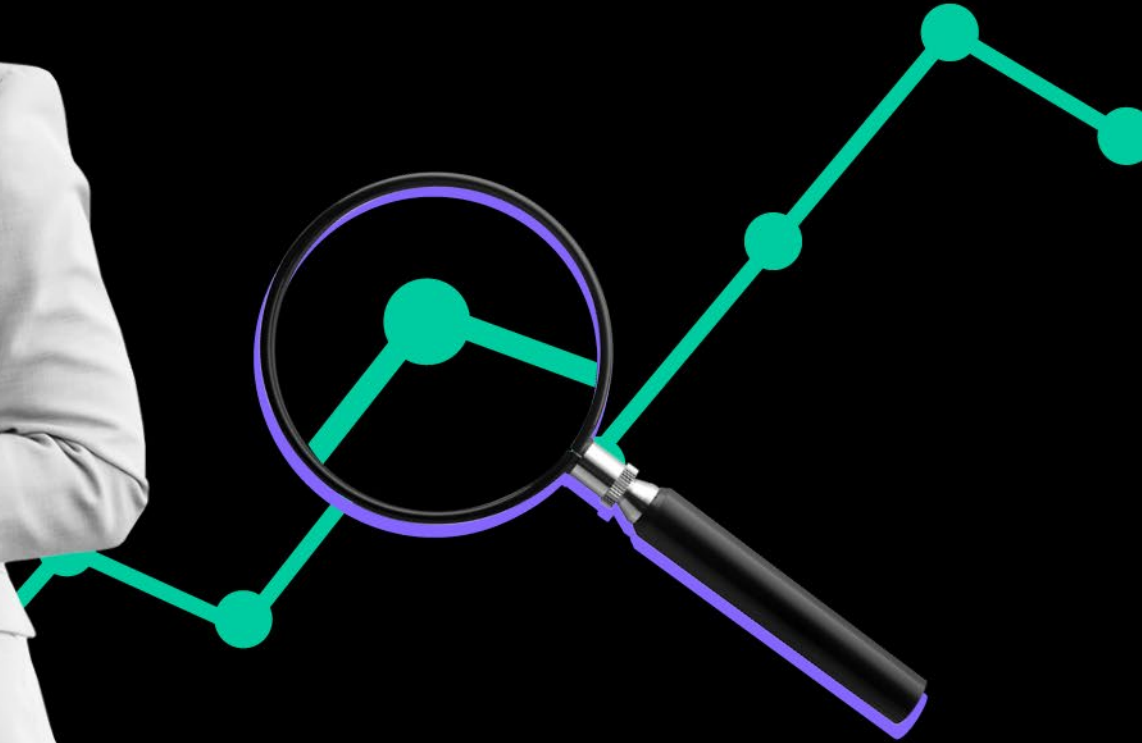


# Financial Services Taxation Conference



 26-27 Mar 2026

 CPD 12

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

Matt Osmond, CTA, Chair, PwC, Conference Organising Committee

Michael Anderson, BDO

Michele Carmody, Colonial First State

Siew-Kee Chen, CTA, Deloitte

Antony Faisandier, Australian Taxation Office

Matthew Eggins, La Trobe Financial

Simon Jenner, CTA, EY

Michael Potter, Business Council of Australia

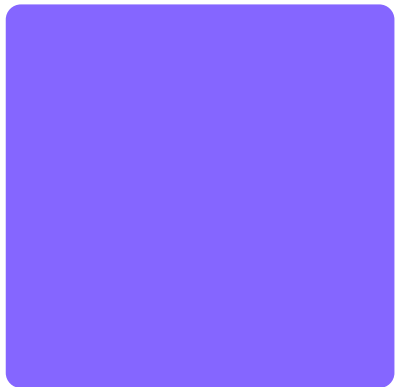
John Salvaris, CTA, KPMG

Michelle Siu, Aware Super

Nicole Stratford, Barrenjoey

Simon Tucker, CTA, SW Accountants & Advisors

Steve Whittington, Ashurst





# Welcome

On behalf of The Tax Institute and the Organising Committee, it gives me great pleasure to invite you to attend the Financial Services Taxation Conference, Australia's leading event for financial services taxation professionals, to be held from 26–27 March 2026 at Crown Sydney.

The financial services sector continues to navigate a dynamic environment shaped by evolving regulatory frameworks, increased ATO scrutiny, ongoing international tax reforms, and the implementation of the debt deduction creation rules. At the same time, technological transformation, including the rise of AI-enabled and automated tax functions are reshaping compliance and governance standards and the future of the profession. These developments overlay a complex range of tax challenges that impact business strategy, transaction structuring, and financial performance across the industry.

