

# Infrastructure & Investments Tax Conference

 18-19 Jun 2026

 CPD 12



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

Minh Dao, CTA, Co-Chair, KPMG

Steve Ford, CTA, Co-Chair, PwC Australia

Ed Consett, ATI, Alvarez & Marsal

Emma Crause, The GPT Group

Mark Edmonds, PwC Australia

Graeme Friend, EY

Jillian Gardner, HRL Morrison

Gaurav Gupta, CTA, Australian Taxation Office

Kelly Heezen, Telstra

Luke Imbriano, FTI, Corrs Chambers Westgarth

Richard Lambkin, Deloitte

Daniel Paolini, FTI, White & Case

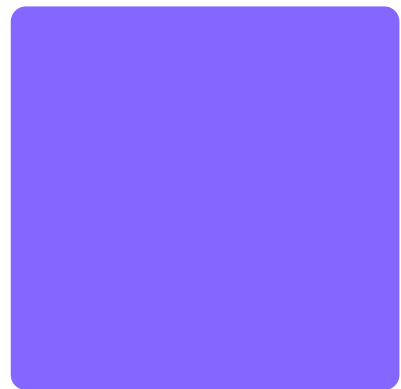
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Matthew Shanahan, CTA, Johnson Winter & Slattery

Shashi Sivayoganathan, FTI, Transurban

Ellen Thomas, ATI, Allens

Adrian Varrasso, ATI, MinterEllison





# Welcome

On behalf of the Organising Committee, we are excited to welcome you to the Infrastructure & Investments Tax Conference.

Now in its 11th year, the Infrastructure & Investments Tax Conference will be held at Crown Sydney on 18 and 19 June 2026. This year marks another significant milestone as we continue to broaden our focus to address key tax issues impacting infrastructure, real property and private capital investment.

As we build on the success of previous years, we are honoured to welcome a highly respected and diverse range of speakers, including experienced members of the tax bar, senior ATO officers and leading advisers and experts. We are pleased to have Michael O'Meara SC delivering a keynote address on contentious thin capitalisation issues, particularly given the impending Board of Taxation implementation review. Aaron Bennett will also deliver the much-anticipated ATO update on key focus areas.

This year's conference offers a diverse program relevant to private capital, including the rise of AI-enabled tax functions, the attractiveness of Singapore as a tax platform, the New Zealand approach to infrastructure tax reform, tax issues arising from private capital holding period reviews, developments in tax dispute settlements, outbound investment structures, and stamp duty issues relevant to the real property asset lifecycle.

Join us as we explore the latest insights on core tax issues, including Division 250 and public sector control, trends in recent anti-avoidance cases, and issues relating to deemed dividends. Gain technical and practical knowledge that you can apply immediately to navigate some of the most critical tax challenges in the industry.

Lastly, expand your network and connect with professionals from across the industry, including public sector representatives, leading consultants and corporate experts, at our must-attend networking function.

We look forward to seeing you in Sydney in June.



**Steve Ford, CTA**  
Co-Chair, Organising Committee



**Minh Dao, CTA**  
Co-Chair, Organising Committee

**Early bird pricing offer**  
**Register on or before Friday 15 May to save!**

# Technical program

**Day 1** Thursday, 18 June 2026

Time *AEST	Session
8:45 – 9:15am	<b>Registration</b>
9:15 – 9:30am	<b>Welcome and President’s Address</b> Speaker: Steve Ford, CTA, Co-Chair, Infrastructure & Investments Tax Conference Organising Committee, Tim Sandow, CTA, President, The Tax Institute
9:30 – 10:30am	<b>Session 1: Keynote Address: Thin Capitalisation</b> Speaker: Michael O’Meara, SC, ATI, Sixth Floor Selborne Wentworth Chambers  The third-party debt test was introduced as an alternative test for infrastructure and real property taxpayers under the new thin capitalisation regime. While intended to provide a simpler and more streamlined approach than the former arm’s length debt test, the rules have raised several complex interpretational challenges.  This keynote will explore key concepts emerging from the regime, including commercial operations, recourse and Australian assets. Speakers will also examine the ATO’s evolving views and discuss the practical implications for infrastructure investors and advisers.
10:30 – 11:00am	<b>Morning tea</b>
11:00am – 12:00pm	<b>Session 2: ATO Address</b> Speakers: Aaron Bennett, Australian Taxation Office, Blake Sly, Australian Taxation Office  The ATO will provide an update on its Private Capital Program of work and highlight current focus areas within the private capital market, including infrastructure and private equity.
12:00 – 1:00pm	<b>Session 3: From Outback to Outbound: Navigating Offshore Investments for Institutional Investors</b> Panellists: Daniel Caltabiano, Alvarez & Marsal, Gina Maio, AusSuper, Jayde Thompson, Alvarez & Marsal Facilitator: Edward Consett, ATI, Alvarez & Marsal  Driven by the growth of Australia’s superannuation sector, our rapidly expanding savings pools have increasingly positioned Australia as a net exporter of capital. As institutional investors look beyond our shores for investment opportunities, there is a growing focus on ensuring that tax consequences are appropriately managed for outbound investment.  This session will provide a refresher on Australian-specific tax and structuring considerations, together with an overview of emerging trends and practical issues affecting offshore investment by Australian institutional investors.

