The Tax Institute

# Noosa Tax Convention

18-20 Nov 2026 | CPD 13

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

Elizabeth Allen, FTI, Macpherson Kelley (Co-Chair, Noosa Tax Convention Organising Committee)
Michael Garrone, CTA, Mage (Co-Chair, Noosa Tax Convention Organising Committee)
Anthony Bach, CTA, Australian Taxation Office
Tracey Dunn, Birchstone Tax Law
Leo Efthivoulou, CTA, ENA Law
John Elliott, CTA, Strategic Edge
Kaitilin Lowdon, ATI, Sladen Legal
Sally Preston, CTA, Smart Solutions Tax Advisory
Rachel Vijayaraj, CTA, Brown Wright Stein Lawyers
Thomas Walrut, FTI, Cooper Grace Ward Lawyers

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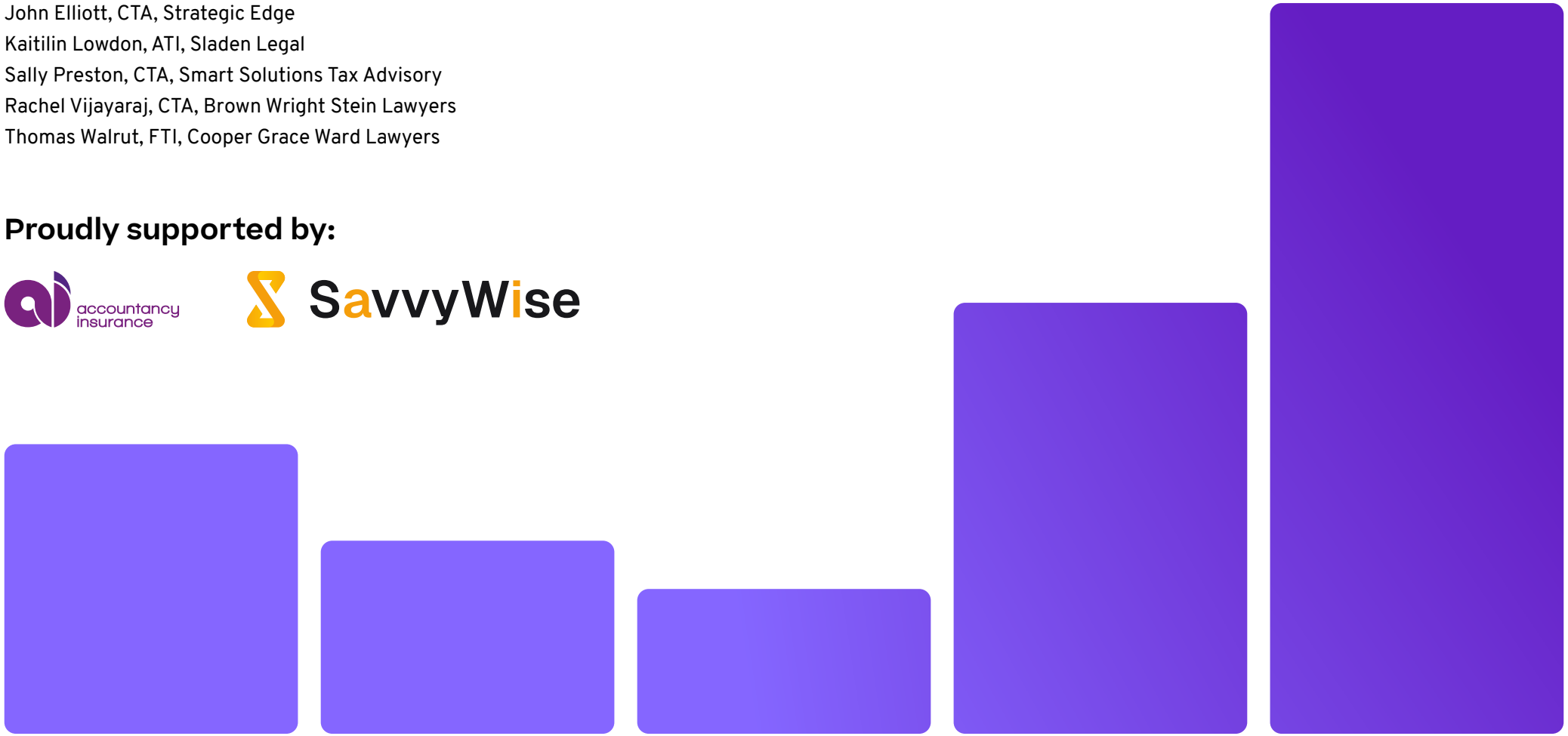


# Welcome

Greetings and a very warm welcome to the 2026 Noosa Tax Convention.

This year's theme, 'What's Old is New Again,' takes us back to one of the enduring pillars of Australia's tax system — Capital Gains Tax — while considering how longstanding rules, structures and concepts are taking on renewed significance in the face of major reform. With significant CGT and trust changes on the horizon, this year's program provides an intensive exploration of the technical issues practitioners need to understand today, while preparing clients for what lies ahead.

We open with a panel session aptly titled 'The Future of Client Structuring – Preparing for 1 July 2027 and Beyond' which will explore strategic structuring options, timing considerations and practical steps as clients prepare for the new regime. We then look beyond the headlines, as we unpack lesser-known CGT events and the risks they can create in trusts and restructures.

The program continues with 'Trusts and Succession in a Time of Flux' and 'The Last of the "Discounts" – The Technicalities of the Small Business CGT Concessions,' providing practical insights into recent developments and the technical issues and traps practitioners continue to encounter. We also explore further issues in asset management and protection and hear directly from Deputy Commissioner Louise Clarke in the annual 'ATO Hot Topics' session, examining the impact of this year's Budget measures and the ATO's current areas of focus in the private groups market.

This year's program features two dedicated deep-dive workshops, providing the opportunity to explore key technical issues in greater detail through guided discussion with peers and our esteemed presenters, providing attendees with real-world practical application. We then turn to the broader implication of Rollovers and go back more than 40 years to examine the taxation of pre-CGT assets, before closing with a timely session on the age old debate of revenue vs capital.