This year's program has been carefully curated by the Organising Committee to address the most pressing issues facing the industry today. We are delighted to bring together some of Australia's foremost thought leaders to share their technical expertise, practical insights and policy perspectives.

Across two days, the program features a strong mix of plenary and breakout sessions, allowing you to tailor your learning experience. Topics range from technical updates and case developments to broader economic and regulatory insights, ensuring comprehensive coverage of the issues shaping financial services taxation in 2026 and beyond.

Highlights of this year's program include sessions on the debt deduction creation rules, taxation and regulation of private credit, tax and regulatory insights for IDPS and bare trust operators, international tax developments, the implications of the *PepsiCo* High Court decision, and the AI-enabled tax function of the future.

In addition to the technical program, the event provides an excellent opportunity to connect and collaborate with peers, clients and colleagues from across the financial services taxation community.

We look forward to welcoming you to Crown Sydney for what promises to be an engaging and insightful event.



**Matt Osmond, CTA**  
Chair, Conference Organising Committee

**Early bird pricing offer**  
**Register on or before 27 February 2026 to save!**

# Technical program

**Day 1** Thursday, 26 March 2026

Time	Session
8:00 – 8:45am	Registration
8:45 – 9:00am	<b>Welcome and President’s address</b> Speakers: Matt Osmond, CTA, Chair, Conference Organising Committee, Tim Sandow, CTA, President, The Tax Institute
9:00 – 10:00am	<b>Session 1: Keynote address</b> Speaker: Jeremy Hirschhorn, Second Commissioner Client Engagement, Australian Taxation Office Hear first-hand from a key and influential decision maker. A session not to be missed!
10:00 – 10:30am	Morning tea
10:30 – 11:30am	<b>Session 2: Navigating the debt deduction creation rules</b> Speakers: George Bishop, Allens, Ellen Thomas, Allens This session will provide a comprehensive exploration of the Debt Deduction Creation Rules (DDCR), a key integrity measure designed to limit debt deductions arising from related-party financing arrangements. Our expert presenters will walk through the practical and technical aspects of the rule, including its interaction with existing thin capitalisation provisions and implications for financial services entities. This session will discuss: <ul style="list-style-type: none"><li>• Overview and key concepts of the DDCR;</li><li>• Practical examples and case studies illustrating application;</li><li>• Australian Taxation Office guidance and compliance approach;</li><li>• Areas of uncertainty and emerging issues; and</li><li>• Reporting, documentation and governance considerations.</li></ul>



# Technical program

**Day 1** Thursday, 26 March 2026 continued

Time	Session
11:30am-12:30pm	<p><b>Session 3A: Taxation and regulation of private credit</b> Speaker: Matt Osmond, CTA, PwC</p> <p>This session will explore the emergence and growth of private credit in Australia and discuss:</p> <ul style="list-style-type: none"><li>• The market landscape and operating models;</li><li>• The regulatory perimeter and areas of regulator focus;</li><li>• Platform and fund structures;</li><li>• Taxation considerations for originators, financiers and investors; and</li><li>• Workouts and managing distressed products.</li></ul>
	<p><b>Session 3B: Tax and regulatory insights for IDPS and bare trust operators</b> Speakers: Jessika Heynen-Brookes, CTA, KPMG, Natalie Raju, KPMG</p> <p>This session will delve into the tax and regulatory complexities facing operators of investor-directed portfolio services (IDPS), wrap platforms, nominee and bare trust arrangements. It will unpack the practical and compliance challenges in managing these structures, with a focus on characterisation, governance and reporting obligations across multiple tax regimes.</p> <p>This session will explore:</p> <ul style="list-style-type: none"><li>• Common structures and types of arrangements;</li><li>• Characterisation of arrangements and tax implications;</li><li>• Policies, governance and compliance frameworks;</li><li>• Income tax obligations for operators;</li><li>• Managing foreign income tax offsets (FITOs) and foreign tax reclaims;</li><li>• Foreign-sourced income considerations;</li><li>• GST implications for operations; and</li><li>• Other reporting and disclosure obligations.</li></ul>



