NSW, he has more than 32 years' experience in international tax, focusing on the large multinational and corporate environments across Australia, the US, Europe, Asia-Pacific and Africa, Mathew specialises in international tax reform. foreign investment into Australia and outbound investment from Australia. A long-time member of The Tax Institute, Mathew has presented at numerous national and state conventions on international tax issues and has also

lectured on tax law at UWA and Curtin. Mathew has also led and participated in a number of government and ATO initiatives, working groups etc. on international tax law and policy issues affecting Australian inbound and outbound investment, including most recently submissions to and liaisons with government on corporate tax residency, the new thin capitalisation and debt deduction creation rules and the treatment of taxpayers in the oil and gas services and shipping industries.

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 practitioner and holds a Bachelor of Commerce, Bachelor of Laws with Honours, and a Master of Taxation.

**Tracey Dunn** is as Director with EY, Private – Tax in Perth. Tracey has a Bachelor of Business (Accounting), a Graduate Certificate in Commercial Law, a Bachelor of Laws and a Graduate Diploma in Legal Practice. Tracey was admitted as a lawyer in the Supreme Court of Western Australia in May 2022. Tracey has worked in public practice for over 20 years. Prior to commencing a career in public practice, Tracey worked in commerce in various roles. Tracey's expertise lies in providing both simple and complex tax advice to high wealth high net worth individuals, private groups, small and medium-sized businesses, and corporate entities. She has significant experience in advising on the application of FBT, Div 7A and trusts and regularly presents on taxation topics.

Billy-Jo Famlonga, FTI, is the founder and principal of Famlonga Business Services. With over 15 years' industry experience her practice focuses on taxation compliance, business structuring, succession planning, not-for-profits and providing a comprehensive suite of additional services to the SME market including specialising in business technology and process automation. Billy advises clients across a diverse range of industries, including primary production, freight and logistics, digital assets, retail and the NDIS sector. Billy holds a Graduate Diploma of Applied Tax Law and is a Fellow Member of The Tax Institute and the Institute of Public Accountants. Billy serves as the current Vice Chair of The Tax Institutes WA State Council and is actively involved in many of WA's local working groups, including Women in Tax, Emerging Leaders and Local Engagement.

Andrew Giorgi, FTI, is a tax and commercial lawyer with Smailes Krawitz. Andrew routinely acts in tax and duty audits, investigations and disputes for a wide range of clients. This includes high-value tax debt matters, protracted evidentiary disputes and tax prosecutions. Additionally, Andrew acts in private client matters including family trust and company disputes, complex estate planning and the drafting of commercial documents. Andrew was awarded a Master of Taxation Law with Distinction from the University of Western Australia.

Robyn Jacobson, CTA, is the Senior Advocate at The Tax Institute. She is an avid advocate, social media commentator, columnist, blogger, webcaster, presenter and the host of The Tax Institute's TaxVibe podcast. She is also frequently quoted in the media. In her role as Senior Advocate, Robyn champions improvements to our tax system, with a focus on SMEs and supporting practitioners. Robyn regularly consults with the Treasury, ATO and professional bodies on technical issues. including as Co-Chair of the ATO's Tax Practitioner Stewardship Group and a member of various other working groups Robyn has more than three decades in the profession, including a public practice background and more

### **Presenters**

than 20 years guiding the profession in her various roles as a professional tax trainer. Robyn is a Chartered Tax Adviser of The Tax Institute, and a Fellow of both CA ANZ and CPA Australia.

Andrew James is a manager in the Perth International Tax Services team in Perth. Andrew has more than 14 years of experience of tax experience, primarily in the UK (10+ years) and more recently in Australia. In the UK, Andrew focused on dispute resolution with the tax authorities for both domestic and international taxpayers dealing with direct and indirect tax issues. Since moving to Australia, Andrew has been focused on advising international companies on foreign investment into Australia and outbound investment from Australia with an emphasis on areas such as tax residency, thin capitalisation and debt deduction creation rules and BEPS.