Beyond the technical program, the Convention provides plenty of opportunities to connect, share experiences and build valuable relationships. Join us on Wednesday evening for the event's Welcome Reception, a relaxed opportunity to catch up with old friends and meet new ones. The Convention Dinner also returns to Locale for an evening of good food, good wine and good company.

We look forward to welcoming you for three days of technical depth, practical insights, lively discussion and valuable connections — and to exploring why, in 2026 and beyond, what's old really is new again.

**Elizabeth Allen, FTI**
Co-Chair, Convention Organising Committee

**Michael Garrone, CTA**
Co-Chair, Convention Organising Committee

## Early bird pricing offer
## Register on or before Friday, 23 October 2026 to save!

# Technical program

## Day 1 Wednesday, 18 November 2026

| Time | Session |
|---|---|
| 3:00 – 3:30pm | **Registration** |
| 3:30 – 5:00pm | **Opening Panel: The Future of Client Structuring – Preparing for 1 July 2027 and Beyond**<br>Panellists: Fiona Dillon, CTA, Australian Taxation Office, John Ioannou, CTA, Macpherson Kelley, Marg Marshall, CTA (Life), WLF Accounting & Advisory<br>Facilitator: Julie Abdalla, FTI, The Tax Institute<br>With the most significant CGT and trust reforms in a generation commencing from 1 July 2027 (and trust measures from 1 July 2028), practitioners face an intense period of client advisory work. This panel will explore strategic structuring options, timing considerations and practical steps to prepare clients for the new regime. |
| 5:00 – 7:00pm | **Welcome Reception** |

### Welcome Reception

Join your colleagues, peers and our esteemed presenters for an evening of drinks and networking. The Welcome Reception will be held at the Elysium Noosa Resort from 5:00pm on Wednesday, 18 November, directly after the opening panel. We hope you will join us for an enjoyable evening.

**Date:** Wednesday, 18 November 2026

**Time:** 5:00–7:00pm

**Venue:** Elysium Noosa Resort

**Price:** Inclusive for all full registration delegates
$85 for additional tickets – see registration form for details

**Dress:** Business casual

# Technical program

## Day 2 Thursday, 19 November 2026

| Time | Session |
|---|---|
| 7:30 – 8:00am | **Registration** |
| 8:00 – 8:15am | **Welcome and President's Address** |
| 8:15 – 9:15am | **Session 1: Beyond the Headlines – Hidden CGT Events in Trusts, Transactions and Restructures**<br>**Speaker: Todd Want, CTA, William Buck**<br>CGT analysis often begins and ends with the disposal of an asset. However, steps taken in implementing a restructure, resolving an entitlement or transitioning family wealth can create, alter or extinguish a much wider range of rights and interests, sometimes with unexpected tax consequences.<br>Looking beyond the familiar CGT event A1, this session will use practical scenarios to explore:<br>• How lesser-known CGT events, including events within the C, D and E categories, can emerge when rights, obligations and equitable interests are created, assigned, varied, released or brought to an end<br>• The hidden CGT issues that can arise in dealings with unpaid present entitlements, declarations of trust, changes in how assets are held and private-group or family restructures; and<br>• A practical framework for identifying the relevant CGT asset and event, and managing the resulting timing, valuation, documentation and rollover issues |
| 9:15 – 10:15am | **Session 2: Trusts and Succession in a Time of Flux**<br>**Speaker: Neil Brydges, CTA, Sladen Legal**<br>With both the ATO and the Government signalling an increasingly firm stance on the role of trusts in the tax system, practitioners face a period of considerable uncertainty. This session examines trusts and tax at a critical juncture, as significant wealth continues to flow through these structures, and as potential legislative reform looms on the horizon.<br>Drawing on recent case law and ATO developments, and with the prospect of new trust taxation measures emerging and restructure opportunities looming, this session will assess where we stand at the end of 2026 and what practitioners need to be doing (and watching) over the months ahead. |
| 10:15 – 10:30am | ***This session is proudly sponsored by Accountancy Insurance***<br>**The Ever-changing PI Market – Where we Have Been, Where we are, and Where we are Going**<br>**Speaker: Karen McDonald, Accountancy Insurance**<br>This session provides a practical overview of the professional indemnity (PI) insurance cycle and where the PI market currently sits. It explains the difference between soft and hard market conditions, including how premium competitiveness, market capacity and policy terms can shift over time.<br>The session will highlight what the current market means for accounting professionals, including the opportunities available when insurers are more competitive and policy wordings may be more flexible. It will also provide guidance on how firms can make the most of the current conditions while avoiding common mistakes when arranging or renewing their PI cover. |

# Technical program

## Day 2 Thursday, 19 November 2026 continued

| Time | Session |
|---|---|
| 10:30–11:00am | **Morning tea** |
| 11:00am–12:00pm | **Session 3: The Last of the "Discounts" – The Technicalities of the Small Business CGT Concessions**<br>**Speakers: Dung Lam, CTA, West Garbutt, Alex Whitney, CTA, West Garbutt**<br>The Budget has raised the stakes for the availability of the CGT small business concession and made them more important than ever. This session provides a deep dive into the more technical aspects of the CGT small business concessions and where the problems continue to arise, including:<br>• Specific requirements for the 15-year exemption, when the holding periods are reset, what in connection with your retirement actually requires and how proceeds are flowed to CGT concession stakeholders from companies and trusts<br>• Revisiting *Devuba v FCT* and how class shares affect your small business participation percentages and can ruin your access to the small business concessions<br>• The full web of connected entities, affiliate and entities connected with affiliates – how to map them, how to test them and why the February 2018 changes still create problems today<br>• The $6 million maximum net asset value test, what counts (and what doesn't), personal use assets, inter-entity assets and liabilities, and the commonly overlooked assets that blow the threshold on a review or audit<br>• What audit-ready valuation looks like after *Kilgour v FCT* and revisiting ATO market valuation guidelines<br>• When planning to meet bright-line tests crosses the line. |
| 12:00–1:00pm | **Session 4: Back-to-Back Rollover Relief – Latest ATO Developments and Practical Implications**<br>**Speaker: Linda Tapiolas, CTA, Cooper Grace Ward Lawyers**<br>Due to the proposed changes to the taxation of trusts, many clients may be looking to restructure out of trusts to companies. One option for clients is the use of the general CGT rollovers in provisions subdivision 122-A to 124-N particularly where they cannot access the small business CGT concessions. This session will explore the scope and limitations of the key rollover provisions including the uncertainty as to the Commissioner's position on b2b rollovers, particularly as the long awaited guidance has been put on hold using practical insights through a range of real-life restructuring examples<br>Key discussion points of this session include:<br>• Overview of the risk issues when applying the rollovers<br>• Issues in relation to b2b rollover relief (particularly, where a 124-M scrip for scrip rollover follows a 122-A or 124-N rollover) and what may draw scrutiny from the ATO<br>• The significance of the AusNet decision and whether it provides taxpayers with support for b2b rollover outcomes<br>• Comparison between general CGT rollovers, small business CGT concessions, small business restructure and the proposed transitional rollover relief for the restructure of minimum tax trusts |
| 1:00–2:00pm | **Lunch** |