# Technical program

**Day 1** Thursday, 18 June 2026 continued

Time *AEST	Session
1:00 – 2:00pm	Lunch
2:00 – 3:00pm	<p><b>Session 4: Back to the Future? Interests in Land, Old Principles, New Challenges</b> Speakers: Luke Imbriano, FTI, Corrs Chambers Westgarth, Costa Koutsis, CTA, Corrs Chambers Westgarth</p> <p>The meaning of an interest in land is not new in the context of State taxes. Yet, in a case of “back to the future”, these concepts are re-emerging as critical considerations for income tax and foreign investor exits. What can we learn from decades of State court decisions in an indirect tax context, and are those principles even settled?</p> <p>This session will provide an overview of recent income tax and indirect tax law developments relating to the meaning of an interest in land, including revenue authority activity and our views on what may happen next.</p> <p>Speakers will explore:</p> <p>Taxable Australian Real Property for income tax purposes, including</p> <ul style="list-style-type: none"><li>• Insights from the Newmont litigation</li><li>• Implications of the YTL litigation</li><li>• Proposed reforms to Division 855 of the ITAA 1997 and their impact on the infrastructure investment landscape</li></ul> <p>Key considerations for State taxes, including</p> <ul style="list-style-type: none"><li>• Treatment of fixtures as separate from land and its relevance for indirect tax</li><li>• Lessons from the Conexa litigation</li></ul> <p>Additional discussion points include</p> <ul style="list-style-type: none"><li>• Our experience with revenue authorities on matters related to real property and interests in land</li><li>• The outlook, including our views on how the law on these income tax and indirect tax matters may progress</li></ul>
3:00 – 3:30pm	Afternoon tea

# Technical program

**Day 1** Thursday, 18 June 2026 continued

Time *AEST	Session
3:30–4:30pm	<p><b>Session 5: Why Is Singapore an Attractive Platform into Australia for Foreign Investors?</b> Panellist: Liz Lester, Greystar Facilitator: Minh Dao, CTA, KPMG</p> <p>Singapore continues to play an important role as a hub for investment into Australia and the broader Asia Pacific region. This session will outline current market practices and trends in how global investors use Singapore-based entities within consortium investment structures.</p> <p>Speakers will also discuss the commercial and tax considerations that influence jurisdictional choice when structuring cross-border investments.</p>
4:30–5:30pm	<p><b>Session 6: Part IVA: Recent Cases</b> Speakers: Nick Maley, PwC, Rose McEvoy, PwC, Deborah Vegar, Australian Taxation Office</p> <p>This session will examine recent developments in the application of the anti-avoidance provisions and section 45B following key cases, including the High Court decision in PepsiCo.</p> <p>The session will focus on the operation of Part IVA, including the requirement for a “reasonable alternative postulate” and the relationship between the alternative postulate and the purpose test, as well as developments relating to section 45B.</p> <p>Finally, the session will provide context for these developments in the infrastructure sector, highlighting how these issues arise in practice and identifying key considerations in acquisitions and disposals of infrastructure assets.</p>



## Welcome reception

Join your colleagues and conference speakers for an evening of networking at Teahouse, the sophisticated lounge bar at Crown Sydney, offering a stylish setting to unwind and connect.

