

NSW  
Tax  
Forum



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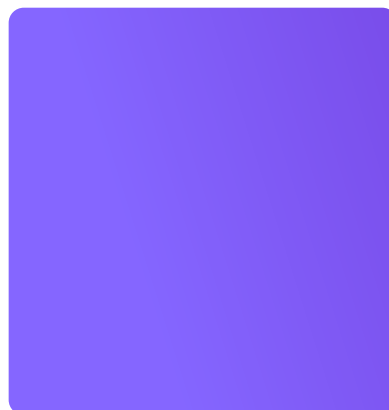
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# Welcome

The NSW Tax Forum remains one of Australia's premier tax events, bringing together leading tax professionals for discussion, learning and connection. The 2026 program has been carefully curated to reflect the increasing complexity of the tax landscape, ensuring practitioners at every level gain relevant insights to stay ahead.

If you work in tax or advise on tax matters, this is an event you need to attend. With three dedicated streams – **SME**, **Corporate** and **Hot Topics (including Next Generation)**, you will gain access to timely technical updates and practical insights to support you, your team and your clients.

## Practical insight across key tax areas

The **SME stream** is designed for professionals advising private businesses, family groups and high net worth clients. It focuses on the practical and technical challenges faced by SME advisers, including structuring and restructuring, trusts and Division 7A, asset protection, estate and succession planning, ATO engagement, and managing risk in an increasingly complex regulatory environment.

The **Corporate stream** is designed to address the tax issues faced by large and complex organisations. The 2026 program explores domestic and international tax developments, integrity and anti-avoidance measures, capital management, major transactions, litigation and dispute strategy, and the evolving impact of global reform, technology and economic change on corporate tax functions.

The **Hot Topics stream** focuses on the most current and fast-moving areas of tax, addressing emerging risks, regulatory change and issues that are front of mind for practitioners. Sessions span state and indirect taxes, superannuation, ethics and governance, private equity and complex transactions, global trade and customs, and the growing role of technology and AI in tax practice.

Within the Hot Topics stream, the **Next Generation mini-stream** features four dedicated sessions for those new to the profession or for those wanting a refresher on some key topics and core skills including The 'Tax' Professional, the tax treatment of cryptocurrency and digital assets, the implications of Payday Super, and thinking independently.

## A leading event for tax professionals

The NSW Tax Forum is designed to spark conversation, challenge thinking and provide practical takeaways you can apply immediately. With more than 700 tax professionals attending each year, it remains a cornerstone event for the profession.

We look forward to welcoming you and your team to **Sofitel Sydney Wentworth on 21-22 May 2026**.

**Early bird pricing offer**  
**Register on or before Friday 24 April 2026**  
**to save!**



**Nick Panos, CTA**  
Chair, SME Stream  
Sub-Committee



**Annemarie Wilmore**  
Chair, Corporate Stream  
Sub-Committee



**Nick Gangemi, CTA**  
Chair, Hot Topics Stream  
Sub-Committee

# Program at a glance

## SME

Division 7A and Trusts

Trust Distributions and Family Trust Elections

Business Restructuring: Options for SME Groups

Practical Considerations, Strategies and Consequences of Winding Up

Death and the Small Business CGT Concessions

Managing Pre-CGT Assets in SME Groups: Division 149, the ART Ruling and K6

Professional Services Allocation for SMEs: High-Risk PSI and Part IVA Traps

Managing ATO Audits

SMSFs: Division 296 and ATO Regulatory Issues

Modern Estate Planning for Private Groups: Managing Cross-Border Estate Issues

Private Use of Business Assets: Where Are We Now?

Year-End Trustee Resolutions

Asset Protection

Family Law in Property Settlements

## CORPORATE

US Political Shifts: Cross-Border Impacts for Australia and our region

Pillar 2 and Tax Transparency

Thin Cap

Applying the Key R&D Integrity Provisions

Head of Tax Panel: Navigating Complexity

Integrating Data Governance to Enable Responsible AI in Tax Administration

Litigation Strategy

Tax Reform

Managing Transfer Pricing and International Tax Obligations in 2026

Part IVA: Anti-Avoidance Focus

IP and Royalty Developments: Oracle and PepsiCo Case Update

Mergers and Divestments: Topical Issues and FIRB Engagement

A Deep Dive into Capital Management

General Case Update

## HOT TOPICS

Superannuation Cap

Trade in Turmoil: Customs, Tariffs and Strategic Planning in a Disrupted Global Environment

Land Tax Exemptions: Increasingly Difficult to Obtain

Could Your Client Be an Accidental SGE? Understanding the Triggers and the Implications

AI in Practice: Perspectives from Practitioners and the ATO

Ethics for Tax Agents

Taxation of Private Equity Transactions: Acquisition, Holding to Exit

What's Hot in GST?

Payroll Tax

Grouping Rules Across Income Tax, GST and State Taxes

## NEXT GENERATION

The 'Tax' Professional

Tax Treatment of Cryptocurrency and Digital Assets

Implications of Payday Super

Thinking Independently

# Technical program

**Day 1** Thursday, 21 May 2026

Time	SME stream	Corporate stream	Hot Topics stream
8:00 – 8:30am	Registration		
8:30 – 9:30am	<p><b>Session 1A: Division 7A and Trusts</b>  <b>Speaker: Danielle Constantine, William Buck</b>            Division 7A remains a challenging area for SME practitioners, especially where trusts and private groups are involved. Recent judicial decisions have shifted key principles, increasing the need for practical and compliant solutions.</p> <p>This session will give a current overview of Division 7A issues affecting trusts, drawing on recent case law and ATO guidance. Presenters will outline the practical implications for advisers, common problem areas and strategies to manage Division 7A exposure.</p>	<p><b>Session 1B: US Political Shifts: Cross-Border Impacts for Australia and our region</b>  <b>Speakers: Alia Lum, CTA, KPMG, Peter Oliver, CTA, KPMG</b></p> <p>The evolving US political landscape continues to influence global tax policy, creating material implications for Australian corporate groups with US connections. This session will examine key US tax policy trends under the current administration and how they are shaping tax policy reactions globally and across our region. Within an environment of increasing policy uncertainty, we will consider the practical impacts on Australian businesses operating or expanding in the US, and considerations for US-headquartered groups with Australian subsidiaries. The session will also explore strategies to manage compliance and uncertainty, as well as the risks and opportunities emerging for Australian entities navigating US cross-border settings.</p>	<p><b>Session 1C: Superannuation Cap</b>  <b>Speaker: Graeme Colley, The Auditors Institute</b></p> <p>This session provides a practical look at the superannuation cap changes and what they mean in the post-implementation landscape. With the dust now settled, the session will explore how individuals below the cap are treated under CPI protection, what the changes mean for those with balances between \$3 million and \$10 million and whether very large balances still have viable planning options. The discussion will consider how outcomes vary depending on an individual's balance, how alternative strategies stack up over a lifetime and the implications for estate planning.</p>
9:30 – 10:30am	<p><b>Session 2A: Trust Distributions and Family Trust Elections</b>  <b>Speaker: Jane Harris, CTA, Brown Wright Stein Lawyers</b></p> <p>This session provides a deep dive into the tax implications and compliance risks associated with trust distributions and family trust elections (FTEs). With the ATO's increasingly rigid approach to family trust distribution tax and the strict application of the family group rules, practitioners must be vigilant in managing FTEs, interposed entity elections (IEEs) and beneficiary distributions.</p> <p>The session will explore governance strategies and practical risk mitigation techniques in managing trust distributions.</p>	<p><b>Session 2B: Pillar 2 and Tax Transparency</b>  <b>Speaker: Jayde Thompson, Alvarez &amp; Marsal</b></p> <p>This session is an exploration of Pillar 2 and the expanding international transparency measures reshaping the corporate tax landscape. The discussion will cover the practical implications of Pillar 2 and US side-by-side reporting, what increased disclosure means for multinational groups and how organisations can prepare for greater visibility and regulatory expectations. It will also touch on compliance challenges, data readiness and the broader impact on governance and risk management from a Pillar 2 and US side-by-side reporting perspective.</p>	<p><b>Session 2C: Trade in Turmoil: Customs, Tariffs and Strategic Planning in a Disrupted Global Environment</b>  <b>Speaker: Richard Nutt, Grant Thornton</b></p> <p>This session will provide an overview of Australia's customs and tariff framework with a focus on recent global trade disruptions. Attendees will gain practical insights into compliance, valuation and strategic planning in the face of rising protectionism and shifting bilateral trade dynamics.</p>