# Technical program

## Day 2 Thursday, 19 November 2026 continued

| Time | Session | |
|---|---|---|
| 2:00 – 3:30pm | **Workshop 1**<br>Workshop Coordinator: Tom Walrut, FTI, Cooper Grace Ward Lawyers<br>Workshop Leaders: Jacquii Burnham, CTA, KPMG, Jack Colley, ATI, West Garbutt, Tracey Dunn, Birchstone Legal, Nick Farr, RSM Australia<br>This workshop will cover key themes and case studies from plenary sessions throughout the program. | **Workshop 2**<br>Workshop Coordinator: Elizabeth Allen, FTI, Macpherson Kelley<br>Workshop Leaders: DJ Alexander, CTA, QLD Bar, Natalie Cameron, CTA, Elda Legal, John Elliott, CTA, Strategic Edge, Adrian Zuccarini, FTI, Australian Taxation Office<br>This workshop will cover key themes and case studies from plenary sessions throughout the program. |
| | Each workshop will be run by experienced practitioners who will facilitate guided group discussion in a collaborative workshop environment. Prior to attending the event, delegates will be given all relevant materials, workshop facts and questions, and are required to familiarise themselves with these prior to the session. | |
| 3:30 – 4:00pm | **Afternoon tea** | |
| 4:00 – 5:00pm | **Session 5: ATO Hot Topics**<br>Speaker: Louise Clarke, Australian Taxation Office<br>This year, Deputy Commissioner Louise Clarke will be outlining the impact that this year's announced Budget measures will have on the ATO's more recent areas of focus in the private groups market. As always, this will be an interactive session with Louise taking questions from the audience throughout the presentation. | |

## Convention Dinner

Join your colleagues and event speakers for a three-course meal, drinks and networking in one of Noosa's best kept secret spots. Surrounded by lush gardens, Locale Noosa sits in a protected corner of Hastings Street just a few steps from the golden sands of Noosa Main Beach. Drawing heavily on Italian tradition, Locale Noosa offers a seasonally changing menu using the best in local produce and premium imported ingredients.

**Date:** Thursday, 19 November 2026

**Time:** 7:00pm onwards

**Venue:** Locale, 62 Hasting Street, Noosa Heads

**Price:** Inclusive for all full registration delegates
$170 for additional tickets – see registration form for details

**Dress:** Business casual

# Technical program

## Day 3 Friday, 20 November 2026

| Time | Session |
|---|---|
| 8:30 – 9:30am | **Session 6: Trusts, Asset Protection and Restructuring – Navigating the Current Landscape**<br>**Speaker: Matthew Hudson, SV Partners**<br>Trust structures continue to play a critical role beyond tax outcomes, particularly in providing asset protection and preserving family wealth. This session will examine how advisers and business owners can continue to use trusts effectively in an environment of increasing scrutiny.<br>Key discussion points include:<br>• Trusts as an asset protection tool, and why their value extends well beyond tax planning<br>• Common asset protection strategies, including the use of special class shares, investment companies and trust distributions, and the benefits and risks associated with different approaches<br>• Practical restructuring scenarios, including transitioning from discretionary trusts to fixed trusts, and the key tax and commercial considerations<br>• How insolvency practitioners and other parties may seek to challenge trust and restructuring arrangements, and the steps that can be taken to strengthen and protect those structures<br>• Recent developments affecting trust structures and what they mean for maintaining effective asset protection outcomes<br>• Real-world examples of trust and asset protection arrangements, including what works, common pitfalls and areas attracting increased scrutiny.<br>Attendees will gain practical insights into designing and maintaining trust structures that balance commercial objectives, tax outcomes and asset protection considerations. |

# Technical program

## Day 3 Friday, 20 November 2026 continued

| Time | Session |
|---|---|
| 9:30–10:30am | **Session 7: The Great Divide … Revenue vs Capital – Mere Realisation or Enterprise?**<br>**Speaker: Daniel McInerney KC, CTA, Victorian Bar**<br>Is the distinction between capital and revenue still important? Given the size and scope involved in *Morton*'s case, where is the dividing line between revenue and capital? What could have pushed it over the edge beyond mere realisation? Is how you finance a real risk? What other risk factors should a taxpayer consider? The ATO's Decision Impact Statement on *Morton* states a continuity of the status quo. But with the main residence exemption now one of the last CGT assets with an inbuilt tax exemption, this dividing line is more important than ever. |
| 10:30–11:00am | **Morning tea** |
| 11:00am–12:30pm | **Workshop 1**<br>**Workshop Coordinator: Tom Walrut, FTI, Cooper Grace Ward Lawyers**<br>**Workshop Leaders: Jacquii Burnham, CTA, KPMG, Jack Colley, ATI, West Garbutt, Tracey Dunn, Birchstone Legal, Nick Farr, RSM Australia**<br>This workshop will cover key themes and case studies from plenary sessions throughout the program.<br>**Workshop 2**<br>**Workshop Coordinator: Elizabeth Allen, FTI, Macpherson Kelley**<br>**Workshop Leaders: DJ Alexander, CTA, QLD Bar, Natalie Cameron, CTA, Elda Legal, John Elliott, CTA, Strategic Edge, Adrian Zuccarini, FTI, Australian Taxation Office**<br>This workshop will cover key themes and case studies from plenary sessions throughout the program.<br>Each workshop will be run by experienced practitioners who will facilitate guided group discussion in a collaborative workshop environment. Prior to attending the event, delegates will be given all relevant materials, workshop facts and questions, and are required to familiarise themselves with these prior to the session. |
| 12:30–1:30pm | **Lunch** |
| 1:30–2:30pm | **Session 8: Over 40 Years in the Making – The Taxation of Pre-CGT Assets**<br>**Speaker: Andy Milidoni, CTA, Mills Oakley**<br>Despite CGT now being in excess of 40 years old, there are still plenty of pre-CGT assets around. The tax issues associated with pre-CGT assets are complex and preserving value for clients ahead of the upcoming CGT changes is more important than ever. This session will focus on:<br>• Detailed review of the Budget changes with respect to pre-CGT assets<br>• Division 149 ownership issues – From IT 2340 to *XLZH v FCT* to where?<br>• How to evidence majority underlying interests and where the inconsistencies are<br>• What changes may trigger Division 149<br>• Revisiting CGT event K6 and what clients need to consider ahead of the upcoming changes to CGT<br>• ATO approach to reviews<br>• Traps when it comes to calculating K6 amounts. |
| 2:30–3:00pm | **Closing address followed by afternoon tea 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.