**Date:** Thursday, 18 June 2026

**Time:** 5:30pm onwards

**Venue:** Teahouse Lounge Bar, Level 3, Crown Sydney

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

**Dress:** Business or business casual

# Technical program

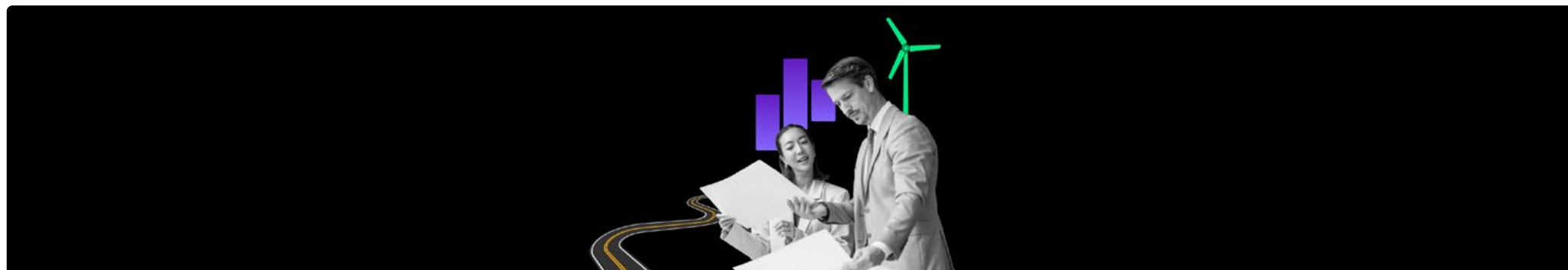
**Day 2**      Friday, 19 June 2026

Time *AEST	Session
8:30 – 9:30am	<p><b>Session 7: Beyond the Hype: AI’s Real Impact on the Tax Function</b> Panellists: Lisa Escudero, CTA, Atlassian, Reagan Gruenthal, Microsoft, Ed Hewings, KPMG Facilitator: Kelly Heezen, Telstra</p> <p>AI is moving rapidly from experimentation to execution in the tax world. In this forward-looking panel, senior tax leaders from global technology organisations and professional services cut through the hype to explore how AI is being used today and where it is heading next. The discussion will unpack real-world use cases and emerging capabilities, alongside the governance, data and risk challenges that come with adoption. Panellists will also examine how AI is reshaping tax advisory, compliance and reporting and what this means for the future of tax practitioners.</p>
9:30 – 10:30am	<p><b>Session 8: Stamp Duty: Every Step You Take... Through an Asset’s Lifecycle</b> Panellists: Cullen Smythe, CTA, KPMG, Vanessa Workman, Brookfield Asset Management Facilitator: Emma Crause, The GPT Group</p> <p>Stamp duty remains one of the most significant and often unpredictable costs in Australian private capital deals. This session provides a roadmap through the evolving stamp duty landscape, from macro trends to granular deal-stage pitfalls that can impact investment returns.</p> <p>Join our expert panel to explore key duty considerations across the full private capital lifecycle, including:</p> <ul style="list-style-type: none"><li>• Fundraising complexities</li><li>• Investment in “living” asset classes</li><li>• Post-investment challenges</li></ul> <p>The session will also explore critical and timely topics such as:</p> <ul style="list-style-type: none"><li>• Aggregation rules and the implications of recent “substantially one arrangement” cases, including Oliver Hume</li><li>• Commercial and Industrial Property Tax (CIPT) reforms and their growing impact on transaction planning</li><li>• Sector-specific surcharges and concessions that can significantly affect deal economics</li></ul> <p>You will also have the opportunity to engage directly with two of the leading experts in this area.</p>
10:30 – 11:00am	<b>Morning tea</b>