# Technical program

**Day 1** Thursday, 21 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
10:30–11:00am	Morning tea		
11:00am–12:00pm	<p><b>Session 3A: Business Restructuring: Options for SME Groups</b>  <b>Speaker: Spyros Kotsopoulos, CTA, Deloitte</b></p> <p>Many private enterprises evolve organically to a point where entities are used for multiple, and sometimes incompatible, purposes. This often creates the need to restructure into a form that better supports current requirements or future plans.</p> <p>This session will explore the key alternatives available for restructuring, including:</p> <ul style="list-style-type: none"> <li>• Determining the appropriate vehicles or structures for different purposes</li> <li>• Options for restructure (rollover, sale of entity interests and sale of assets)</li> <li>• Relevant rollovers that may be available (key rollovers, including Subdivision 122-A, Subdivision 122-B, Subdivision 124-M, Subdivision 124-N, Division 125, Division 615 and Subdivision 126-G)</li> <li>• Timing of a restructure and “back-to-back” rollover considerations.</li> </ul>	<p><b>Session 3B: Thin Cap</b>  <b>Speakers: Clement Lui, PwC Australia, James Nickless, PwC Australia</b></p> <p>This session provides a practical update on the new thin capitalisation rules and their impact on corporate taxpayers. The discussion will cover the operation of the debt deduction rules, key points from recent ATO guidance and examples, and the emerging questions arising from the first round of filings. It will also walk through the group ratio test and third party debt test, highlighting common challenges and important considerations for compliance and planning.</p>	<p><b>Session 3C: Land Tax Exemptions: Increasingly Difficult to Obtain</b>  <b>Speaker: Matthew McKee, FTI, Brown Wright Stein Lawyers</b></p> <p>As land values continue to rise across NSW and thresholds remain frozen, land tax is emerging as a significant cost for property owners – particularly those relying on exemptions. This session provides a detailed analysis of the principal place of residence (PPR) and primary production exemptions under the <i>Land Tax Management Act 1956</i> (NSW). We will explore the 2024 amendments to the PPR exemption, including the 25% ownership threshold, and dissect complex tribunal and court rulings that have reshaped the interpretation of “dominant use” for primary production. Attendees will gain practical insights into exemption substantiation, audit risk management and the broader implications of the complexity of the provisions in a high-value property environment.</p>

# Technical program

**Day 1** Thursday, 21 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
12:00 – 1:00pm	<p><b>Session 4A: Practical Considerations, Strategies and Consequences of Winding Up</b>  <b>Speaker: Adrian Bailey, CTA, Cleary Hoare</b></p> <p>When a client’s company reaches the end of its life cycle, advisers play a critical role in guiding the winding-up process. This session explores the tax consequences that arise on liquidation and the strategies available to optimise outcomes. It will cover the treatment of pre-CGT assets, amounts representing small business concessions, retained profits and distributions made during liquidation, as well as the key traps and practical issues practitioners need to be aware of.</p>	<p><b>Session 4B: Applying the Key R&amp;D Integrity Provisions</b>  <b>Speaker: Bryan Soepardi, ATI, RSM Australia</b></p> <p>This session provides an overview of the key integrity measures within the R&amp;D Tax Incentive (RDTI) regime, focusing on key compliance risks and their practical application. The discussion will cover the current regulatory landscape and the compliance priorities of the ATO and the Department of Industry, Science and Resources (DISR), outline RDTI exclusions and explain the “by or for” and “at risk” tests for determining eligible expenditures.</p> <p>The session will also address the payments to associates rules, and other issues involving group mark-ups and non-arm’s length transactions.</p>	<p><b>Session 4C: Could Your Client Be an Accidental SGE? Understanding the Triggers and the Implications</b>  <b>Speakers: Steven Che, EY, Gamil Tadros, EY</b></p> <p>This session will explore how a client may unintentionally fall within the definition of a significant global entity (SGE) and the implications that follow. It will clarify the scope of the SGE rules, highlight common scenarios where SGE status can be triggered, and outline the tax and reporting obligations that arise once a client is captured. Practical guidance will be provided on monitoring group structures, reassessing SGE status as circumstances change and managing the significant penalties associated with non-compliance.</p>
1:00 – 2:00pm	Lunch and annual meeting of the State		



# Technical program

**Day 1** Thursday, 21 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
2:00–3:00pm	<p><b>Session 5A: Death and the Small Business CGT Concessions</b>  <b>Speaker:</b> Peter Bardos, CTA, HLB Mann Judd</p> <p>The small business CGT concessions take on an added layer of complexity when a taxpayer dies. This session examines how Division 152 interacts with the CGT rules on death, including when the concessions can be accessed by a legal personal representative or beneficiaries, and the impact of timing, asset ownership and structure leading up to death. It will also explore practical problem areas such as satisfying the significant individual and active asset tests, handling pre-CGT assets, and navigating ATO integrity concerns where concessions are sought as part of succession or estate planning.</p>	<p><b>Session 5B: Head of Tax Panel: Navigating Complexity</b>  <b>Panellists:</b> Catherine Feng, Origin Energy Limited, Jillian Gardner, Morrison Australia, Miryam Meza, CTA, CIMIC  <b>Facilitator:</b> Fiona Moore, CTA, EY</p> <p>In this panel discussion, we will explore the current challenges and opportunities in operating a modern tax function. The conversation will cover emerging trends in tax policy, technology and risk management, along with practical insights on how tax leaders are responding to increasing complexity. The panel will also share real-world approaches to managing stakeholder expectations, strengthening governance and positioning the tax function to add strategic value within the business.</p>	<p><b>Session 5C: AI in Practice: Perspectives from Practitioners and the ATO</b>  <b>Panellists:</b> Andrew Clements, FTI, King &amp; Wood Mallesons, Denise Parker, EY, Andrew Watson, Australian Taxation Office  <b>Facilitator:</b> Michael Walpole, CTA, University of NSW</p> <p>This session will provide a practical exploration of how AI is being used across the tax landscape from both practitioner and ATO perspectives. The session will consider how widespread AI has become within firms, the risks involved in using AI to support tax advice and what an effective risk management model looks like. It will also examine the ATO's position on AI, including the ATO's AI strategy, data and analytics foundations, ethics and governance. The discussion will highlight the importance of professional judgement and outline the skills and training practitioners need as AI adoption accelerates.</p>
3:00–3:30pm	Afternoon tea		