**DJ Alexander, CTA,** has a broad practice, with a strong focus on taxation. His key practice areas also include trusts, estates, property, insolvency, bankruptcy and commercial disputes. DJ is recognised in Doyle's Guide as a leading Queensland tax barrister. He regularly appears in both federal and state tax matters and provides specialist tax advice to solicitors and accountants. DJ appeared in the following recently published tax cases: *Ziegler v Commissioner of Taxation* [2025] FCAFC 168; (2025) 313 FCR 574; 2025 ATC 20-983 (Special Leave to Appeal denied: [2026] HCADisp 89); *Collie and Commissioner of Taxation* [2026] ARTA 328 and *Hasan v Commissioner of Taxation* [2026] FCA 1072.

**Elizabeth Allen, FTI,** is a Special Counsel at Macpherson Kelley. She acts for a wide range of private, corporate and HNWI clients with a primary focus on tax structuring and tax dispute work, concentrating on the delivery of outcomes and solutions that give her clients the confidence to keep doing what they do best. Elizabeth also acts for clients on various commercial matters including business sales and acquisitions.

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

**Jacquii Burnham, CTA,** is an Associate Director at KMPG in the Enterprise Division. With over 19 years' experience in Public Practice, Jacquii plays a key role as business and personal tax expert to many high net worth individuals and privately owned businesses. Jacquii has a passion for finding solutions to complex tax issues and enjoys working with clients to navigate the best tax outcome for their personal situation.

**Natalie Cameron, CTA,** is an accomplished lawyer with ten years' experience advising business owners, high-net-worth individuals and family groups on taxation, succession planning and commercial transactions. Her practice focuses on tax structuring, business succession, intergenerational wealth transfers, strategic planning for private groups and the taxation of family-owned businesses. Natalie is known for her practical, commercially focused approach and her ability to translate complex tax and legal issues into clear, actionable advice for clients and their advisers. As the founder of Elda Legal, Natalie works closely with accountants, financial advisers and business owners to develop integrated legal solutions that protect family wealth, achieve manageable taxation outcomes and facilitate the smooth operation of clients' businesses.

**Louise Clarke** commenced her role as Deputy Commissioner, Private Wealth, on 23 August 2021 and her experience makes her well placed to lead the business line. Prior to Private Wealth, Louise was the ATO's Deputy Commissioner for Policy, Analysis and Legislation for just over three years. During that time, Louise led the ATO's contribution to the legislative design of the COVID-19 measures, including JobKeeper, and contributed to their implementation. Louise has spent an

# Presenters

extensive period of her ATO career working in the Tax Counsel Network: she spent five years leading ATO strategic litigation and ran significant cases in the Federal Court and the High Court including *Chevron*, *RCF IV* and *RCI*. Louise's law design experience has spanned across her time in the ATO, including two years seconded to Treasury as a member of the Ralph Review Secretariat, working closely with Treasury in developing redrafted transfer pricing law, leading the ATO's contribution to a number of Board of Taxation reviews and working of the design and implementation of a raft of new measures, including Division 7A, the alienation of personal services income rules and the debt/equity rules.

**Jack Colley, ATI,** is a Senior Associate at West Garbutt based in Brisbane. Jack is a lawyer and Chartered Accountant and advises on a wide range of tax and revenue issues, including income tax, capital gains tax, foreign tax issues (including residency), taxation of trusts, GST, FBT, payroll tax and other state taxes. Jack has acted for clients in a range of matters, including before both federal and state courts and tribunals, during ATO audits, objecting to ATO decisions, seeking private rulings from the ATO and providing technical advice. Jack has acted for a range of clients, including accountants and financial advisers, SMEs, family business, corporate groups and individuals, across various industries including agribusiness, retail, medical and allied health.

**Fiona Dillon, CTA,** is the Chief Tax Counsel at the Australian Taxation Office (ATO). She is accountable for forming the ATO view of the tax and super laws, resolving the ATO's most significant tax technical issues, accountable for the technical positions put before Australian Courts and for the ATO's public advice and guidance. 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, a Chartered Tax Advisor and holds a Bachelor of Commerce, Bachelor of Laws with Honours, and a Master of Taxation.

**Tracey Dunn** is Associate Director at Birchstone Legal Group. 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.

**John Elliott, CTA,** has been in public practice for over 20 years. He has extensive experience working with small to medium businesses across a diverse range of industries. He advises clients on a broad range of matters such as structuring, business and personal income tax. He has been a Chartered Accountant since 2008, and a tax agent since 2010.

**Nick Farr** is a Director in RSM's Business Advisory division, with over a decade of experience supporting small to medium-sized enterprises and high-net-worth family groups. He specialises in providing tailored tax advisory, private wealth structuring, and financial reporting services to privately owned businesses, particularly those experiencing growth, expansion, or generational transition. Nick has extensive experience advising clients in the real estate and construction industry, including property developers, investors, builders, contractors, and family-owned property groups. He assists clients with a broad range of taxation and commercial matters, helping them navigate complex regulatory requirements while achieving their strategic objectives.