# Technical program

**Day 1** Thursday, 26 March 2026 continued

Time	Session
12:30–1:30pm	Lunch
1:30–2:30pm	<p><b>Session 4A: Investment management update</b>  <b>Speakers:</b> Siew-Kee Chen, CTA, Deloitte, Ryan Kinsella, Deloitte</p> <p>This session will provide an update on the latest developments in investment management. Our speakers will examine legislative, administrative and policy changes impacting managed investment trusts, including:</p> <ul style="list-style-type: none"> <li>• Eligibility requirements (including Taxpayer Alert 2025/1 and proposed legislative changes);</li> <li>• Cross-border considerations (including the proposed expansion of the foreign resident capital gains tax regime);</li> <li>• Division 6C issues and emerging product development; and</li> <li>• Case studies and practical examples.</li> </ul>
	<p><b>Session 4B: International tax update</b>  <b>Speaker:</b> Jayde Thompson, Alvarez &amp; Marsal</p> <p>This session will deliver the latest insights on key international tax developments impacting the financial services sector. Jayde will cover the evolving international tax and transfer pricing landscape, the implementation of the Pillar Two global minimum tax rules (including changes being driven by the OECD, such as the anticipated implementation of a side-by-side system), key updates to the OECD Model Tax Convention and recent developments in relation to the hybrid mismatch rules. In addition, the session will provide practical insights on preparing for an Australian Taxation Office Justified Trust review.</p> <p>This session will explore:</p> <ul style="list-style-type: none"> <li>• Recent transfer pricing developments and ATO focus areas;</li> <li>• Implementation and implications of Pillar Two, including OECD-driven changes;</li> <li>• Updates on hybrid mismatch arrangements; and</li> <li>• Expectations and preparation for an Australian Taxation Office Justified Trust review.</li> </ul>
2:30–3:00pm	Afternoon tea
3:00–4:00pm	<p><b>Session 5A: Taxation of derivatives and similar instruments</b>  <b>Speakers:</b> Simon Jenner, CTA, EY, Anita Sharma, EY</p> <p>This session will provide a comprehensive overview of the taxation of derivatives and related financial instruments. The session will explore the different types of derivatives, repurchase and securities lending arrangements, and examine their treatment under key tax provisions. Practical examples will be used to illustrate hedging, trading and financing applications, along with discussion on potential areas for reform.</p> <p>This session will explore:</p> <ul style="list-style-type: none"> <li>• Types of derivatives, repos and securities lending arrangements;</li> <li>• Illustrative examples, including hedging, trading and financing.</li> <li>• Taxation of derivatives under ordinary provisions, Division 775, Division 230, CGT and superannuation interactions; and</li> <li>• Areas in need of reform and emerging policy considerations.</li> </ul>
	<p><b>Session 5B: Third party data governance – Meeting expectations and managing risk</b>  <b>Speakers:</b> Aaron Bennett, Australian Taxation Office, Rob Leonard, PwC</p> <p>With increasing reliance on external data sources and greater ATO scrutiny, effective third-party data governance is more important than ever.</p> <p>This session will explore:</p> <ul style="list-style-type: none"> <li>• Understanding ATO expectations and compliance requirements;</li> <li>• Managing practical challenges across listed funds, foreign investments, and corporate actions;</li> <li>• Distinguishing between related and unrelated third parties;</li> <li>• Designing practical data governance policies and control frameworks;</li> <li>• Managing the data lifecycle – from collection to security and disposal;</li> <li>• Approaches to testing and assurance; and</li> <li>• Identifying quick wins to close existing data governance gap.</li> </ul>

# Technical program

**Day 1** Thursday, 26 March 2026 continued

Time	Session
4:00 – 5:00pm	<p><b>Session 6: Cases and rulings update</b> Speakers: Bronwyn Kirkwood, Ashurst, Steve Whittington, Ashurst</p> <p>This session will look at a number of recent cases and updates of importance to the financial services industry and will consider:</p> <ul style="list-style-type: none"><li>• Relevant Australian tax case law which has been determined in the Federal Court, Full Federal Court and High Court in 2025, including an analysis of the win-loss percentage across all cases;</li><li>• Case law from other Commonwealth jurisdictions that is industry relevant and that may be persuasive in Australia; and</li><li>• Recent rulings or other guidance from the Australian Taxation Office that is of significance to the financial services industry.</li></ul>



## Welcome reception

Join your colleagues and conference speakers to raise a glass to exquisite views of Sydney Harbour, blended with the luxury of an open terrace at Crown Sydney's award-winning Rooftop Bar, CIRQ.

**Date:** Thursday 26 March 2026

**Time:** From 5:00pm

**Venue:** CIRQ Rooftop Bar – Level 26, Crown Sydney

**Price:** Inclusive for all full registration delegates  
Additional tickets are \$80 per person, see registration form for details