# Technical program

**Day 1** Thursday, 21 May 2026 continued

Time	SME stream	Corporate stream	Next Generation stream
3:30–4:30pm	<p><b>Session 6A: Managing Pre-CGT Assets in SME Groups: Division 149, the ART Ruling and K6</b>  <b>Speaker: Ned Galloway, SW Accountants &amp; Advisors</b></p> <p>This session will explore the Division 149 ART decision in <i>XLZH and Commissioner of Taxation [2025] ARTA 2154</i> and its implications for advisers, including how it interacts with the K6 rules in situations involving changes in underlying ownership. The session will break down the key outcomes, the complexity of tracing beneficiary interests, and the practical considerations practitioners need to be aware of when dealing with pre-CGT assets.</p>	<p><b>Session 6B: Integrating Data Governance to Enable Responsible AI in Tax Administration</b>  <b>Speakers: Shiva Ganapuram, Australian Taxation Office, Dr Hongjian Fan, Australian Taxation Office</b></p> <p>The session will highlight the ATO’s use of data, analytics and technology to drive compliance and risk assessment, as well as alternative innovations being adopted across government and industry. Attendees will gain insights into current capabilities, future developments and what corporate tax teams should be preparing for now.</p>	<p><b>Session 6C: The ‘Tax’ Professional</b>  <b>Speaker: Tony Frost, Principal, Frost Leadership Consulting</b></p> <p>What does it mean to be a “tax professional” in 2026? This session firstly explores some unchanging elements of being a professional trusted by clients to solve their problems in an astute and commercial manner. The session will then consider the unique issues faced by modern tax professionals, including the challenges and opportunities thrown up by complexity in all its guises and the emergence of artificial intelligence as a tool to be used and mastered.</p>



# Technical program

**Day 1** Thursday, 21 May 2026 continued

Time	SME stream	Corporate stream	Next Generation stream
4:30 – 5:30pm	<p><b>Session 7A: Professional Services Allocation for SMEs: High-Risk PSI and Part IVA Traps</b>  <b>Speaker:</b> Jake Berger, ATI, Pitcher Partners</p> <p>This session takes a closer look at the ATO’s approach to professional services income allocation and the high-risk features highlighted in recent guidance. With an increasing focus on how income is distributed within professional firms, the session will outline the ATO’s key risk indicators, common structures attracting review and the behaviours that elevate a taxpayer into a higher risk category. It will also discuss practical steps for advisers to assess client arrangements, strengthen documentation and manage ATO engagement where risk is identified. In addition, the session will consider recent rulings issued by the ATO on personal services income that tangentially relate to the issue.</p>	<p><b>Session 7B: Litigation Strategy</b>  <b>Speaker:</b> Rebecca Saint, Australian Taxation Office</p> <p>This session will explore the ATO’s current litigation strategies through the lens of recent cases impacting the corporate tax environment, including the decision in <i>Oracle</i>. It will examine how the ATO is approaching disputes and highlight the key focus areas emerging in tax litigation. This examination of recent litigation will show how litigation plays a vital role in setting precedent, shaping the tax system and providing transparency and clarity for all taxpayers and the ATO.</p>	<p><b>Session 7C: Tax Treatment of Cryptocurrency and Digital Assets</b>  <b>Speaker:</b> Alexander King, HLB Mann Judd</p> <p>This is a practical session designed for early-career professionals looking to build confidence in advising on cryptocurrency and digital assets. The session will outline the core tax principles, including income tax and CGT treatment, compliance expectations and common traps. Attendees will also gain insights into the regulatory and related trends in Australia and overseas shaping the future of digital assets and what advisers need to be aware of now.</p>



## Networking function

Join your colleagues, peers and our esteemed presenters for an evening of drinks, canapes and networking at the Sofitel Sydney Wentworth.

**Date:** Thursday, 21 May 2026

**Time:** 5:30–7:30pm

**Venue:** Sofitel Sydney Wentworth

**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, 22 May 2026

Time	SME stream	Corporate stream	Next Generation stream
8:00 – 8:30am	Registration		
8:30 – 9:30am	<p><b>Session 8A: Managing ATO Audits</b>  <b>Speaker: Peter Kramer, ATI, Bartier Perry Lawyers</b></p> <p>This session provides a practical overview of ATO audits and will explore the scope of the ATO's amendment powers. It will cover the key stages of an audit, the rules around amendment periods, how penalties are applied and strategies for seeking remission. The session will also touch on key administrative considerations to help advisers navigate audit activity with confidence.</p>	<p><b>Session 8B: Tax Reform</b>  <b>Panellists: Julie Abdalla, FTI, The Tax Institute, Peter Feros, CTA, Johnson Winter Slattery, Ermelinda Kovacs, Ground Floor Wentworth Chambers</b>  <b>Facilitator: Andrew Sharp, Alvarez &amp; Marsal</b></p> <p>Australia's tax system was designed for a different economy and a different population profile. This session asks whether the current mix of corporate and income tax settings helps young Australians build prosperity, or simply protects the wealth of those who already have it.</p> <p>From capital gains concessions and dividend imputation to housing affordability and intergenerational equity, Australia's tax architecture has become the focus of renewed debate. Are our policy levers fit for purpose in an era of low productivity, widening wealth gaps and generational imbalance?</p> <p>This session brings together voices from across the tax landscape to ask what genuine reform could look like and how we can move from talking about reform to delivering it.</p>	<p><b>Session 8C: Implications of Payday Super</b>  <b>Speaker: Craig Day, Colonial First State</b></p> <p>Payday Super is a seismic change to the superannuation guarantee charge system and the way in which small businesses manage their superannuation obligations. The impact will flow onto a business's cash flow management and reporting systems. This session will walk through the Payday Super system and complete a before-and-after analysis, showing how Payday Super affects clients.</p>

# Technical program

**Day 2** Friday, 22 May 2026 continued

Time	SME stream	Corporate stream	Next Generation stream
9:30–10:30am	<p><b>Session 9A: SMSFs: Division 296 and ATO Regulatory Issues</b>  <b>Speaker: David Barrett, CTA, Pax Services</b></p> <p>In this session we will address the latest changes in the superannuation and SMSF space, including the Division 296 changes and relevant issues related to Division 296 implementation and its application and implications. The session also addresses the latest on relevant tax and regulatory issues.</p>	<p><b>Session 9B: Managing Transfer Pricing and International Tax Obligations in 2026</b>  <b>Speakers: Elizabeth Jools, Pitcher Partners, Lirize Loots, ATI, Pitcher Partners</b></p> <p>This session will be a practical session aimed at consolidating the maelstrom of international tax and transfer pricing obligations and risks for corporates, particularly from the perspective of an Australian CBCRE (country-by-country reporting entity), to manage in 2026. The session will summarise the compliance landscape, illustrate what this means for a taxpayer in a 12-month period with an illustrative timeline focusing on country-by-country reporting (public and private), income tax return preparation and compliance with Australian transfer pricing rules. The presenters will discuss the expanded scope and complexity of managing stakeholders within the corporate entity and third parties (e.g. auditors) and offer a practical insight into potential considerations and challenges. The session will deep dive into the increased connectivity between transfer pricing and international tax disclosures, analysis and documentation of positions, using the new Australian Local File Short Form disclosures as an example. The session will culminate with a discussion around what this means for identifying and managing risks and engaging with the board and/or group on these topics.</p>	<p><b>Session 9C: Thinking Independently</b>  <b>Speaker: Ed Hewings, KPMG</b></p> <p>With unprecedented access to data and rapidly evolving tools, the way tax professionals research and form advice is changing. This session will explore how access to vast digital resources, search engines and now AI has transformed the profession from the days of loose-leaf services to near-instant draft advice. It will consider the limitations and risks of relying on AI, including errors, bias and over-dependence, and ask whether practitioners are losing the ability to think independently. The discussion will also address how to approach issues that have not yet been written about, and why critical thinking remains essential for the next generation of tax professionals.</p>