**Matthew Hudson** is a Director at SV Partners and he is a lawyer of the Supreme Court of Queensland (admitted March 2015) and accountant operating a National practice. Matthew is a founding member and current leader of SV Voidables and the voidable recovery team (VR Team). Matthew also leads the forensic accounting team in the Brisbane office. Matthew provides a tailored, flexible and value-based approach to each matter and can even act on speculative terms in appropriate circumstances. Matthew is an expert in corporate insolvency, with a track record of managing large and complex voluntary administrations (including trade-ons), liquidations and business restructure engagements. He has assisted numerous businesses through the restructuring process, providing tailored solutions to help optimise operations, manage outstanding liabilities and position the business for future success.

# Presenters

**John Ioannou, CTA,** was admitted as a Solicitor in 2002, is a Principal Lawyer at Macpherson Kelley and leads the national tax practice. He has experience in the areas of tax structuring, tax disputes and commercial transactions. John has a Bachelor of Arts, Bachelor of Laws and a Masters of Law. He is currently serving as the Queensland representative on The Tax Institute's National Council.

**Dung Lam, CTA,** is a Principal at West Garbutt and is based in Sydney. Dung has more than two decades of experience in advising on a wide variety of taxes, including income tax, capital gains tax, GST and state taxes such as duty, payroll tax and land tax. Dung also has extensive experience advising on taxation trusts, superannuation issues in the self-managed superannuation funds arena and tax issues related to estate planning. Dung is a Chartered Tax Adviser, full member of the Society of Trusts and Estate Practitioners, an accredited Specialist in Business and Personal Tax with the NSW Law Society, a member of the Business Law Section Taxation Committee of the Law Council of Australia and a member of the NSW Law Society Liaison Committee with Revenue NSW. Dung advises a broad range of clients ranging from corporates, small-to-medium enterprises, high-net-worth individuals, professional firms, accountants, and financial planners and their clients.

**Marg Marshall, CTA (Life),** is a Partner at WLF Accounting & Advisory in Hobart. She has over 25 years' experience in tax advisory at a technical level. Marg advises clients of all types, from individuals to large listed entities, specialising in transaction and structuring advice, capital gains tax, not-for-profit tax concessions and deceased estates. Marg is a Past President of The Tax Institute and a former member of the Tasmanian State Council, having served on the Council from 2013-2022. She is also a member and former Tasmanian Regional Councillor of Chartered Accountants Australia and New Zealand. She regularly participates in tax law consultations and often presents for The Tax Institute.

**Karen McDonald** of Accountancy Insurance commenced her insurance career in 1985. Since this time, she has worked in both underwriting and insurance broking for local and international companies in Australia and New Zealand. Karen has been specialising in professional indemnity insurance for over 25 years, and in more recent years focusing on cyber insurance and how the cover benefits accounting professionals. As the Associate Director of Professional Risks, Karen achieves favourable outcomes for her clients by thoroughly understanding the profession and seeking cover beyond client expectations.

**Daniel McInerney KC, CTA,** is one of Australia's leading taxation barristers. Since being called to the Bar in 2007, he has appeared in many significant tax cases and is regularly called upon for his advice on complex tax issues by taxpayers and the Australian Taxation Office.

**Linda Tapiolas, CTA,** is a Partner in the Cooper Grace Ward Lawyers Commercial team. She provides a range of support services to accountants, financial planners and other professional advisers. This includes technical advice on complex tax, CGT and Division 7A issues, as well as acting on business sales and acquisitions to ensure clients achieve commercial and tax-effective outcomes. Prior to joining Cooper Grace Ward, Linda worked as an accountant for 18 years advising clients on capital gains, business acquisitions and restructuring. She also conducted seminars and training sessions on various topics including CGT small business concessions.

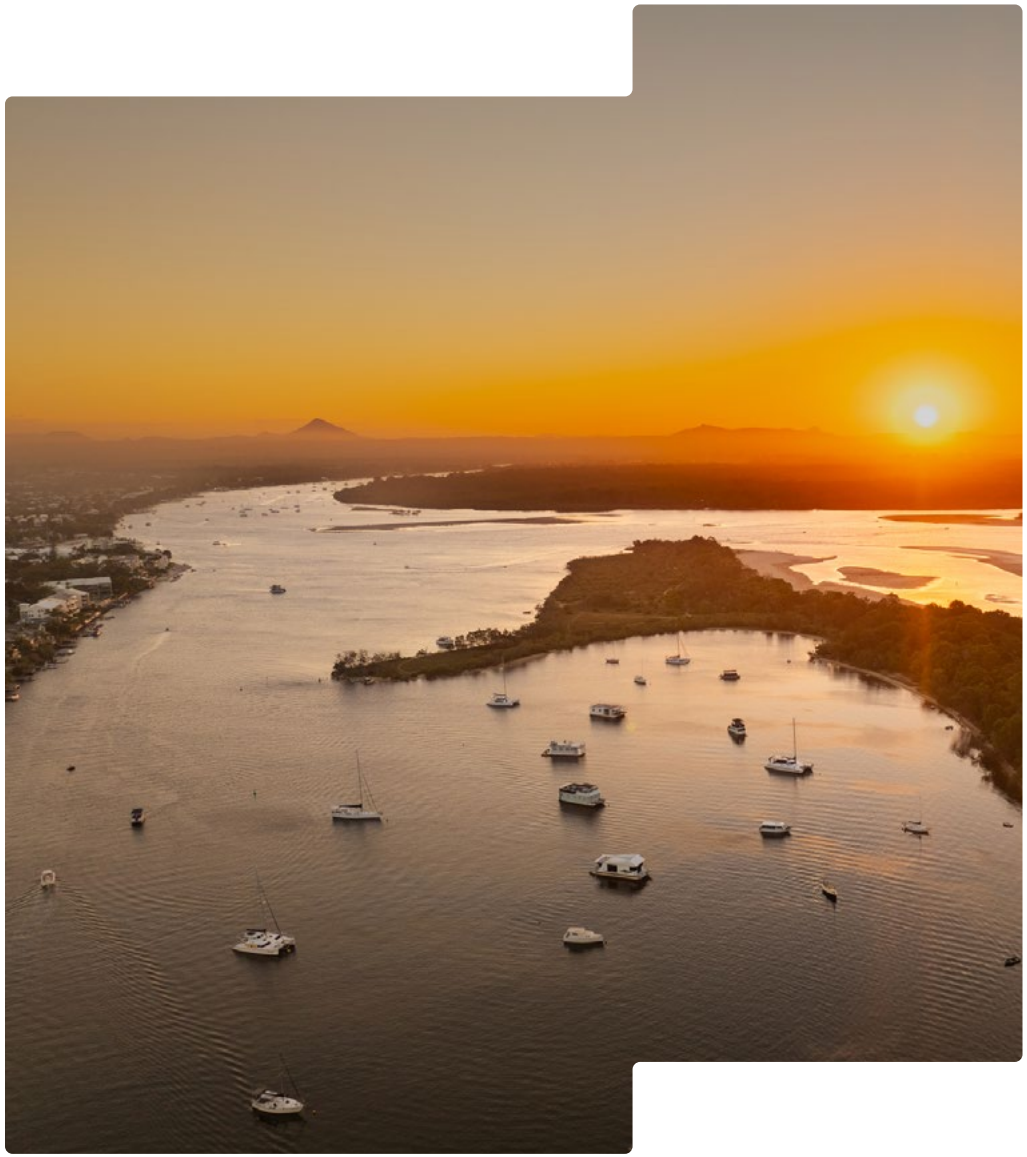
**Tom Walrut, FTI,** is a Special Counsel at Cooper Grace Ward Lawyers experienced in providing tax advice to clients on both state and federal tax issues. Tom primarily works with SME clients in a broad range of industries advising on tax planning, transactional matters, structuring and general commercial matters. He also regularly acts for clients in taxation objections and disputes with both state and federal revenue authorities.