**Dress:** Business for business casual

# Technical program

**Day 2** Friday, 27 March 2026

Time	Session	
8:30 – 9:30am	<p><b>Session 7: Economic update</b> Speaker: Besa Deda, William Buck</p> <p>Join us for a sharp, forward-looking economic update as we unpack what’s ahead for interest rates, inflation and Australia’s growth outlook. We’ll explore how global uncertainty, shifting central-bank expectations and domestic economic momentum are shaping the path for 2026 – including what it all means for housing, business conditions and investor sentiment. This session will equip you with clear, actionable insights to navigate an environment where resilience, selectivity and disciplined decision-making matter more than ever.</p>	
9:30 – 10:30am	<p><b>Session 8A: M&amp;A update with a focus on real estate assets</b> Speaker: Sue Ann Khoo, Deloitte</p> <p>This session will provide the latest developments in mergers and acquisitions, with a particular focus on real assets.</p> <p>This session will discuss:</p> <ul style="list-style-type: none"><li>• Structuring issues;</li><li>• Due diligence;</li><li>• Buy-side and sell-side tax considerations; and</li><li>• Exit considerations (including managing tax risks and insurance).</li></ul>	<p><b>Session 8B: Red tape reduction project – Financial services perspectives for the Board of Taxation Review</b> Panellists: Mike Garrod, Suncorp Group, Andrew Mills, CTA (Life), Board of Taxation, Bronwyn Tan, BlackRock Australia Facilitator: Julie Abdalla, FTI, The Tax Institute</p> <p>In September 2025 the government announced the Board of Taxation (the Board) would review ways to reduce red tape in the tax system. By March 2026, the Board will have broadly consulted with stakeholders, received numerous submissions and will be preparing its report back to government. This facilitated panel session will explore what’s on the wish-list of financial services businesses to reduce red tape in the tax system.</p>
10:30 – 11:00am	<b>Morning tea</b>	



# Technical program

**Day 2** Friday, 27 March 2026 continued

Time	Session
11:00am–12:00pm	<p><b>Session 9: Litigation update – The application of Part IVA and the DPT</b> Speaker: Catherine Pierce SC, Chancery Chambers</p> <p>This session will examine litigation that has had implications for the operation of Part IVA and the Diverted Profits Tax (DPT). The discussion will unpack the approach to identifying a tax benefit, the role of the counterfactual, the assessment of dominant or principal purpose and commercial substance. The session will also consider the practical impact of the decision on litigation strategy, evidence, and documentation for taxpayers.</p> <p>This session will explore:</p> <ul style="list-style-type: none"><li>• Types of cases, statutory interpretation principles, evidence and litigation strategy;</li><li>• Overview of the case facts and outcomes;</li><li>• The legal framework for Part IVA and the DPT;</li><li>• Identifying a tax benefit, role of the counterfactual, principal purpose, and commercial substance;</li><li>• Implications for practice: thresholds for identifying a tax benefit, evidentiary requirements and limits on reconstruction; and</li><li>• Practical takeaways: documentation, commercial substance and boundaries of Part IVA.</li></ul>
12:00–1:00pm	<p><b>Session 10A: Taxation of dividends</b> Speaker: Michael Anderson, BDO</p> <p>This presentation will provide a comprehensive overview of the key tax issues and compliance considerations associated with dividend payments and distributions. This session will explore the perspectives of both companies and investors, the interaction of key legislative provisions and rulings, and the practical application of franking and withholding rules. The session will also include case studies illustrating current ATO focus areas.</p> <p>This session will explore:</p> <ul style="list-style-type: none"><li>• Types of cases, statutory interpretation principles, evidence and litigation strategy;</li><li>• Overview of the case facts and outcomes.</li><li>• The legal framework for Part IVA and the DPT;</li><li>• The High Court’s reasoning: identifying a tax benefit, role of the counterfactual, principal purpose, and commercial substance;</li><li>• Implications for practice: thresholds for identifying a tax benefit, evidentiary requirements and limits on reconstruction; and</li><li>• Practical takeaways: documentation, commercial substance and boundaries of Part IVA.</li></ul> <p><b>Session 10B: Managing withholding tax obligations and foreign income tax offsets</b> Speaker: John Fulton, CTA, KPMG</p> <p>This session will explore the key withholding tax (WHT) obligations for payments and distributions made to investors, as well as the interaction with double tax agreements (DTAs) and claiming foreign income tax offsets (FITOs). Through case studies and practical examples, presenter will outline common issues, available exemptions and concessions, and approaches for managing foreign tax reclaims.</p> <p>This session will explore:</p> <ul style="list-style-type: none"><li>• Key WHT obligations on payments and distributions to investors;</li><li>• Exemptions and concessions;</li><li>• Application of DTAs and FITOs; and</li><li>• Case studies and practical examples.</li></ul>