# Technical program

**Day 2** Friday, 22 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
10:30-11:00am	Morning tea		
11:00am-12:00pm	<p><b>Session 10A: Modern Estate Planning for Private Groups: Managing Cross-Border Estate Issues</b>  <b>Speaker: Lisa To, CTA, Bartier Perry Lawyers</b></p> <p>This session uses practical case studies to explore the growing complexity of estate planning for families with members and assets spread across multiple countries. We will look at the impact of mobility, cross-border wealth transfers and the issues that arise when beneficiaries living overseas inherit assets in Australia or live in Australia with assets held offshore.</p> <p>The session will work through key technical areas, including section 99B, foreign trustee exposure, surcharge regimes and entity structuring considerations. We will also cover the practical challenges for executors and advisers when administering estates that involve assets and beneficiaries across different jurisdictions.</p>	<p><b>Session 10B: Part IVA: Anti-Avoidance Focus</b>  <b>Speaker: Peter Walmsley, Australian Taxation Office</b></p> <p>This session will take an in-depth look at the current anti-avoidance landscape through recent Part IVA activity. The session will examine the Commissioner’s evolving approach, including instances where it has taken an unusual direction, and how the courts have reached different conclusions in key decisions. It will outline the practical considerations for advisers when assessing arrangements, identifying risk factors and managing exposure under Part IVA in a shifting interpretive environment.</p>	<p><b>Session 10C: Ethics for Tax Agents</b>  <b>Speaker: Bruce Collins, CTA, Tax Controversy Partners</b></p> <p>It’s a brave new world for tax agents – despite all of the assurances, we still have little idea how the new ethical requirements for tax agents will operate in practice.</p> <p>There are contentious issues around:</p> <ul style="list-style-type: none"> <li>• Impacts of the recent changes to the regulatory settings</li> <li>• Mandatory breach reporting – e.g. remaining subjective in determining what constitutes a “significant” breach</li> <li>• Are there exceptions to breach reporting obligations, in practice?</li> <li>• What happens to professional relationships in breach reporting?</li> <li>• Is there liability or reputational harm from misjudging a situation?</li> <li>• What are the implications of reporting your own clients?</li> <li>• What is a false or misleading statement?</li> <li>• Is there tax agent accountability for client omissions?</li> <li>• Is there pressure to more fully scrutinise client documentation?</li> <li>• What, if any, are the protections for agents?</li> </ul>

# Technical program

**Day 2** Friday, 22 May 2026 *continued*

Time	SME stream	Corporate stream	Hot Topics stream
12:00 – 1:00pm	<p><b>Session 11A: Private Use of Business Assets: Where Are We Now?</b>  <b>Speakers:</b> Peter Cohilj, FTI, Kelly Partners Tax Consulting, Charm Jayatileka, Kelly Partners Tax Consulting</p> <p>Private use of business assets continues to create significant uncertainty for SMEs. This session explores when such use gives rise to Division 7A issues, when it triggers FBT and how it affects the business's GST position. It will also examine the recent Federal Court decision in <i>Commissioner of Taxation v SEPL Pty Ltd</i> [2025] FCA 581, which has significant implications for when FBT may apply to directors of trustee companies. Practical strategies for managing exposures and reducing compliance risks will be discussed.</p>	<p><b>Session 11B: IP and Royalty Developments: Oracle and PepsiCo Case Update</b>  <b>Speaker:</b> Sandra Farhat, FTI, EY</p> <p>This session is an examination of key developments in IP and royalty taxation, focusing on the Oracle treaty and <i>MAP</i> case and the implications of the recent <i>PepsiCo</i> decision. With the High Court's <i>PepsiCo</i> decision now more than six months on, the discussion will consider what it means for inbound groups, how royalty characterisation is being approached and the practical issues emerging for multinational structures. It will also outline the broader themes arising from recent ATO activity in this area.</p>	<p><b>Session 11C: Taxation of Private Equity Transactions: Acquisition, Holding to Exit</b>  <b>Speaker:</b> Andy Milidoni, CTA, Mills Oakley</p> <p>The ATO's focus on private equity transactions continues to gather momentum. With increased disclosures being made through the Foreign Investment Review Board process, to early engagements and through Top 100 and to Next 5,000 reviews, tax risk in structuring private equity transactions and managing exits remains high. The session will look at the tax issues arising from private equity transactions, including the use of back-to-back rollovers in the pre-sale/sale phase and the ATO's latest position in respect of them.</p>
1:00 – 2:00pm	Lunch		



# Technical program

**Day 2** Friday, 22 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
2:00 – 3:00pm	<p><b>Session 12A: Year-End Trustee Resolutions</b>  <b>Speaker:</b> Arda Ahmed, ATI, Norton &amp; Quay Tax Law</p> <p>Trusts are widely used in the SME market, but year-end trustee resolutions can create real risk if the documentation, timing or income characterisation is wrong. This session explores common problem areas at the intersection of trust law and tax law, with a focus on practical drafting and review.</p> <p>This session will cover:</p> <ul style="list-style-type: none"> <li>• Drafting and managing year-end trustee resolutions, including practical approaches to trust income determination and streaming capital gains and franked distributions</li> <li>• Key integrity provisions that may apply to trustee resolutions, including sections 99B and 100A, and Division 7A in Part III of the <i>Income Tax Assessment Act 1936</i> (Cth) (the 1936 Act)</li> <li>• Circumstances where Part IVA of the 1936 Act may apply to outcomes achieved through trustee resolutions</li> <li>• Recent tax cases and current risk themes in trustee resolution disputes.</li> </ul>	<p><b>Session 12B: Mergers and Divestments: Topical Issues and FIRB Engagement</b>  <b>Speakers:</b> Cameron Blackwood, ATI, Corrs Chambers Westgarth, Julia Bolodurina, Corrs Chambers Westgarth</p> <p>This session will provide an update on the relevant issues being encountered in mergers and divestments with a focus on engagement with the Foreign Investment Review Board and the Australian Taxation Office prior to acquisition and on divestment, as well outlining the key issues that the ATO is raising as part of these engagement processes, including issues being raised by the private equity task force.</p>	<p><b>Session 12C: What's Hot in GST?</b>  <b>Speaker:</b> Andrew Sommer, CTA, King &amp; Wood Mallesons</p> <p>The GST is 25 years old and still creates issues for taxpayers. While substantive legislative reform remains elusive, the practical experience of GST continues to evolve through important new court decisions and changes in the Commissioner's approach.</p> <p>This session will explore the main subjects that are currently hot in GST, including: (a) the approach to property developments and project delivery agreements in light of <i>Geocon v Commissioner of Taxation</i>; (b) the Commissioner's and taxpayers' opposing views on contentious aspects of the legislation such as Divisions 93 and 142; and (c) the perennial problems associated with missing trader fraud and the Commissioner's approach to Division 165 and anti-avoidance.</p>
3:00 – 3:30pm	Afternoon tea		