**Todd Want, CTA,** is the Partner in charge of the Tax Services division at William Buck in Sydney, where he specialises in private client tax matters. Todd advises his clients on a broad range of tax issues, while he also provides specialist consulting services to accountants, lawyers, financial planners and other professionals in public practice to assist them in advising their clients. Todd is also the immediate past President of The Tax Institute and a regular presenter at various Tax Institute conferences and events.

# Presenters

**Alex Whitney, CTA,** is a qualified lawyer and Chartered Tax Adviser and advises in respect of income tax, GST, stamp duty and other state taxes. Alex acts for a broad range of clients, including family businesses, high wealth private groups, national non-profit organisations, deceased estates and corporate groups. He has acted on large transactions which required significant tax involvement, provided tax advice on complex structures and transactions, and has represented clients in complex audits, objections, Administrative Tribunal matters and appeals to the Federal Court. The Doyle's Guide 2022 included Alex on its list of Tax Law Rising Stars – Australia, a national list of non-partner tax lawyers who have been identified for their work and expertise in tax.

**Adrian Zuccarini, FTI,** is an Assistant Commissioner in Private Wealth with 19 years experience at the ATO. He has responsiblity for leading compliance and engagement teams Victoria and NSW and the Advisor Program. Prior to joining Private Wealth he was in Tax Counsel Network where he provided technical support and guidance on a range of complex issues, with expertise in taxation issues relating to Property and Construction, Professional Firms, trusts, capital gains tax, Division 7A and Part IVA. Adrian has a Business Degree with First Class Honours in Taxation as well as a Master of Law (Juris Doctorate) from Monash University.



# Venue and accommodation

## Elysium Noosa Resort

Hotel entrance via 14–16 Hastings Street, Noosa Parade, Noosa Heads QLD 4567

Elysium Noosa Resort is a sanctuary for those who seek more than an escape. A refined resort set in the heart of one of Australia's most iconic coastal destinations, Elysium Noosa reimagines luxury not as excess, but as the artful orchestration of space, time and care. Discover a haven of coastal elegance on Noosa's Hastings Street, where effortless luxury unfolds with understated grace, just steps from Noosa's iconic Main Beach.

### Getting there

Elysium Noosa Resort is located on Hastings Street, in the heart of Noosa, approximately 34km from Sunshine Coast Airport and 140km from Brisbane Airport.

### Parking

Car parking is $25 per day for self-parking or $35 per day for valet parking at the Elysium Noosa Resort. Parking is subject to availability and is not guaranteed.

### Accommodation

Favourable room rates have been negotiated and secured at the Elysium Noosa Resort. Accommodation bookings can be made through our accommodation and travel provider, Accommodation Link, by following the link below.

https://book.accommodationlink.com.au/NoosaTax2026

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

# Destination Noosa

## Dining out on Hastings Street

### Bistro C | 49 Hastings Street

Positioned perfectly on the beachfront overlooking Noosa's Laguna Bay and inspired by the amazing local produce of the region, Bistro C's menu showcases the changing seasons in carefully created dishes by their dedicated culinary team. Visit the website to find out more or phone 07 5447 2855 to book a table.

### Bang Bang | 6/32 Hastings Street

Located in the middle of bustling Hastings Street, Bang Bang is one of the best Asian restaurants in Noosa and offers a diverse and extensive wine list as well as a variety of share plates. Visit the website to find out more or phone 07 3185 4666 to book a table.

### El Capitano | Upstairs, 52 Hastings Street

Old-world pizzas and cocktails for new-age sailors. El Capitano is renowned for their take on old-world pizzas, made using certified organic fresh milled flours, filtered water, sea salt and a 72-hour fermentation process. Pair this with their vast cocktail list and you've got the perfect evening. Visit the website to find out more or phone 07 5474 9990 to book a table.