# Technical program

**Day 2**      Friday, 19 June 2026 continued

Time *AEST	Session
11:00am – 12:00pm	<p><b>Session 9: Division 250: Who is in Control Here?</b> Speakers: Richard Lambkin, Deloitte, Katrina Piva, KPMG</p> <p>The scale of Australia’s energy transition has led to an increasing role for government in large-scale privately financed economic infrastructure, including as an infrastructure planner for regulated concessions or as an offtaker. These quasi-PPP arrangements sit between the availability payment securitised licence structures typically used for social infrastructure and the user-pays long-term lease concession models adopted for economic infrastructure.</p> <p>Managing Division 250 in the context of new funding models and an expanded role for government is critical to preserving capital allowances and transaction value.</p> <p>In this session, we will cover:</p> <ul style="list-style-type: none"><li>• The drivers behind the increasing prevalence of quasi-PPP arrangements for procuring economic infrastructure, with a focus on the energy sector</li><li>• How Division 250 should be considered in the context of these arrangements</li><li>• Case studies covering approaches to managing the application of Division 250 in a transaction context from both a proponent and government perspective, including ATO engagement</li></ul>
12:00 – 1:00pm	<p><b>Session 10: Inbound Investments: The NZ Approach</b> Panellist: Vivian Cheng, Chapman Tripp Facilitator: Jillian Gardner, Morrison Australia</p> <p>Vivian is a highly experienced New Zealand tax lawyer with a particular focus on transactional tax. In this session, she will provide an overview of key developments in New Zealand’s taxation of inbound investment, highlighting contrasts with the Australian system and issues to consider when structuring investments into New Zealand. The session will also explore potential reforms to the New Zealand tax system, including developments relevant to managed investment structures and other initiatives being considered to encourage foreign investment.</p>



# Technical program

**Day 2** Friday, 19 June 2026 continued

Time *AEST	Session
1:00 – 2:00pm	Lunch
2:00 – 3:00pm	<p><b>Session 11: The Lifecycle of a Private Equity Investment, Managing the ATO’s Evolving Private Capital Focus</b> Speakers: Sandra Farhat, FTI, EY, Jeremy Nash, EY</p> <p>The ATO’s Private Equity program reflects an increasingly coordinated, real-time approach. Through a more iterative process for settling FIRB tax conditions, together with a broader range of review and assurance processes including firm and holding period reviews, substantive review activity is shifting earlier in the investment lifecycle and extending beyond single investments.</p> <p>While familiar focus areas around exit compliance remain, the ATO’s initiative to gain a more holistic understanding of the commercial approach, investment strategy and platform structuring of inbound sponsors requires more timely and fulsome engagement between tax directors, deal leaders and advisers.</p> <p>In this session, the speakers will survey this evolving landscape, share insights from both advisers and industry, and outline practical strategies to enhance review readiness, improve engagement outcomes and manage the widening population of stakeholders</p>
3:00 – 4:00pm	<p><b>Session 12: Practical Tips and Tricks for Managing Infrastructure Settlements</b> Speakers: Richard Buchanan, CTA, Deloitte, Eleanor Ramage, Deloitte</p> <p>Infrastructure projects often involve complex tax positions, multiple stakeholders and significant commercial exposure. Managing disputes and settlements in this environment requires careful coordination, strong technical judgement and effective engagement with the ATO.</p> <p>This session will explore practical considerations when navigating settlement processes in the infrastructure sector, drawing on real experience from practitioners involved in large projects.</p> <p>Topics will include:</p> <ul style="list-style-type: none"><li>• Administrative law considerations in dispute resolution, including settlements and other available avenues</li><li>• Managing tax engagements within consortium structures, including coordination between multiple parties and advisers</li><li>• Practical approaches to engaging with the ATO and maintaining effective working relationships during the settlement process</li></ul>
4:00pm	<p><b>Conference close</b> Speaker: Minh Dao, CTA, Co-Chair, Infrastructure &amp; Investments Tax Conference Organising Committee</p>

# Presenters

**Aaron Bennett** is the Assistant Commissioner for the Private Capital Program in Public Groups at the ATO and is responsible for leading the ATO's Infrastructure 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.

**Richard Buchanan, CTA**, is a partner in the M&A Tax team at Deloitte who specialises in the tax aspects of major infrastructure, real estate, private equity and corporate transactions. In these transactions, Richard leads teams that conduct due diligence, structuring, transaction document drafting and negotiation, liaison with regulatory authorities, model review and post-acquisition integration steps. Richard is also involved in a number of revenue authority engagements, including settlement negotiations, management of audits and risk reviews and private ruling negotiations. Richard first became a partner in 2005 at Deloitte (after beginning his career at Deloitte through university under the Deloitte cadet

program). Richard was then approached to join Greenwoods & Herbert Smith Freehills (G&HSF) and was a partner at G&HSF for approx. 10 years until he was approached to join EY in 2016 (at which time Richard was the leader of the Melbourne office of G&HSF). In his time at a law firm, Richard was consistently recognised as one of Australia's leading tax lawyers in external awards such as Chambers, Asia Pacific 500, Boyle's and Legal Who's Who. Richard rejoined Deloitte in December 2023 in the M&A Tax team. Richard is both a chartered accountant and a solicitor of the Supreme Court of Victoria. Richard is a fellow of the Taxation Institute of Australia and a member of the Law Institute of Victoria. Richard has an honours Commerce/ Law degree from Monash. Richard is a regular presenter at Tax Institute conferences, including the Financial Services Conference, the Victorian Tax Conference and the Infrastructure Conference on multiple occasions.