# Technical program

**Day 2**      Friday, 22 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
3:30–4:30pm	<p><b>Session 13A: Asset Protection</b>            Panellists: Donal Griffin, Legacy Law, Karina Ralston, Coleman Greig Lawyers, Louisa Sijabat, Merchants Advisory            Facilitator: Sam Ayoubi, AHS Legal Services</p> <p>This session will explore key asset protection issues and the potential strategies that arise at critical moments in a client’s life or business cycle. The panel will examine the implications of family law, business structuring and disputes, providing practical insights for advisers managing risk across complex scenarios.</p> <p>Topics to be covered include:</p> <ul style="list-style-type: none"> <li>• Asset protection considerations when giving structuring advice</li> <li>• Small business restructuring and its asset protection implications</li> <li>• Related party transactions and supporting evidence (loans and gifts)</li> <li>• Family provision claims (NSW only) and estoppel claims</li> <li>• Bankruptcy risks</li> <li>• Deceased estates and succession disputes</li> <li>• Marriage breakdown</li> <li>• Litigation matters.</li> </ul>	<p><b>Session 13B: A Deep Dive into Capital Management</b>            Speaker: Mark Hadassin, CTA, Deloitte</p> <p>This session will revisit key fundamentals, including how dividends, on- and off-market buybacks, and capital returns are taxed. Issues explored will include the attachment of franking credits, the operation of the 45-day holding rule and the specific anti-avoidance rules relevant to these types of transactions.</p> <p>The session will also outline common issues that arise in practice and provide practical guidance to help advisers navigate capital management decisions with confidence.</p>	<p><b>Session 13C: Payroll Tax</b>            Speaker: Matthew Cridland, CTA, K&amp;L Gates</p> <p>A focused update on the key regulatory developments and practical issues emerging in NSW payroll tax will be delivered. The session will highlight recent changes and areas of heightened interest for Revenue NSW, with particular emphasis on the employment agency and contractor provisions (and how they are being applied in practice).</p> <p>It will also include industry case studies on (a) the building and construction sector; and (b) the gig economy and medical centres, outlining the common pitfalls and compliance challenges businesses are currently facing. It will also discuss important recent cases, including the <i>Uber</i> case that has been appealed to the High Court.</p>

# Technical program

**Day 2** Friday, 22 May 2026 continued

Time	SME stream	Corporate stream	Hot Topics stream
4:30 – 5:30pm	<p><b>Session 14A: Family Law in Property Settlements</b> Speakers: Geoff Stein, CTA, Brown Wright Stein Lawyers, Monique Robb, Landers &amp; Rogers</p> <p>Family law and tax concepts often intersect when working through property settlements arising from relationship breakdowns. This session will explore the key considerations for advisers, including:</p> <ul style="list-style-type: none"><li>• Family law concepts such as the division of assets, spousal maintenance and child support</li><li>• What can be achieved via a well drafted property settlement deed that may not be possible through a court outcome</li><li>• The impact on assets held in family trusts and corporate groups</li><li>• The potential tax implications, including CGT, Division 7A, superannuation splits and duty.</li></ul>	<p><b>Session 14B: General Case Update</b> Speaker: Thomas Arnold, CTA, Ground Floor Wentworth Chambers</p> <p>This session will provide an overview of recent corporate tax cases and the developments shaping the current landscape. It will highlight key decisions affecting large businesses and inbound groups, outline the practical implications for corporate tax teams, and draw out the themes emerging from recent judicial reasoning. The focus will be on what these outcomes mean for compliance, governance and planning within a corporate tax function.</p>	<p><b>Session 14C: Grouping Rules Across Income Tax, GST and State Taxes</b> Speaker: Michael Bennett, CTA, 13 Wentworth Selbourne Chambers</p> <p>This session will compare and contrast the grouping rules across income tax, GST and state taxes, highlighting where the regimes overlap and where they diverge. The discussion will cover formal grouping models such as tax consolidation, GST grouping and payroll tax grouping, as well as less obvious aggregation rules, including land tax grouping, duties grouping, contractor provisions under payroll tax legislation and income tax aggregation rules such as base rate entity and R&amp;D tax offset thresholds.</p>



# Presenters

**Julie Abdalla, FTI**, is the Head of Tax & Legal at The Tax Institute. Julie has practised 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 Institute in several external forums, including the ATO's National Tax Liaison Group, the Australian Treasury's Tax Treaty Advisory Panel and the Tax Practitioners Board's Consultation and Standards Forum. 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.

**Arda Ahmed, ATI**, is the Principal of Norton & Quay Tax Law, a specialist taxation law practice based in Sydney. Arda has over a decade of experience advising high net worth individuals, family groups, not-for-profit organisations and corporate groups on complex tax matters across leading firms, including KPMG, Mills Oakley and EY. His practice encompasses the full spectrum of tax advisory, dispute resolution and transactional support across federal and state taxes, including income tax, CGT, GST, payroll tax, land tax and stamp duty. Arda's disputes and controversy work includes ATO audits and reviews (including Top 100 and Next 5,000 private group programs), voluntary disclosures, private ruling applications, objections, settlement negotiations, penalty and interest remission strategies, and litigation support. He also advises on the tax aspects of transactions and restructures, including private M&A, due diligence, cross-border matters,

and complex regimes such as TOFA and thin capitalisation. Arda regularly assists clients and their advisers with trust and private group issues, including Division 7A, section 100A, Part IVA and small business CGT concessions. Arda holds an LLB (Hons) from the University of Manchester, an LLM from University College London and a Master of Taxation from the University of New South Wales. Arda has presented at the NSW Tax Forum, has been published on the cover of Tax Specialist journal, and is a contributor to Accountants Daily.

**Thomas Arnold, CTA**, is a commercial barrister at Ground Floor Wentworth Chambers who specialises in tax law. He is retained by taxpayers, professional advisers, the Commissioner of Taxation and the Tax Practitioners Board. He is recognised in the Doyle's guide as a recommended tax junior counsel.

**Sam Ayoubi** is the Principal of AHS Legal Services, a boutique law firm providing tax and legal services to accountants, lawyers, private groups and property enterprises. Prior to AHS Legal, Sam worked as a Chartered Accountant and lawyer in accounting and law firms, ranging from small and second-tier firms to Big 4 consulting firms. Sam has also delivered tax education to accountants,

lawyers and government bodies across Australia.

**Adrian Bailey, CTA**, joined Cleary Hoare in 2007 and became a Principal on 1 July 2011. Adrian's strong investigative background allows him to quickly identify the core issues and objectives for clients and efficiently provide solutions. His experience in dealing with people from all walks of life allows him to easily relate to all manner of clients. During his time at Cleary Hoare, Adrian has refined his knowledge and experience in taxation law, estate planning, succession planning, structuring and commercial law. Adrian has also completed his Master of Taxation and is a Chartered Tax Adviser with The Tax Institute.

**Peter Bardos, CTA**, is a Partner in HLB Mann Judd's Private Tax team. He is regarded for his ability to advise on complex tax matters, combining his technical knowledge with a practical understanding of commercial and industry-specific considerations. Peter has experience working across private and corporate clients, including business transactions, restructures, succession planning and private equity structures. Peter has assisted taxpayers through disputes including tribunal and federal court listings.

# Presenters

**David Barrett, CTA**, is Director, PAX Services. He has more than 30 years experience in the financial services industry, including more than 25 years at Macquarie Bank, and has held positions elsewhere in technical services, financial planning and insurance. David's expertise lies in advice law, superannuation and related tax legislation, personal international taxation and retirement income systems. With a passion for clear and simple explanations of complex technical issues, David has presented for more than two decades for Macquarie, CPA Australia, the SMSF Association, FINSIA and The Tax Institute.

**Michael Bennett, CTA**, is a barrister practising from 13 Wentworth Chambers in Sydney. He practises in the following areas: tax planning (including superannuation, estate planning and structuring), federal and state tax litigation, general equity and commercial litigation, bankruptcy and insolvency litigation. Before coming to the Bar, Michael was a solicitor in two boutique SME tax and commercial practices. He was previously a judge's associate. Michael has lectured in tax law and is a Chartered Tax Adviser.

**Jake Berger, ATI**, is a Partner within the Pitcher Partners Private Business and

Family Advisory team. Jake specialises in the provision of tax advisory services to his clients and other clients of the group on a wide variety of matters. Jake is a Chartered Accountant with a Master of Taxation from the University of Sydney.