## Explore Noosa

### Stand up paddle-boarding

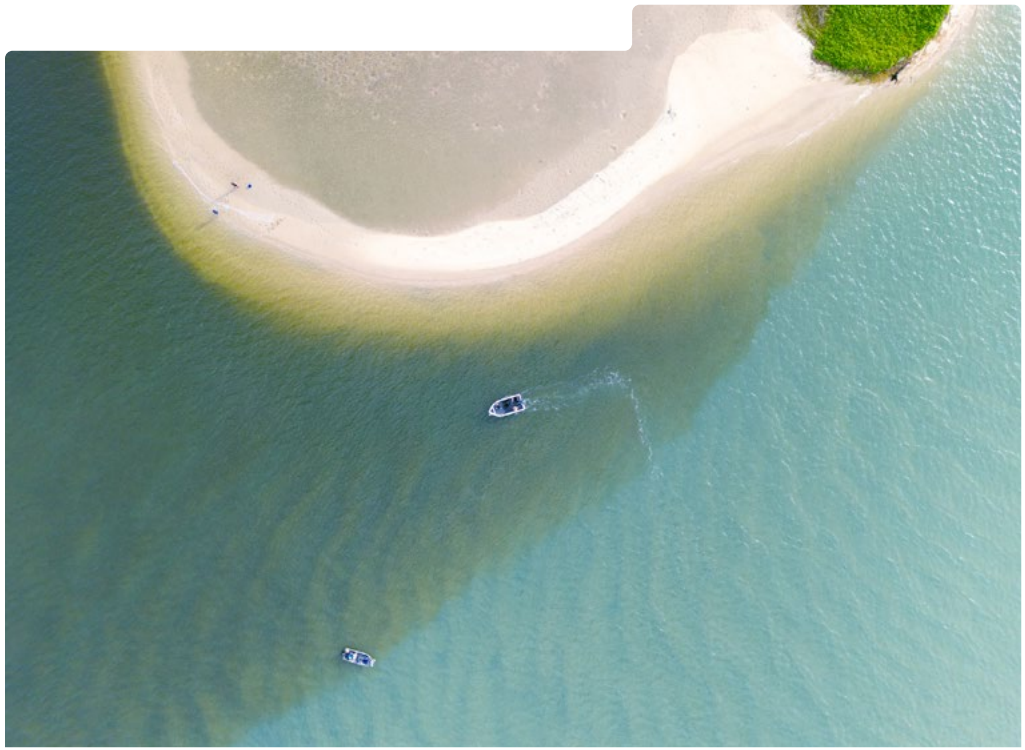
Try your hand at stand-up paddle-boarding and see Noosa from a new perspective. Get the team together and book a group lesson or join one of the experienced tour guides for a journey through the waterways and mangroves. Find out more at Noosa Stand Up Paddle Boarding.

### Gondolas of Noosa

If you would rather relax and let someone else do the driving, why not book a gondola ride? With BYO drink or catered options, you can take your team or enjoy a quiet ride around beautiful Noosa by yourself. Bookings are essential and can be done via their website or by phoning 0412 929 369.

## Shopping

Hastings Street is a haven for shoppers with an eclectic collection of boutique and brand-name shops covering all things from fashion, fine art, homewares, jewellery and more.



# Event information

### Welcome Reception – Wednesday, 18 November 2026

The Welcome Reception will be hosted at the Elysium Noosa Resort on Wednesday, 18 November from 5:00pm. The Welcome Reception is included in the event registration fee for delegates. Additional tickets can be purchased for accompanying persons and guests at a cost of $85.

### Convention Dinner – Thursday, 19 November 2026

The Convention Dinner will be hosted at Locale on Thursday, 19 November from 7:00pm. The dinner is included in the event registration fee or delegates. Additional tickets can be purchased for accompanying persons and guests at a cost of $170.

### 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 convention counts for 13 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 convention.

### Special dietary and accessibility requirements

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

### Cancellation policy

The Tax Institute reserves the right to alter, amend or cancel all or any of the arrangements contained in the program. Should a face-to-face event be cancelled due to an event beyond The Tax Institute's reasonable control, including "an act of god", "pandemic", "health-related event" or "government requirements", we will endeavour to transition to an online format to deliver the event. If there is a difference in price, a credit will be provided to delegates to be used at a future event.

It is a condition of acceptance of registration that an administration fee of 20% of the registration fee be charged for cancellation if you can no longer attend the event. Cancellations must be received in writing by The Tax Institute five working days prior to the event. No refund will be given for cancellations received within five working days of the event. A replacement may be nominated. If the replacement is not a member, the non-member registration fee will apply. CPD hours will be allocated to the designated attendee.

The Tax Institute cannot accept responsibility for delegates' late transport arrivals or non-arrivals due to delays.

### Privacy

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

### Enquiries

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

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

# Registration

## Registration inclusions

| | Online access to presentations and technical papers | Morning/ afternoon tea/ convention lunches | Welcome Reception and Convention Dinner* |
|---|---|---|---|
| **Full registration** 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, 23 October 2026 will be entitled to an early bird discount.

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

### Group discounts

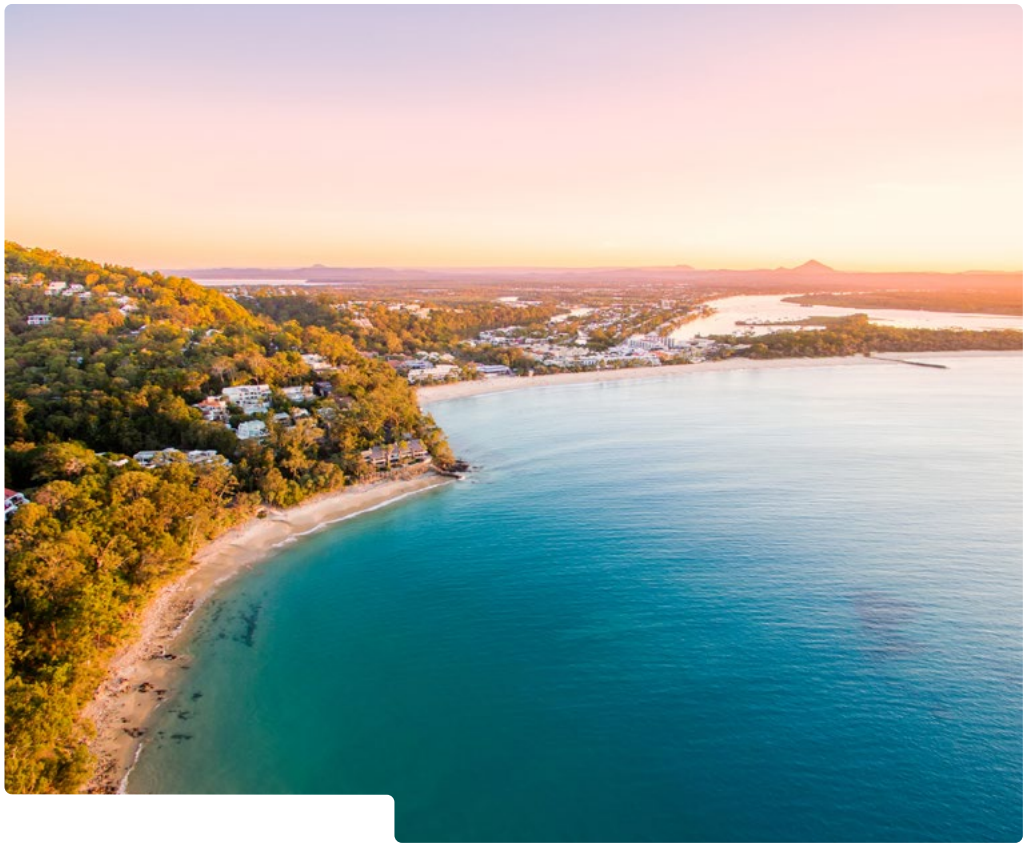
Purchase four full registrations (early bird or standard) and receive a fifth full registration for free. The free fifth registration must be of equal or of less value to the four paid registrations.