**Daniel Caltabiano** is a Senior Director at Alvarez & Marsal, based in Sydney. He is a corporate tax advisor to clients who look to develop, hold or operate infrastructure, energy and real estate assets. Daniel's recent experience has had a particular focus on M&A, project

financing transactions and privatisations across energy, utilities, transport, digital and social infrastructure. His core practice includes providing tax structuring, tax due diligence and tax compliance services. Daniel is a member of Chartered Accountants Australia & New Zealand.

**Vivian Cheng** is a tax partner at Chapman Tripp, a leading law firm in New Zealand. She is an experienced tax lawyer with a particular focus on transactional tax, including mergers and acquisitions, transaction structuring, financing transactions, business reorganisations and the taxation of inbound and outbound investments, and is also a recognised expert on the automatic exchange of information under FATCA/CRS. Vivian is one of six members of the Tax System Forum, which provides independent expert guidance to the New Zealand Minister of Revenue on tax policy matters. Vivian is recognised as a Highly Regarded practitioner by ITR World Tax 2025, a Leading Lawyer by Chambers Asia Pacific 2026 and as a Next Generation Partner by Legal 500 Asia Pacific 2026.

**Edward Consett, ATI**, is a Managing Director with Alvarez & Marsal Tax in Melbourne, Australia. Edward specialises

in the planning and execution of core, core plus and value add infrastructure transactions and major projects, with a passion for the investments required to effect Australia's energy transition. Edward has advised domestic and international funds on public and private market infrastructure M&A (planning, diligence, execution), greenfield project structuring and financing, brownfield asset restructuring and refinancing, privatisations and capital management. He also regularly advises industry bodies on tax policy and reform for the infrastructure sector.

**Emma Crause** has over 20 years of experience across various roles in corporate, Big 4 and law firms. She currently serves as Head of Tax at The GPT Group and was previously Senior Vice President – Tax and Head of Tax for Brookfield Property Group Australia / Brookfield Asset Management Australia for 9 years. Her earlier career includes senior tax roles at KPMG, Atanaskovic Hartnell and Clayton Utz. She holds a Master of Laws (Honours), and Bachelor of Commerce from the University of Sydney, and is admitted as a Solicitor of the Supreme Court of NSW. Emma is passionate about mentoring female talent across tax and more generally.

# Presenters

**Minh Dao, CTA**, is a Tax Partner at KPMG and is the National Sector lead for Energy & Utilities. She has over 25 years of tax experience at KPMG working with governments and the private sector on large-scale infrastructure, privatisations and PPP projects. She is actively engaged in both ATO and Treasury consultations on tax issues relevant to the infrastructure sector. In March 2015, Minh won the Tax Institute Corporate Tax Adviser of the Year award. She currently serves as the chair of the IPA tax working group, board director for KPMG Australia and board director for the Canadian Australian Chamber of Commerce.

**Lisa Escudero, CTA**, is the Head of International Tax & Transfer Pricing at Atlassian, a leading Australian enterprise software company that powers companies to build better software. Atlassian is serious about creating amazing products, practices, and open work for all teams. Lisa is serious about making sure Atlassian can do that in a global tax environment. She believes companies like Atlassian can help pave the way for other tech companies and is involved in sharing knowledge through forums such as the Tech Council of Australia and various ATO working

groups. She has over 20 years experience in corporate tax, 10 of which have been immersed in the fast-paced technology industry and the many changes that this industry faces in a digital environment.

**Sandra Farhat, FTI**, joined EY as a Partner in the Tax Controversy and Policy group after a 20-year career at the Australian Taxation Office. She brings a wealth of experience in managing ATO engagements across all key tax areas with a specialisation and focus on transfer pricing and international tax issues. She has a deep understanding of the ATO's engagement and assurance approach and life cycle for public groups and multinational groups. She has led the conduct and resolution of complex tax matters and worked openly and collaboratively to achieve mutually agreeable outcomes. Her experience in dispute resolution includes the largest disputes across the digital economy and life sciences industry, and disputes covering related party financing, structuring and transfer pricing.