**Cameron Blackwood, ATI**, is the Head of Tax at Corrs Chambers Westgarth and is a leading transactional tax expert, specialising in mergers, acquisitions and restructures. Having advised several of Australia's largest taxpayers, Cameron's expertise includes cross-border issues and all aspects of employee share schemes. He has significant experience acting for public and private companies on capital management, including capital raising, return of capital, special dividends and buybacks and debt raisings. He regularly presents at The Tax Institute and the Corporate Tax Association on M&A, management incentive plans and international tax issues and demergers. Cameron has been recognised as a leading lawyer by legal directories and publications, including Chambers, The Legal 500 Asia Pacific and Best Lawyers for Tax in Australia.

**Julia Bolodurina** is a Senior Associate at Corrs Chambers Westgarth based in Sydney. Julia has broad experience

of advising clients on a variety of income tax matters, with an emphasis on outbound and inbound investment, mergers and acquisitions, corporate restructures and other areas of corporate and international tax. Julia has advised on a number of transactions involving large listed clients and multinational groups.

**Steven Che** is a Senior Manager in EY's Corporate Tax team based in Sydney. With more than 13 years at EY, Steven has advised a broad range of inbound and outbound multinational corporations, listed entities and SMEs across diverse industries. Steven brings deep expertise in Australian income tax and has a strong focus on tax transformation initiatives and automation. During a secondment with EY UK, Steven contributed to the development of BEPS Pillar Two solutions. Collaborating closely with teams across the practice, Steven is committed to delivering practical, comprehensive solutions tailored to client needs.

**Andrew Clements, FTI**, is a Senior Consultant in the Tax group at King & Wood Mallesons with over 35 years' experience. He has deep expertise in capital gains tax, consolidation, imputation and international tax work. Andrew's practice concentrates on

corporate tax, together with the tax consequences of dealing in intellectual property rights and with the taxation treatment of the funds management industry. He also has extensive experience in relation to both the tax and legal issues associated with employee share schemes and executive remuneration. Andrew is a member of the National Tax Leadership for Mallesons' Generative-AI programs. In addition to using a broad range of Generative-AI tools in practice, he has directly supported the firm's Innovation and executive leadership team with piloting new Gen-AI products and ensuring effective implementation across the Tax group.

**Peter Cohilj, FTI**, is a Chartered Accountant with over 25 years of experience in providing accounting and tax advisory services to a variety of clients. As a Partner with Kelly+Partner's Tax Consulting, Peter's depth of knowledge and experience also allows him to assist with complex commercial disputes through the preparation of expert witness reports, and giving evidence in court under cross-examination. Peter's areas of specialisation include corporate taxation, trusts, capital gains tax, M&A and employment taxes.

# Presenters

**Graeme Colley** is a well-known figure in the SMSF community with a long-standing reputation as an accomplished educator, technical expert and advocate for the sector. He is currently an ambassador for the Auditors Institute and Executive Education Facilitator with the AGSM at the University of NSW. He brings over 30 years of taxation and superannuation experience gained from a wide range of senior positions in the public and private sectors. Graeme contributes to many industry publications and is a joint author of the *CCH Master Financial Planning Guide* and *Financial Planning in Australia*. In addition to his work with the UNSW, his academic teaching experience extends to the Master of Commerce (Financial Planning) at the University of Western Sydney. Graeme is a qualified SMSF Specialist Advisor (SSA) and a Member of Chartered Accountants Australia & New Zealand (CAANZ).

**Bruce Collins, CTA**, is the founder and principal solicitor at Tax Controversy Partners Pty Limited, currently helping clients to resolve all types of tax issues with the ATO and SROs, and for tax agents dealing with the TPB. Before moving into private practice in 2017, Bruce worked for over 35 years in the

ATO, a third of this time as a Senior Executive in what is now the Compliance & Engagement Group, covering most ATO functions. Bruce led, coached and mentored many of the ATO's senior technical and compliance leaders in his role as a Senior Executive, in managing ethical requirements and helping other leaders and staff to develop their abilities to do so. Bruce was also involved in the project setting up the TPB, and in training its first tranche of civil investigators. Bruce has an Accounting Certificate (1989), a first-class honours Degree in Law (1995), a Graduate Diploma in Legal Practice (1996), a Master of Taxation (2003) and a Master of International Taxation (2006). Bruce is a Chartered Tax Adviser, a member of the Law Society of NSW and their Revenue Law Committee, a member of the Australian Institute of Company Directors, and a member of the Law Council of Australia, its Tax Committee and is current Chair of their SME Committee.

**Danielle Constantine** is a Partner in the specialist Tax Services team at William Buck. Danielle provides practical and technical solutions to a variety of clients and other practitioners, specialising in the mid-market. Her experience ranges from capital gains tax, trusts,

acquisitions and restructuring, and small business CGT concessions through to tax consolidation and managing ATO reviews or audits. Danielle regularly presents tax updates and training to both internal and external stakeholders.

**Matthew Cridland, CTA**, is a Partner in the Tax Team at K&L Gates and based in Sydney. He focuses on matters relating to GST and all state taxes. Matthew has been in practice for more than 25 years and he advises clients across a broad range of industry sectors. In addition to assisting clients with deals advice and revenue office reviews, he also has experience advising on litigation matters. Matthew is involved with the indirect tax committees of industry groups, including the Property Council of Australia and the Financial Services Council. He is also a contributor to the *Australian Financial Review* and *The Australian*. He is a Chartered Tax Adviser.

**Craig Day** is the Head of Technical Services for Colonial First State and has over 25 years experience in the financial services industry. In his role, Craig is responsible for providing specialist technical support to financial advisers. Craig holds a Master of Taxation (Financial Planning) and

is a Fellow Member of the SMSF Association.

**Hongjian Fan** is a Data Science Director in Smarter Data at the Australian Taxation Office. He specialises in designing and delivering responsible, high-impact artificial intelligence solutions that drive measurable value for the organisation. Hongjian holds a PhD in Computer Science from the University of Melbourne.

**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.

# Presenters

**Catherine Feng** is an accomplished Head of Tax with more than 17 years experience across corporate tax, M&A and tax dispute resolution. She currently leads the tax functions at Origin Energy and Australia Pacific LNG, overseeing tax governance, advisory and compliance for two Top 100 taxpayers operating in a highly complex and evolving environment. Drawing on experience across ASX-listed companies, large private groups and a top-tier law firm, Catherine brings a practical perspective on emerging tax policy, technology and risk management, and helps position the tax function as a trusted strategic partner within the business.

**Peter Feros, CTA**, specialises in providing front-end strategic income tax advice to significant Australian and foreign corporates and domestic and foreign funds. As one of the leading M&A tax lawyers in Australia, he has broad industry expertise, including the extractive industries, telecommunications, technology and financial services sectors as well as having a broad base of private equity, hedge fund and property fund clients. Peter is recognised for his tax expertise in leading directories and guides, including Chambers Asia-Pacific, was a finalist in The Tax Institute's 2020 Tax

Adviser of the Year awards (Chartered Tax Adviser Category) and was also a finalist in the 2020 Tax Partner of the Year Category (which was run by Lawyers Weekly).