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.

**Register now!**

Register online ▶

Register via form ▶
included in this brochure



The Tax Institute

# Noosa Tax Convention
## Registration form

45232 | WD

A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain the 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 – 13 CPD hours**

| | Member | New member* |
|---|---|---|
| **Early bird registration**<br>Register on or before 23 October 2026 | ☐ $2,195 | ☐ $2,615 |
| **Standard registration**<br>Register after 23 October 2026 | ☐ $2,395 | ☐ $2,815 |

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

**Welcome Reception**

The Welcome Reception is INCLUDED in the registration fee for delegates attending the full convention.

**Wednesday, 18 November 2026 at the Elysium Noosa Resort**

☐ Yes, I WILL be attending the Welcome Reception OR

☐ No, I WILL NOT be attending the Welcome Reception

☐ Yes, I require additional tickets for the Welcome Reception at $85 per person

No. _____ x tickets at $85 each: $ _____

Dietary requirements:

**Convention Dinner**

The Convention Dinner is INCLUDED in the registration fee for delegates attending the full convention.

**Thursday, 19 November at the Locale Noosa**

☐ Yes, I WILL be attending the Convention Dinner OR

☐ No, I WILL NOT be attending the Convention Dinner

☐ Yes, I require additional tickets for the Convention Dinner at $170 per person

No. _____ x tickets at $170 each: $ _____

Dietary requirements:

## 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

***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.

JOIN 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: DD/MM/YYYY

## 3 Payment summary

| | |
|---|---|
| Registration fees | $ |
| Additional guest tickets – Welcome Reception ($85 each) | $ |
| Additional guest tickets – Convention Dinner ($170 each) | $ |
| **Total payable** | $ |

## 4 Payment method

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

☐ **Cheque payable to The Tax Institute** (in Australian dollars)

☐ **Credit card** Card type: ☐ AMEX ☐ Visa ☐ Mastercard ☐ Diners

Name on card:

Card no.: Expiry date: MM/YY

Cardholder's signature:

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

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

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

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

**To register** **Email** customeradmin@taxinstitute.com.au **Mail** Level 21, 60 Margaret Street, Sydney NSW 2000 **Online** taxinstitute.com.au

26-037EVT_08/26

The Tax Institute

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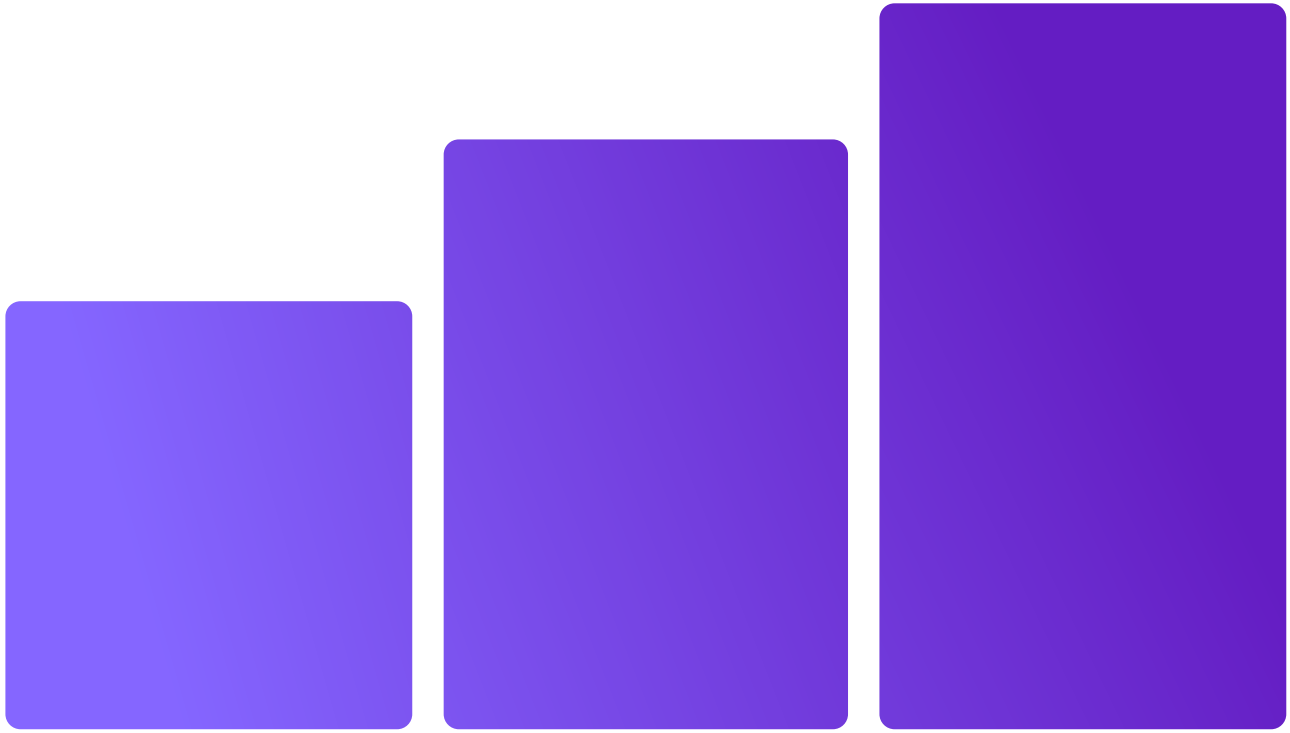
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