Julianne Jaques KC, CTA, is a barrister specialising in taxation law and regularly appears in taxation matters in the AAT and Federal courts, including more recently in the cases of Sharpcan, Victoria Power Networks and Sole Luna. Prior to coming to the Bar, Julianne spent 10 years in private practice with a major accounting firm and a major law firm, and was senior taxation adviser to the Federal Assistant Treasurer. She is a Chartered Tax Adviser and a Chartered Accountant, and her doctoral thesis at the University of Melbourne was on the taxation of corporates. Julianne is a member of the Tax Practitioners Board and the Board of Taxation. In 2020, Julianne was awarded Chartered Tax Adviser of the Year by The Tax Institute.

Shivani Jethwa is an associate director at Birchstone Tax Law, which is a boutique law firm specialising in tax, trusts, succession and estate planning solutions for privately owned enterprises and high-net-worth individuals. Shivani specialises in advising on trust law issues as well as advising on various tax and duty issues and implementing tax effective strategies for succession planning purposes. Shivani was recognised as a rising tax star lawyer by Doyle's Guide in 2020 and a recommended lawyer by Doyle's Guide since 2022.

Ron Jorgensen, CTA, principally consults on Commonwealth and State tax laws, tax dispute resolution and compliance enforcement and specialises in trusts and trust disputes, succession and succession disputes and asset protection, business and investment structuring and tax sensitive commercial and property transactions for high wealth families, privately owned businesses and small to medium enterprises. He is a member of The Tax Institute, the Law institute of Victoria and the Law society of Tasmania. He is an Accredited Specialist in Tax Law and a member of the Tax Law Advisory Committee with the Law Institute of Victoria. He is a member of the Property and Commercial Law Committee of the Law Society of Tasmania. Ron is a Chartered Tax Advisor and a member of the State Council (Tas) and the State Taxes Committee (Tas) of The Tax Institute. He has a Master of Laws (Melb) and a Bachelor of Arts-Laws (Tas). Ron is a nationally respected tax and trusts technical writer and presenter. Ron was recognised by Doyle's Guide Leading Tax Lawyer – Victoria for 2015 to 2023 and Best Lawyers for tax law -Australia for 2021 to 2023.

Annabelle Lewkowski is a secondyear university student pursuing a double bachelor's degree in Software Development and Innovation at Curtin University, with a High Distinction average. She was awarded the Australian Defence Force Future Innovators Award for her innovation and achievements in her STEM studies. Annabelle has worked as campaign management support for the Lester Prize 2024, and is currently employed to organise the "Women in STEM" events at Presbyterian Ladies College (PLC). This event, which she founded in her final years of high school, supports girls in pursuing technology and STEM careers. She is entrepreneurial and aims to pursue a career in leading business transformation through technology.

Ben Macpherson, CTA, is an Executive Director in Pitcher Partners tax consulting team and have been working in public practice for over ten years focusing on taxation issues affecting corporate and multinational clients with an emphasis on natural resources. Ben regularly deals with issues affecting large proprietary companies and small listed companies and has experience preparing deferred tax calculations and disclosures.

Natasha McCarthy is the WA State lead for Tax and Legal at KPMG. In this role Natasha brings a practical and commercial approach to solving client's needs, improving financial outcomes, and managing risks. Natasha has over 20 years experience working with clients in a wide range of industries, including mining, oil & gas, shipping, resources services, and technology. She specializes in advising on corporate tax matters for international and domestic listed and large private groups, including tax compliance and reporting.

### **Presenters**

Ruth Owen CBE GAICD was appointed to the role of Inspector-General of Taxation and Taxation Ombudsman for a term of 5 years commencing on 15 July 2024. Ruth brings a wealth of experience in tax, public administration, complaints management and dispute resolution, having spent more than 30 years in various senior leadership positions across the public sector in Australia and the United Kingdom (UK). Ruth was previously a Director General and Tax Commissioner of His Majesty's Revenue and Customs in the UK, Head of Profession for operational delivery in the UK Civil Service and Deputy CEO of Jobcentre Plus, the UK employment service and welfare service delivery agency. In moving to Australia, Ruth joined EY Advisory as the lead partner in Human Services, providing professional services to Government and community sector clients, including publishing guidance on complaints management and supporting the National Redress Scheme for survivors of institutional child sexual abuse. Most recently, Ruth spent over three years in NSW Government, as a Deputy Secretary at Education and then leading the delivery of public sector reform in the NSW Premier's Department. Ruth was awarded the CBE in the UK for her public service in reducing unemployment during the GFC.