# Technical program

**Day 2** Friday, 27 March 2026 continued

Time	Session
1:00 – 2:00pm	Lunch
2:00 – 3:00pm	<p><b>Session 11: ATO current areas of focus in financial services</b> Speakers: James Campbell, Australian Taxation Office, Rhys Chalmers, Australian Taxation Office</p> <p>This session will provide an in-depth update from the ATO on selected current areas of focus within the financial services sector including:</p> <ul style="list-style-type: none"><li>• The latest on the change in definition of “debt deduction”</li><li>• Current thinking on the change in definition of “financial entity”</li><li>• Areas of concern in relation to the s128F public offer test</li><li>• An overview of the Commissioner’s approach to assessing GST apportionment methodologies, including:<ul style="list-style-type: none"><li>– the importance of a robust cost allocation process</li><li>– common errors identified by the Commissioner</li><li>– the ‘relevance’ of the Hannover decision</li><li>– practical examples</li></ul></li></ul> <p>The presenters will outline the key facts, relevant legislative and regulatory provisions, and the ATO’s concerns, observations, and recommendations. The session aims to equip participants with practical insights to enhance compliance and manage emerging risks effectively.</p>
3:00 – 4:00pm	<p><b>Session 12: The AI enabled tax function of the future</b> Panellists: Katherine Boiciuc, EY, Kelum Kumarasinghe, EY, Paul Masnick, CTA, QBE Insurance</p> <p>This forward-looking panel session will explore the transformative impact of artificial intelligence on the tax function. The panellists will separate fact from fiction, highlighting current and emerging AI use cases, practical applications, and the associated risks and challenges. The session will also examine implications for compliance, reporting, tax function design, and the broader future of the profession.</p>
4:00pm	Conference close and networking

# Presenters

**Julie Abdalla, FTI**, is the Head of Tax & Legal at The Tax Institute. Julie has practiced in the tax teams of Big 4 and top tier law firms in Sydney and Melbourne, and at an international law firm in London. She has expertise in law and policy across a broad range of taxes and industry sectors. Julie is driven to achieve holistic tax reform, and has the depth of knowledge to advocate for members and the betterment of the tax system. Julie leads the Tax Policy & Advocacy team and has oversight of The Tax Institute's National Technical and State Taxes Committees comprised of over 150 volunteers. She represents The Tax Institutes in several external forums including the ATO's National Tax Liaison Group and the Australian Treasury's Tax Treaty Advisory Panel. Julie provides strategic and technical advice to Government and other stakeholders, and has appeared as an expert witness in several Senate Committee inquiries. Julie has been recognised throughout the profession for her leadership and excellence in tax. She has been awarded a number of scholarships and awards including the International Bar Association Taxes Committee Scholarship, the Australian Lawyers Weekly 30 Under 30 Award in Tax, and a prize from the University of Oxford. Julie holds a Bachelor of Arts and a Juris Doctor from

the University of Sydney, and a Master of Laws from the University of Melbourne, part of which was completed at the University of Oxford.

**Michael Anderson** is a partner in the corporate and international tax team at BDO. Michael has more than 25 years specialist knowledge of the financial services, energy and infrastructure sectors. He provides advice on M&A transactions, including fund establishment, debt and equity raisings and new business ventures with a clear focus on helping clients strategically navigate the complexities of Australia's tax system. Before joining BDO, Michael was a Special Counsel at Greenwoods & HSF, where he provided strategic advice on and the delivery of transactions for many of Australia's leading banks and other large corporates as well as venture capital funds. Prior to that Michael was a partner for more than a decade with EY and Deloitte.

**Aaron Bennett** is the Assistant Commissioner for the Private Equity Branch in Public Groups at the ATO and is responsible for leading the ATO's Collective Investment Vehicles strategy. Prior to taking up this role, Aaron was a Senior Technical Adviser and Acting Assistant Commissioner in the ATO's Tax Counsel Network. Aaron also has engagement and assurance experience

from leading the ATO's managed investment trust assurance program, as well as policy and law design experience from his time working at Treasury.

**George Bishop** is a Managing Associate within the Allens Tax team. George is an emerging talent, specialising in income tax, and has notable experience in banking and finance transactions, M&A, international tax issues, general advisory work, infrastructure assets, restructuring and audits.

**Katherine Boiciuc** is EY Chief Technology and Innovation Officer for the Oceania region. She helps clients gain the most from innovative technology like generative AI and advanced computing. She uses her experience as a futurist to lead innovations at EY and guide EY clients on how to adopt new technologies ahead of their competitors.

**James Campbell** is a Director, leading the Banking and Finance Strategy and work program for income tax in the Public Groups business line of the ATO. James has over 20 years experience in compliance, audit, public advice and policy development with a focus on the banking and finance industry. Areas of expertise include capital management and hybrid financing, transfer pricing, branch attribution, CFC rules Part IIIB, thin capitalisation and M&A.

**Rhys Chalmers** is a Melbourne-based Director in the Public Group's GST Financial Services and Insurance Risk and Strategy team, responsible for the design and implementation of the GST FSI strategy for the Australian Taxation Office. Rhys has extensive experience and expertise in undertaking GST technical reviews of taxpayers within the financial services and insurance sectors. He is a leader in promoting consistent Australian Taxation Office GST positions, within these markets, in relation to existing and emerging GST risks. Prior to joining the Australian Taxation Office, Rhys worked as an advisor within a Big 4 firm.