**Jillian Gardner** is the Head of Tax for Morrison, a NZ headquartered global investment manager with

assets under management of approximately USD\$30 million. She has extensive experience with complex cross border transactions and asset management with multi-jurisdictional stakeholders primarily in the infrastructure sector. Before joining Morrison, she held a senior role with Macquarie in its Macquarie Asset Management team and was a partner at PwC.

**Kelly Heezen** is the Taxation Executive at Telstra Group Limited, leading a global tax team focused on tax governance, strategic advisory and regulatory engagement. Kelly oversees complex Australian and international tax matters for one of Australia's largest listed companies and is a member of the ATO's Large Business and Stakeholder Group. She is actively involved in consultation on tax law design and administration with Treasury and the ATO. Prior to joining Telstra, Kelly was Head of Tax at AMP Capital Investors, a global investment manager with over \$200 billion under management, leading a global team advising on major domestic and international infrastructure, real estate, unlisted debt and public markets transactions across the full investment lifecycle. Prior to AMP Capital, Kelly practised corporate

and international tax at the Big 4 in Melbourne, Sydney and London.

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

**Costa Koutsis, CTA**, is a Partner at Corrs Chambers Westgarth and leads their state taxes practice. He specialises in stamp duty, land tax, GST and other indirect taxes. With over 24 years of experience, Costa has advised on the indirect tax consequences for a range of transactions, including mergers and acquisitions, restructures and structured property and financing transactions across a variety of industries.

**Luke Imbriano, FTI**, is a partner at Corrs Chambers Westgarth specialising in the provision of income tax advice

# Presenters

on infrastructure projects and dispute resolution services. He advises private sector participants across the infrastructure lifecycle, including asset owners, operators, investors and financial sponsors such as pension and private equity fund managers. Luke supports clients from early-stage structuring and M&A transactions through to managing and resolving complex ATO reviews, audits and disputes. He is known for his strong technical capability, critical thinking and practical commercial approach to resolving complex income tax issues. Luke frequently presents and contributes to consultation on emerging tax developments.

**Richard Lambkin** is a partner at Deloitte with over 25 years' experience advising both private sector and government clients on tax aspects of major economic and social infrastructure transactions particularly in the energy, transport and utilities sectors. This includes tax structuring advice and due diligence for M&A, government asset privatisations, schemes of arrangement, refinancings, restructures and greenfield development transactions. Richard regularly consults with the ATO and Treasury on tax policy matters and has negotiated a wide range of private rulings and other ATO products

to facilitate successful transaction completion. Earlier in his career, Richard spent two years in London advising a range of global funds and asset managers on fund structuring and cross border transactions.

**Liz Lester, CTA**, is a Senior Director for Greystar Australia, responsible for overseeing tax advisory, structuring, and compliance for Greystar's Asia Pacific platform and its managed funds across the Asia Pacific region. With over 25 years of experience, Liz has held senior roles in both professional services and corporate environments, including Greenwoods & Herbert Smith Freehills, Westfield Corporation, KPMG, and PwC in Sydney and London. Her expertise spans real estate taxation, international structuring, and technical tax matters. Liz holds a Law degree from the University of Manchester and a Master of Laws (Taxation) from the University of Sydney. She is a Chartered Tax Adviser and a member of the UK Chartered Institute of Taxation and The Tax Institute, Australia.

**Gina Maio** leads AustralianSuper's tax team globally, responsible for ensuring that the tax aspects of the fund's investment activities and member products sustainably contribute to members' best interests in retirement.

AustralianSuper invests more than A\$400 billion globally across multiple asset classes, including infrastructure, real estate, equities and debt on behalf of its 3.5 million members. Gina engages regularly on law design and administration with both Australian and foreign treasury and revenue authorities. Prior to joining AustralianSuper, Gina spent a decade at KPMG providing tax advisory services in respect of major transactions to ASX-listed corporates, multinationals, pension funds and financial sponsors.