**Tony Frost** of Frost Leadership Consulting in his first, 34-year career was one of Australia's leading corporate tax advisers. He was, and still is, a lawyer and a Chartered Accountant. His clients included BHP Billiton, Macquarie Bank, Westpac Banking Corporation and the Commonwealth Bank of Australia. Before joining Greenwoods in 2003, he had been a tax partner at PwC for seven years. Prior to that, Tony spent five years working in-house at Westpac Banking Corporation. Throughout his tax career, Tony was a regular speaker at The Tax Institute events. He finished his tax career in 2018, after being Managing Partner for seven years at tax advisory firm Greenwoods & Herbert Smith Freehills, one of Australia's most lauded professional services firms. Since 2019, and after completing a Master of Science in Coaching Psychology degree at the University of Sydney, Tony has had a second career as an executive coach, mentor, leadership consultant, facilitator and trainer. He holds a number of non-executive company directorships and is the non-executive Chairman of the Leadenhall Valuation Services group. Tony is a graduate of the Australian Institute of

Company Directors and now teaches in the AICD's prestigious Company Directors course. Tony is also the author of *The Professional: A Playbook to Unleash Your Potential and Futureproof Your Success*. Tony has been a proud member of The Tax Institute for about 40 years.

**Ned Galloway** is an Associate Director in the Tax Advisory team at SW Accountants & Advisors. Ned has specialised in providing tax consulting services to private clients for the past decade, working with some of Australia's largest family offices. He regularly advises clients on M&A transactions, CGT rollovers and restructuring, small business CGT concessions and cross-border taxation issues.

**Shiva Ganapuram** is a data governance leader with over 20 years of experience in data analysis, data engineering and specialises in building the foundations required for trustworthy AI. At the intersection of policy, technology and ethics, he helps organisations translate mature data governance practices, including robust data catalogue capabilities, into practical AI governance frameworks. His work enables safe, transparent and scalable AI adoption by ensuring data is well defined, discoverable, accessible and fully trusted throughout the AI lifecycle.

**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.

**Donal Griffin** is admitted as a lawyer in New South Wales and Ireland and has 30 years experience. Donal has a masters degree in Wills and Estates. Helping families with business interests is his passion and he goes further than most lawyers by assisting families actually do the transitions, which is easier said than done. One tool he offers is a "pre-nup for siblings" as adult children struggle to share an inherited discretionary trust or estate. He is a lifelong learner and is mentored by Jay Hughes. He has written down some of this wisdom in his second book *Be A Better Ancestor – Build one of the great families*. He is a better lawyer because he is a family adviser and businessman and he is a better family adviser and businessman because he is a lawyer. He also has a certificate in family systems theory and

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application from the Family Systems Institute (over 160 hours of course work which suggests to him that he should have received more than a lowly certificate). This helps him understand the clients in the context of their family. He is teaching his practical approach to other professionals who ‘get it’ and want to do more of this work. This course is called “Be A Better Adviser”. Donal describes himself as a ‘Macquarie Street GP’ but really thinks he is the Consigliere in the Godfather, Tom Hagen’s character. He drafts wills, pre-nups, trusts and is the first point of contact for family members with legal issues, even criminal issues. The best question he gets asked is, “What do other people like me do?” The firm is a repository for the answers to this question.

**Mark Hadassin, CTA**, is a partner in the Deloitte International Tax Group in Australia specialising in international tax and infrastructure investment. Mark has over 20 years experience providing advice to major Australian and foreign corporates on domestic and international tax issues. Prior to joining Deloitte in January 2010, Mark spent 2 ½ years as Global Head of Tax at the Babcock & Brown group where he had responsibility for all the group’s tax matters.

**Jane Harris, CTA**, is a Senior Associate at Brown Wright Stein Lawyers with over 15 years of experience assisting high net wealth and SME clients with taxation matters. With a background in accounting and business services, Jane provides tax and commercial advice to accountants, small-to-medium enterprises and private clients. Jane was awarded The Tax Institute’s NSW Tax Trailblazer Award for 2025. Jane is an admitted Solicitor of the Supreme Court of NSW and holds Bachelor of Commerce, Bachelor of Arts, Juris Doctor and Master of Law degrees from the University of Sydney.

**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.

**Charm Jayatileka** is a lawyer specialising in taxation law. She holds an LLB from England, an MBA in Finance, and was

awarded the Dean’s Medal for her LLM in 2025. Charm is a Senior Consultant and lawyer at Kelly+Partners Tax Consulting. Drawing on her background in corporate law, combined with her taxation expertise, Charm advises private clients, including large corporations, family groups and high net worth individuals from diverse industries. Her areas of expertise include corporate taxation and structures, cross-border transactions and capital gains tax. Charm is a member of the NSW Law Society Revenue Law Committee and the Young IFA Network Committee.

**Elizabeth Jools** is a Client Director in Pitcher Partners Tax Advisory division with over 15 years of experience. Her experience includes the provision of tax compliance services to large tax consolidated groups, standalone companies and trusts, as well as partnerships. Elizabeth also has expertise assisting audit teams with tax provision reviews and the provision of a range of income tax advice, including restructures, tax due diligence, consolidation, losses, thin capitalisation, permanent establishments, hybrid mismatch, controlled foreign companies and withholding tax. Elizabeth currently leads the international tax practice in Sydney which specialises in providing

tax compliance and advisory services to global businesses.

**Alexander King** is a Partner at HLB Mann Judd Sydney, where for 18 years he has focused on corporate and funds taxation, advising listed and unlisted corporate and funds clients and large private SMEs. He is closely engaged in the property industry, including as a board member and treasurer of the Property Funds Association of Australia. Alexander has also worked in the United States as part of an HLB secondment and speaks regularly at HLB client events.

**Spyros Kotsopoulos, CTA**, is a Tax Advisory Partner at Deloitte in Sydney with over 25 years experience. Spyros advises clients ranging from high-wealth family groups, large corporate groups and private equity, and is mindful of the specific needs of the commercial interests of each of these stakeholders when providing tax advice. The emphasis of Spyros’ advisory work is on tax structuring, M&A transaction services (including pre-IPO restructures, tax due diligence and review of tax indemnities and warranties), strategic tax planning and tax controversy/audit. Spyros has advised clients involved in financial services, funds management, property and construction, and professional services.

# Presenters

**Ermelinda Kovacs** of Ground Floor Wentworth Chambers is a specialist in tax law and carries with her over 20 years experience. She is recognised in Doyle's Guide as a leading tax barrister. Before coming to the Bar, Ermelinda practised as a solicitor and held the position of Director at EY in the Tax Controversy practice. She is frequently retained by the Commissioner of Taxation, the Chief Commissioner of State Revenue and a range of corporate and private clients in connection with federal and state tax matters. She provides advice during the conduct of tax audits and has been briefed in a large range of tax cases, from complex Part IVA cases to disputes concerning CGT, international tax, GST, the consolidation regime, payroll tax, transfer duty and land tax.

**Peter Kramer, ATI**, advises clients on a range of matters relating to taxation (with a focus on tax disputes), estate planning, superannuation, trusts, asset protection and the law of charities. He takes the time to understand his client's circumstances and objectives and provides clear and pragmatic advice. He helps his clients and their professional advisers to resolve taxation issues with the Australian Taxation Office and Revenue NSW. He is experienced in bringing taxation audits and investigations to a commercial resolution and has prepared successful

objections to many unfavorable taxation assessments and decisions. Peter presents to a number of tax discussion groups. He is committed to continuous learning and development as the law (particularly in the areas of taxation and superannuation) is constantly changing.