**Siew-Kee Chen, CTA**, is a Partner at Deloitte. He is the Deloitte Asia Pacific Regional Tax & Legal Leader for Investment Management. Siew-Kee is recognised as a leading tax adviser in investment management. Siew-Kee has over 26 years' experience providing tax advisory services to financial services, real estate, private equity and infrastructure clients and advising throughout the entire deal life cycle, including mergers and acquisitions, due diligence, tax compliance and divestments. He delivers practical and commercial expertise to clients, drawing from his previous role as the Head of Tax of an Australian listed group. Siew-Kee has been heavily involved in the tax reform design for Management Investment Trusts, CCIVs and Financial Services.

# Presenters

**Besa Deda** is the Chief Economist at William Buck. She has built a career translating complexity into clarity. Curious by nature and driven by a passion for making economics accessible. Known for her people-first leadership and engaging communication style, Besa's strength lies in her ability to bring macroeconomic trends down to a human level; always with relevance, clarity and impact. Her career spans more than two decades in the banking and finance sector. It includes her historic appointment at St. George Bank in 2008 as the first female Chief Economist of an Australian bank. Following Westpac's merger, she was appointed Chief Economist across several brands in the Westpac Group. She's earned a reputation as a respected thought leader and trusted advisor to businesses of all sizes; from small enterprises to national institutions. Today, Besa brings that leadership and insight to William Buck, delivering context-rich analysis that helps clients make smarter, more confident decisions. She also serves as Chair of the not-for-profit organisation Australian Business Economists, where she has championed diversity, modernised operations, and expanded its reach in informing, connecting and influencing economic

and policy debate in Australia. And while many know Besa for her articulate commentary, fewer realise she's a lover of obscure facts and trivia, always ready with a surprising insight to spark conversation.

**John Fulton, CTA**, is a Partner in the Financial Services Tax practice, based in Sydney. John has more than 20 years' experience advising domestic and international financial services organisations on a range of cross border and domestic corporate tax matters. His clients include domestic and foreign banks, investment banks, fintech businesses and alternative finance providers. John has previously held advisory and group tax roles in Sydney, New York and Hong Kong. He has been actively involved in submissions to government and revenue authorities in relation to new developments in tax laws impacting financial services businesses.

**Jessika Heynen-Brookes, CTA**, is a Partner in KPMG's Financial Services tax practice in Sydney. Jessika has over 15 years' experience advising a wide range of clients in the financial services sector on issues including investments and related tax compliance, ATO interactions, and the tax aspects of

asset management products. Jessika's experience includes a number of years in-house experience at Australian financial institutions, including leading the investment tax function at a large superannuation fund.

**Simon Jenner, CTA**, is a Partner in the Financial Services Tax practice at EY, specialising in banking and capital markets. Simon has over 29 years' experience advising large corporates on a variety of tax issues, including capital management, capital raisings, mergers, acquisitions, disposals and the application of the tax consolidation regime. He has also advised extensively on the application of the taxation of financial arrangements rules.

**Sue Ann Khoo** is a Partner at Deloitte. She has 20 years of Australian corporate tax experience specialising in real property, international and M&A. Sue Ann has significant experience advising real estate investors on complex M&A transactions and providing ongoing advisory and tax compliance services. Sue Ann has advised listed REITs, unlisted funds and real estate developers on major acquisitions, disposals, financing and restructures.

**Ryan Kinsella** is an account director with Deloitte with over 15 years' experience

advising on Australian corporate and international tax matters. Ryan advises on cross-border transactions with areas of specialisation including outbound investment structuring for Australian superannuation funds and sovereign wealth funds. Ryan's specialisation is advising on Australian income tax considerations associated with fund structuring, financing, repatriation and returns and FITO planning, and exit planning. He regularly advises Australian and foreign fund managers with respect to their Australian income tax obligations regarding outbound investments in various vehicles, including corporate limited partnerships and foreign hybrid limited partnerships and foreign 'opaque' collective investment vehicles, with a view maximising tax efficiency and investor returns.

**Bronwyn Kirkwood, CTA**, is a Counsel at Ashurst in Melbourne. Bronwyn's practice is in direct tax, with an emphasis on financial services and general corporate tax issues. Bronwyn's experience covers a broad range of matters, including providing income tax advice for cross border financing, structured financing arrangements, securitisations and mergers and acquisitions.

# Presenters

**Kelum Kumarasinghe** is a Partner in the Tax Technology and Transformation practice at EY in Sydney. With over 15 years of experience, Kelum advises clients on tax operating model design, technology implementation and transformation through data and AI. He plays a key role in driving EY Tax Labs and advancing the use of AI in tax transformation.