Sean Pearce, CTA, is a past State Councillor and WA Education Chairman of The Tax Institute. Prior to joining MKT in 1994, Sean spent 9 years in the advising and audit areas of the ATO. Since 1985, he has specialised in business and corporate tax with a particular focus on capital gains tax, business restructuring and Division 7A. Sean has been a regular presenter for the professional bodies on tax issues affecting companies and small business. He heads MKT's Accountants Network and Premium Accountants Network (PAN) which provides tax advisory and training support to over 200 accounting firms across Australia. Sean holds a Graduate Diploma in Advanced Taxation Law (University of NSW).

Tim Sandow, CTA, has over 30 years of experience as a tax professional, including 25 years in the Big 4. He provides income tax related advice to a variety of private and large public companies as well as multi-nationals. He has advised on mergers & acquisitions, tax governance, corporate tax, international tax, and employment tax issues. Tim is also the Partner leading BDO's National Tax Risk & Ethics group. Tim is the President-Elect of The Tax Institute for 2025 and is the SA representative on the National Board of The Tax Institute. He is a CTA of The Tax Institute and a Chartered Accountant Fellow.

Craig Seddon, CTA, joined Westcourt Family Business Accountants as a graduate in 2000 and has been a Director since 2009. Craig is a Fellow of the Institute of Chartered Accountants Australia and New Zealand, Craig has assisted many family businesses with their tax compliance and tax advisory requirements, including the purchase or sale of their business as well as any restructuring requirements. Craig believes that being a family's accountant is more than dealing with "a set of numbers", it is about "helping a family get the most out of their life" and understanding what is important to them. Craig is passionate about using technology to provide efficiencies within a business, so the owners and key staff can maximise their time in generating income and growing the business. Outside of Westcourt, Craig is a voluntary director of the Bendigo Community Bank Ellenbrook-Bullsbrook and Bindoon branches.

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.

Daniel Taborsky, CTA, is the managing director and founder of Birchstone Legal Group, which is a boutique law firm specialising in tax, trusts, succession and estate planning solutions for privately owned enterprises and high-net-worth individuals. Daniel advises on tax and duty issues, including acting for clients in disputes with revenue offices, and has been recognised as a leading tax lawyer by Doyle's Guide since 2020. He also assists families with tax and duty effective succession planning and advises on trust law issues. He works closely with other professionals including accountants, other lawyers, liquidators and financial advisers.

### Venue and accommodation







### Pan Pacific Perth

#### 207 Adelaide Terrace, Perth WA 6000

Experience the heartfelt warmth and hospitality that radiates through Pan Pacific Perth. The fully renovated meeting rooms and guest rooms add a sense of elevated luxury to our Perth hotel, centrally located on Adelaide Terrace and just steps away from the city's best shopping and dining attractions.

#### **Getting there**

This hotel is situated in the east end of Perth CBD, with multiple free CBD bus routes going past. Check out the TransPerth website for the best route.

The Pan Pacific Perth is approximately 12km's and a 20–30-minute drive from Perth airport. Delegates can take advantage of a plethora of travel options, including bus, train, taxi or private car.

#### Parking

Parking is available at the Pan Pacific Hotel. More information around parking options will be communicated to delegates in the lead up to the event.

#### Accommodation

Favourable room rates have been negotiated and secured at the Pan Pacific Perth. To book accommodation please follow the link: <u>Pan Pacific Accommodation</u>.

Please refer to the Pan Pacific Perth cancellation policy when booking. All hotel charges and 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.

#### Legal Practitioners with the LPBWA

The WA Tax Forum is a recognised LPBWA CPD activity. Delegates can earn up to 12 hours of CPD activity for attendance. To ensure your CPD activities are uploaded on your behalf to the LPBWA, please contact The Tax Institute post-event with your practitioner ID at <u>nationalevents@taxinstitute.com.au</u>.

#### 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 <u>nationalevents@taxinstitute.com.au</u>

#### **Networking function**

A networking function will be held directly following the last session on Thursday from 5:30pm at the Pan Pacific. The networking function is included in the conference registration fee for delegates. Additional tickets are available to purchase 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.

#### Privacy

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

#### Enquiries

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

For registration enquiries, please contact <u>customeradmin@taxinstitute.com.au</u>.