**Nick Maley** is a tax controversy partner and has recently re-joined PwC from the ATO where he was an Assistant Commissioner with responsibility for Engagement & Assurance for Public Groups and Internationals. Nick's current focus is working with inbound multinationals on their engagement with the ATO as well as a focus on M&A. At the ATO, Nick was responsible for a large number of the ATO's reviews, APA's, audits and assurance engagements with technology and ecommerce groups. Amongst other roles, Nick led the ATO's IP Migration Cluster, the ATO's Banking and Finance Strategy and was responsible for the engagement strategy for the Inbound Supply Chain risk area. Nick spent two

years leading the PwC Australian tax desk in New York.

**Rose McEvoy** is a Senior Manager in the Tax Controversy and Dispute Resolution team at PwC. Rose has gained substantial experience in resolving complex federal and state tax disputes, providing guidance to clients on managing revenue authority reviews and achieving negotiated settlements. Rose seeks to achieve commercial outcomes for her clients, which include a range of large multinationals, high wealth individuals and private groups. Rose's primary areas of practice include international tax and transfer pricing disputes and anti-avoidance.

**Jeremy Nash** is a Director in the EY International and Transaction Tax Services team, based in Sydney. Jeremy has over 10 years' experience advising multinational groups and sponsors, with a particular focus on inbound M&A and the US-Australia private capital corridor.

**Michael O'Meara, SC, ATI**, was called to the Bar in 2005 and was appointed Senior Counsel in 2019. He has a wide practice, specialising in the areas of revenue law, commercial law, Corporations law and public law. Michael acts for a diverse range of corporate, private and government clients.

# Presenters

He frequently appears both for and against the Commonwealth and its regulatory agencies, including the Commissioner of Taxation, the Australian Competition and Consumer Commission and the Australian Securities and Investment Commission. Michael regularly appears in the Administrative Appeals Tribunal, the Federal Court of Australia, the Supreme Court of New South Wales, the High Court of Australia, together with other State and Territory Supreme Courts. Michael has appeared in a large number of significant constitutional and revenue cases in the High Court of Australia and the Full Court of the Federal Court of Australia. Michael graduated from the Australian National University in 2000 with a University Medal in Law and the Supreme Court Judges' Prize. He has a Masters in Law and a Masters in Taxation from Sydney University. Prior to coming to the Bar he was a Senior Associate at Minter Ellison.

**Katrina Piva** is a Partner at KPMG in the Deal Advisory, Tax practice. Katrina has extensive experience in advising clients on transactions, with particular focus on the infrastructure, energy and private equity sectors. Katrina is passionate about providing her clients with pragmatic, commercial advice in a transaction, and is constantly keeping

up to date with new trends impacting the sector and how best to manage them.

**Blake Sly** is a Senior Director in the Public Groups Private Capital Program of the ATO which has oversight of the Private Equity, Collective Investment Vehicle (CIV), Infrastructure and Foreign Fund Strategy teams, the Private Capital Engagement team and CIV Top 1000 assurance team. Blake has previously held a number of roles across the ATO including Senior Director Investment Industry Strategy which included oversight over insurance companies, large APRA regulated superannuation funds and managed investment funds and Director roles in PG Infrastructure Strategy and PG Engagement and Assurance.

**Cullen Smythe, CTA**, is a partner at KPMG in the Deals Tax team. He has more than 30 years experience as a professional advisor specialising in State taxes, including almost a decade as the Commissioner of State Revenue for NSW. His experience covers all Australian jurisdictions and spans M&A, property, financial services, infrastructure, mining and energy and government revenue administration as well as the Australian implications of international restructures and cross border transactions. He is a

solicitor of the Supreme Court of NSW, a member of the New York State Bar, the Texas State Bar and Texas Bar College.

**Jayde Thompson** is a Managing Director with Alvarez & Marsal Tax in Melbourne. With over 16 years of experience in corporate international taxation, M&A, cross-border-related party arrangements and tax policy considerations. Jayde spent two years in New York advising US multinational companies and has also worked with the Board of Taxation on various policy considerations.

**Eleanor Ramage** is a Managing Associate with Deloitte Legal in Melbourne, Australia. She specialises in international tax law, tax controversy and M&A and private equity transactions. Eleanor has 10 years of experience in Australian tax law and is a qualified solicitor. Eleanor has experience with tax authority engagement including applications for rulings, audits and other disputes and settlements. Eleanor has advised many international clients investing into Australia and Australian-based multinationals doing business outside Australia on the tax aspects of major transactions. Prior to joining Deloitte in 2023, Eleanor worked as in-house counsel in the International Tax team of one of Australia's largest

taxpayers. Eleanor has a Bachelor of Laws (Hons) / Bachelor of Arts from Monash University and Master of Laws from the University of Melbourne.