**Rob Leonard** is a Director at PwC Australia where he owns and drive global tax technology, transformation and governance projects. Rob advise's financial institutions, tech companies and EUR industries as they seek to optimise their tax operating model for productivity and efficiency. His work centers on driving change at scale, including through the design and implementation of products and services, operating model redesign and change management.

**Paul Masnick, CTA**, has been the Group Head of Tax at QBE Insurance Group, an Australian based multinational, since 2016. He has over 25 years of experience in insurance regulation and capital, Australian and international tax policy development, capital markets and intra-group funding, international tax, structuring, tax accounting, risk

frameworks and global tax function operating models.

**Andrew Mills, CTA (Life)**, is Chair of the Financial Reporting Council Australia, Acting Chair of the Board of Tax, Principal Fellow at Melbourne University Law School and a member of the ANU's Tax and Transfer Policy Institute Advisory Board and the Executive Committee of IFA Australia Branch among other roles. Previously, Andrew was the Second Commissioner, Law Design & Practice, at the Australian Taxation Office from 2013–2019. Andrew has over 40 years' experience in taxation, including periods in the ATO, commerce and the tax profession. Andrew was a Director (Partner) at Greenwoods & Freehills for more than 20 years and managing director of the firm from 2006 to 2011. Andrew was President of The Tax Institute in 2006–2007 and is a former Governor of the Taxation Research Foundation. Andrew holds qualifications in Business and Law and is a Chartered Taxation Adviser (Life), a Fellow of CPA Australia, a Graduate member of the Australian Institute of Company Directors and a Fellow of the Governance Institute of Australia.

**Matt Osmond, CTA**, is a Partner in the financial services corporate tax

team at PwC focused on banking and financial services. He is a lawyer, chartered accountant and registered tax agent. Matt brings global and Australian insights in financial services and taxation to his corporate and international clients. Matt has over three decades of experience working with banks and financial services businesses in Australia and the UK and advises on a range of matters including taxation of derivatives, financial arrangements, dividend management and franking, funding, profit repatriation, branch taxation, tax effect accounting, asset administration, securitisation, hedging, foreign exchange transactions, leasing, commercial and consumer finance products, offshore banking units, M&A and employee share schemes.

**Natalie Raju** is a Tax Partner within the Financial Services division of KPMG, with more than 20 years' experience advising on taxation issues relevant to the funds management, custody and broader financial services industry. Natalie also has five years in-house experience with a fund manager, where she was a lead product originator and tax counsel. Natalie has a particular passion for financial product innovation and partnering with financial service

providers to ensure the correct tax outcomes.

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

**Anita Sharma** is a Director in the Financial Services ITTS practice at EY specialising in debt capital markets and cross border transactions. Anita has over 10 years of tax advisory experience with a global investment bank where she provided tax advice on the full range of investment banking products. Anita has 20 years' experience advising multinational corporations and investment funds on debt capital raisings, syndicated loan facilities and debt restructuring, mergers and acquisitions, cross border investment structures and financial products.

# Presenters

**Bronwyn Tan** is the Head of Tax in BlackRock Australia and has over 20 years of experience in financial services and tax, in both professional services firms and in commercial tax roles. In her role at BlackRock Australia she is responsible for the tax administration and compliance for all the BlackRock Australian funds and corporate entities. She is the Chair of the Tax Expert Committee of the Financial Services Council, participating in consultations affecting the managed funds industry.

**Ellen Thomas** is a tax lawyer based in Sydney. She focuses on the tax aspects of M&A and financing transactions. Ellen also has extensive experience in dealing with the Australian Taxation Office, including in relation to ruling applications, audits and dispute resolution.

**Jayde Thompson** is a Managing Director with Alvarez & Marsal Tax in Melbourne. With over 16 years of experience in corporate international taxation, Ms. Thompson is a trusted adviser to foreign investors, structuring their Australian investments and Australian corporates expanding offshore. She works closely with clients to navigate the complexities of the global tax landscape, providing expert guidance on structuring, compliance, and risk management in an ever-evolving international tax environment.

**Steve Whittington** is a partner in the direct tax practice at Ashurst. Steve advises on a wide range of tax matters, with a focus on funds, real estate acquisitions, mergers and acquisitions, and financial arrangements. His funds work is across all real estate asset classes, as well as infrastructure.



# Venue and accommodation



## Crown Sydney

1 Barangaroo Ave, Barangaroo, NSW 2000

Crown Sydney offers uncompromising design that captures the essence of its harbour side setting, highly intuitive personalised service, and the finest dining and facilities unlike anything Sydney has seen before. Located in the bustling precinct of Barangaroo, connected to sprawling parklands, laneway bars, beautiful public artworks and bay views of Sydney redefining bespoke luxury in the heart of the harbour.