## Registration

### Registration options and inclusions

|  | Online access<br>to presentations<br>and technical<br>papers | Morning/<br>afternoon tea/<br>forum lunches | Forum<br>networking<br>function* |
|--|--|---|----------------------------------|
| Full registration<br>This registration option entitles<br>one delegate to attend the entire<br>event.  | 1  |   | 1                                |
| <b>Employer registration</b><br>This registration option allows one<br>registration to be shared between<br>multiple attendees from the same firm. | 1  |   |                                  |

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

### Discounts

#### Early bird registration

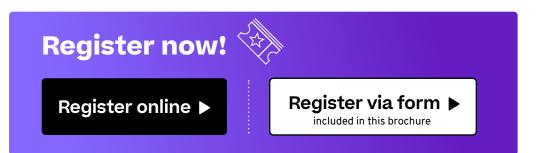
All registrations received and paid on or before Friday 14 February will be entitled to an early bird discount.

**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 <u>nationalevents@taxinstitute.com.au</u>.





### The Tax WA Tax Forum Institute Registration form

44298 WD

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 guoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

#### **1** Registration

Please see page 16 for registration inclusions.

#### Full registration - 12 CPD hours

|   | Member  | New member* | Non-member |
|---|---------|-------------|------------|
| Early bird registration<br>Register on or before 14 February 2025 | \$1,695 | \$2,085     | \$1,995    |
| Standard registration<br>Register after 14 February 2025          | \$1,895 | \$2,285     | \$2,195    |

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.

#### 13 March 2024 at the Pan Pacific Perth

- 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

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

**Dietary requirements:** 

| 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

#### \*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

YOIN TODAY 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:

#### **3** Breakout session options

**2** Delegate contact details

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

#### Thursday, 13 March 2025

10:30-11:30am Session 2A: Personal services income – The current landscape Session 2B: Corporate tax residency – Do we care, should we care?

11:30am-12.30pm Session 3A: Home and Away – The tax residency dilemma

Session 3B: The new debt deduction creation rules and the surprising ways taxpayers may be caught

#### **4** Payment summary

**5** Payment method

| Registration fees   | \$ | Please note: all registration payments must be made prior to the event, unless other arrangements have been made with The Tax Institute. |  |                    |
|---|----|--|--|--------------------|
| Additional guest tickets – Networking function (\$80)   | \$ |  | ble to The Tax Institute (in Australian dollars) | □                  |
| Total payable   | \$ | Credit card  | Card type: 🗌 AMEX 🗌 Visa 🗌 MasterCard            | □ Diners           |
| Please note: The Tax Institute cannot accept responsibility for delegates' late flight arrivals.<br>Transfer costs are non-refundable and non-transferable. |    | Name on card:  |  |                    |
|   |    | Card no.:  |  | Expiry date: MM/YY |
|   |    | Cardholder's<br>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 TTIs 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

### The TaxWA Tax Forum Employer TicketInstituteRegistration Form

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<br>on or before 14 February | \$3,250                    | \$4,750                       | \$6,250                       |                                     |  |
| Standard<br>after 14 February          | \$3,450                    | \$4,950                       | \$6,450                       |                                     |  |
| Best for                               | SME                        | Mid-Tier                      | Corporate                     | Large/National                      |  |
| Flexibility                            | Your choice of 20 sessions | Your choice of<br>40 sessions | Your choice of<br>60 sessions | <u>Contact us</u> to tailor a quote |  |
| Team attendance                        | Up to 5 attendees          | Up to 10 attendees            | Up to 15 attendees            | today for you                       |  |
| Session formats                        | Face-to-face               | Face-to-face                  | Face-to-face                  | and your team to                    |  |
| Networking                             | 2 networking<br>passes     | 5 networking<br>passes        | 10 networking<br>passes       | attend multiple<br>events.          |  |

#### 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</p>

#### 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.

Promotional code:

#### **1** Employer Ticket types

| Ticket type      | Cost | No. of tickets | Sub-total |
|------------------|------|----------------|-----------|
| Classic          |      |                |           |
| Plus             |      |                |           |
| Premium          |      |                |           |
| 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: 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.

**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 TTIs 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

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au

### The Tax Institute

### Join the conversation

- in linkedin.com/school/the-tax-institute
- f facebook.com/thetaxinstitute
  - twitter.com/taxinstituteoz

 $\mathbb{X}$ 

instagram.com/thetaxinstitute\_

### taxinstitute.com.au