**Deborah Vegar** is an Assistant Commissioner of the Tax Counsel Network within the Law Design and Practice Group of the Australian Taxation Office. In Deborah's current role, she primarily provides technical and strategic guidance on international tax issues in audits, litigation, public advice and guidance and tax policy and law development projects. Deborah is also a member of the ATO's General Anti-Avoidance Rules Panel which provides independent advice to ATO decision makers on the application of Australia's anti-avoidance rules to matters referred to it.

**Vanessa Workman** is the Vice President, Tax, Real Estate at Brookfield Asset Management and has over 18 years experience in Stamp duty, Land Tax and GST. Vanessa has advised on a broad spectrum of income tax and indirect taxes, across a wide range of transaction structures and industries, including real estate, infrastructure and private equity. She has extensive experience in M&A transactions, restructures and financing transactions.

# Venue and accommodation



## Crown Sydney

1 Barangaroo Ave, Barangaroo, NSW 2000

Crown Sydney offers sophisticated design that reflects its spectacular harbourside location, paired with personalised service and world-class dining and facilities. Located in the vibrant Barangaroo precinct, the venue is surrounded by parklands, laneway bars, public art and sweeping harbour views, delivering a truly distinctive Sydney experience.

### Getting there

Crown Sydney is located on the Barangaroo waterfront, just moments from the heart of the Sydney CBD. Sydney Airport is approximately 15 kilometres from the hotel. The closest train station is Wynyard Station, a 9-minute walk to Crown Sydney. The nearest light rail stop is Bridge Street, serviced by the L2 and L3 lines, which is an 11-minute walk away. The Barangaroo South bus stop on Hickson Road is the closest bus stop, located approximately a 3-minute walk from the venue.

### Parking

Valet parking is available through the hotel's Bell Desk team at a rate of \$80 per 24 hours.

Alternatively, the Barangaroo Reserve car park is located approximately a 10-minute walk from Crown Sydney. For current parking rates and to book in advance, please visit: <https://www.carepark.com.au/find-a-care-park/barangaroo-reserve>.

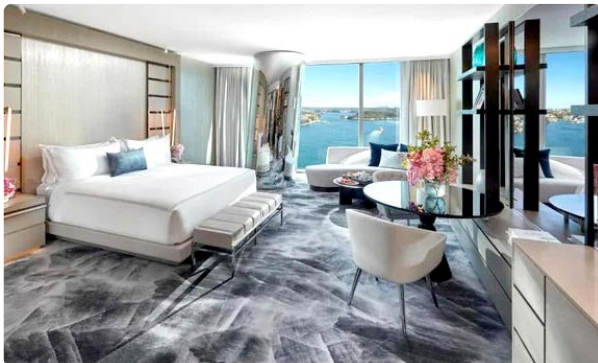
The closest Wilsons public car park is also located at Barangaroo Reserve. Please note that this car park does not operate 24 hours.

For additional information on parking and transport options, please visit: <https://www.crownsydney.com.au/general/getting-here>.

### Accommodation

Accommodation at Crown Sydney can be booked via the hotel booking link <https://www.crownsydney.com.au/hotel>.

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, including the Networking reception.

## 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 reception

The networking reception will be held directly following the last session on Thursday from 5:30pm at Teahouse, the lounge bar at Crown Sydney. The Networking reception

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, 15 May 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 lesser 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 16 for registration inclusions.

#### Full registration – 12 CPD hours

	Member	New member*	Non-member
<b>Face to face Early bird registration</b> Register on or before 15 May 2026	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$2,315	<input type="checkbox"/> \$2,195
<b>Face to face Standard registration</b> Register after 15 May 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 reception

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

Thursday, 18 June 2026 at Teahouse, the lounge bar at Crown Sydney.

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

No.  x tickets at \$80 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:

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](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 the conversation

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-  [twitter.com/taxinstituteoz](https://twitter.com/taxinstituteoz)
-  [instagram.com/thetaxinstitute\\_](https://www.instagram.com/thetaxinstitute_)