## Getting there

Crown Sydney is centrally located along the Barangaroo waterfront, yet still close to the heart of Sydney. Sydney Airport is located just 15 kilometres from the hotel. The closest train station is the Wynyard stop, a 9-minute walk to Crown Sydney. The closest light rail stop is the Bridge Street stop, where the L2 and L3 run. This stop is an 11-minute walk to Crown Sydney. The closest stop is Barangaroo South on Hickson Rd, which is a 3-minute walk to Crown Sydney.

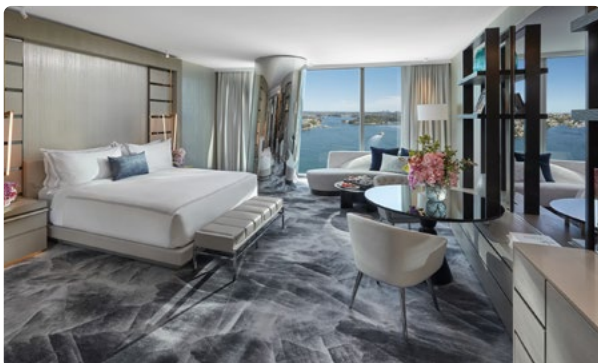
## Parking

Valet Parking is available through the hotel's Bell Desk team at the rate of \$160 per 24 hours. Alternatively, The Barangaroo Reserve car park is a 10-minute walk to Crown Sydney. We invite you to visit the website to view the most current rates and book in advance <https://www.carepark.com.au/find-a-care-park/barangaroo-reserve>. The closest Wilsons public car park is located at Barangaroo Reserve, however, please kindly be aware this parking lot does not operate 24 hours. For more information you can also visit <https://www.crownsydney.com.au/general/getting-here>.

## Accommodation

Favourable room rates have been negotiated and secured at Crown Sydney. Accommodation bookings can be made by following the link on the event web page or via this [link](#). *This offer is not combinable with other offers.*

Please refer to the hotel refund policies when booking 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](mailto:nationalevents@taxinstitute.com.au)

## Networking function

A networking function will be held directly following the last session on Thursday from 5.00pm at CirQ, the rooftop bar at Crown Sydney. The networking function is

included in. 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: <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](mailto:nationalevents@taxinstitute.com.au).

For registration enquiries, please contact [customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au).

# Registration

## Registration inclusions

	Online access to presentations and technical papers	Morning/ afternoon tea/ conference lunches	Conference networking reception*
<b>Full registration</b> This registration option entitles one delegate to attend the entire event.	✓✓✓	✓✓✓	✓✓✓

\*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 Friday, 27 February 2026 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](mailto: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
<b>Early bird registration</b> Register on or before 27 February 2026	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$2,315	<input type="checkbox"/> \$2,195
<b>Standard registration</b> Register after 27 February 2026	<input type="checkbox"/> \$2,095	<input type="checkbox"/> \$2,515	<input type="checkbox"/> \$2,395

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

#### Networking function

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

#### Thursday, 26 March 2026 at CirQ, Crown Sydney

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

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

Dietary requirements:

#### \*Become a member and save!

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

- save over \$215 on Affiliate membership on 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](http://taxinstitute.com.au/membership)

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

Signature:

Date of signature:

JOIN TODAY

### 2 Delegate contact details

Member no.:

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

Title:  Mr  Mrs  Miss  Ms      Date of birth:

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 conference:

#### Thursday, 26 March 2026

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

#### Friday, 27 March 2026

- 9:30-10.30am  Session 8A  Session 8B
- 12:00-1.00pm  Session 10A  Session 10B

## 4 Payment summary

Registration fees \$

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

**Total payable** \$

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

## 5 Payment method

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

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

Name on card:

Card no.:  Expiry date:

Cardholder's signature:

For our refund, cancellation and replacement policy visit [taxinstitute.com.au/professional-development/event-policy](http://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](mailto:nationalevents@taxinstitute.com.au)

For registration enquiries, please contact [customeradmin@taxinstitute.com.au](mailto: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](http://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](mailto:customeradmin@taxinstitute.com.au)

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online [taxinstitute.com.au](http://taxinstitute.com.au)

Join the conversation

-  [linkedin.com/school/the-tax-institute](https://www.linkedin.com/school/the-tax-institute)
-  [facebook.com/thetaxinstitute](https://www.facebook.com/thetaxinstitute)
-  [twitter.com/taxinstituteoz](https://twitter.com/taxinstituteoz)
-  [instagram.com/thetaxinstitute\\_](https://www.instagram.com/thetaxinstitute_)