**Lirize Loots, ATI**, is a Partner in Pitcher Partners' Tax Advisory division with over 20 years of professional services experience. She specialises in transfer pricing, where she works closely and collaboratively with the client teams across various areas of the business, to help taxpayers proactively manage transfer pricing risk and reporting obligations. Lirize joined Pitcher Partners as a Client Director in October 2021 and is proud to be a part of a growing and dynamic team at Pitcher Partners. Lirize has worked in the UK, South Africa and Australia and across a wide range of sectors and business models. Lirize has also worked in industry as a secondee and consultant, both in terms of leading bespoke transfer pricing projects, setting the strategy for transformation projects and as part of cross-functional project management teams. This allows her to be able to understand the stakeholders impacted and their responsibilities, the business challenges and therefore better navigate transfer pricing needs to be managed within larger, more

complex environments. Her experience includes engaging with the ATO across a range of areas, including country-by-country (CbC) reporting, advanced pricing arrangements, audits and top 100 and 1000 reviews. Lirize has helped clients review the risk outcomes of their international related party dealings against the ATO frameworks (e.g. practical compliance guidelines) and assess their transfer pricing positions. She has significant experience in CbC reporting and aims to provide efficient and friendly compliance solutions. Lirize brings a breadth of transfer pricing experience to the table, including bespoke economic analysis, benefit analysis and documentation, ABC and marginal costing models, intercompany financing and financial services experience, reviewing the implementation of policies across systems and processes, designing transfer pricing policies to address business change, decades of economic analysis, benchmarking and business modelling to support commercially aligned outcomes. Lirize is passionate about helping clients and working collaboratively and believes this includes being responsive, pragmatic and easy to work with.

**Clement Lui** is a Director in PwC's International Tax team with over 14 years of experience advising clients on complex international tax and

transfer pricing issues. He has worked closely with some of Australia's largest multinational groups, providing expertise on cross-border transactions, acquisition structuring and funding arrangements. Clement has also supported a diverse range of clients through advance pricing arrangement negotiations and tax authority reviews, helping them achieve favourable outcomes. In addition, Clement is a key member of PwC's thin capitalisation technical panel.

**Alia Lum, CTA**, is a tax partner at KPMG with more than 25 years of experience in corporate tax, specialising in financial services, international tax and tax transformation. She is KPMG's ASPAC Tax Policy and Regulatory Lead. Alia has previously undertaken secondments to London and Singapore and had close to two years seconded to the Australian Federal Treasury Revenue Group and the Board of Tax Secretariat.

**Collette McFawn** is a Partner of Lander & Rogers, and the National Practice Group Leader of Lander & Rogers' Family & Relationship Law group. Collette has worked solely in the family law jurisdiction for more than 20 years, attaining specialist accreditation from the Law Society of NSW in 2011. She is consistently recognised by the profession as one of Australia's leading family and divorce

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lawyers. Prior to moving into private practice, Collette served for more than three years as an Associate to a Judge presiding over family law matters. Before entering legal practice, Collette held an executive position in audit and loss prevention at a publicly listed corporation. Collette brings the breadth and depth of both her commercial and jurisdictional experience to every matter in which she and her firm are involved. More recently, Collette attained qualifications in Collaborative Practice and is now a member of the Australia Association of Collaborative Professionals. That work has presented additional opportunities to collaborate with other professionals (including accountants and tax advisers) in advising families on a range of complex financial settlements.

**Matthew McKee, FTI**, is a Partner of the Sydney law firm Brown Wright Stein Lawyers. Matthew assists accountants and lawyers in advising their clients on all aspects of tax and superannuation for SMEs and high net wealth individuals and family groups.

**Miryam Meza, CTA**, is a senior tax executive with extensive experience across large, complex global organisations. As Head of Tax at CIMIC Group Limited, Miryam provides strategic leadership and oversight of the Group's

tax function, with a strong focus on governance, compliance and risk management in an increasingly complex and evolving environment, guiding the organisation through structural and regulatory change while building high-performing, resilient tax teams. She brings deep expertise in corporate and international tax matters and is a trusted advisor to the Board and executive management on the implications of emerging regulatory developments, increased transparency requirements and cross-border tax reform.

**Andy Milidoni, CTA**, of Mills Oakley, specialises in all aspects of taxation, revenue law and trust law and some aspects of superannuation law. He advises both public and private corporate groups, SMEs and high wealth individuals across industry sectors and in a range of income tax, international tax, GST, duty, payroll tax, land tax and SGC matters, and in both a contentious and non-contentious context. Andy also works closely with a range of intermediaries, such as accountants, business and corporate advisers, liquidators, financial planners and court-appointed trustees and guardians.

**Fiona Moore, CTA**, is EY's Oceania Tax Policy & Controversy leader and has a wealth of experience in advising clients

in relation to the tax audit life cycle and dispute resolution. With over 25 years experience, Fiona is well versed in taxpayer rights and responsibilities, and has been involved in a number of tax disputes requiring the management of large amounts of information and data. Fiona has a background in corporate tax compliance and an understanding of tax functions that provides her with a sound foundation for working with clients to develop bespoke tax corporate governance frameworks to manage risk.

**James Nickless** has been a Partner with PwC since 2014, specialising in international tax and transfer pricing. He has advised on a wide variety of cross-border transactions, mergers and acquisitions, and tax controversy matters. His unique skillset allows him to advise on cross-border transactions holistically, combining international tax and transfer pricing skills. James chairs PwC's thin capitalisation technical panel.

**Richard Nutt** is a Partner in Global Trade. He assists clients on all global trade-related matters and has over 20 years experience working with global firms to understand clients' goals so that he can add value by shifting seamlessly between high-level strategic advice to implementing the detailed technical advice.

**Peter Oliver, CTA**, is the National Leader, International Tax at KPMG. Peter advises on cross-border transactions, international M&A, restructuring and other corporate matters. Peter formerly led the Australian Tax Centre at KPMG US from 2019 to 2022 where he also led the Australia-US corridor. Peter advises major ASX-listed, private and institutional clients across a range of international tax issues, including the treatment of intangibles, hybrid mismatches, financing, corporate structuring and related matters.

**Denise Parker** is a Corporate Tax Partner at EY Australia with over 22 years experience across the United Kingdom and Australia. She specialises in providing corporate income tax compliance and advisory services for Australian listed companies and large multinationals, with a particular focus on the Consumer, and Media & Entertainment sectors. As the EY Oceania Tax 'Data, Knowledge, Technology and AI' Leader, Denise shapes and drives the digital and AI-enabled transformation agenda. She leads the strategic integration of technology and AI across EY Oceania Tax, uplifting capability, modernising delivery and enabling more efficient, insights-led and innovative client outcomes.

# Presenters

**Karina Ralston** is a Principal/Director and Accredited Specialist within Coleman Greig's Family Law team. Karina is an Accredited Family Law Mediator and Arbitrator. She has extensive experience advising clients on binding financial agreements and complex high net wealth property matters (for both matrimonial and de facto relationships), and particularly those that involve a family business, various trust arrangements or have tax considerations. She considers all possible contingencies based on the unique circumstances of each of her clients, which has helped her to develop her forward-thinking approach. She provides advice, negotiates and litigates beyond the obvious issues that arise in family law matters. She is particularly conscious to ensure that all relevant tax liabilities are considered and factored into the structuring of any settlement. Karina advocates asset protection and risk management, enjoying opportunities to prepare tax-effective binding financial agreements in significant and complex property matters. She is of the view that clients' family law matters are often inseparable from their tax planning. She has completed her Master of Law (Family Law) and is currently completing her Master of Law (Taxation Law). She is on the Law Society of New South Wales Specialist Accreditation Committee.

**Monique Robb** is a partner in Lander & Rogers' family & relationship law team, based in Sydney. She holds an accredited specialisation in family law and a Master of Laws specialising in family law and laws impacting families and children. Monique is recognised by the profession for her technical expertise, particularly in matters involving complex parenting and property issues. Monique also has significant expertise in asset protection, often acting to advise high net worth clients and family offices in respect of binding financial agreements and other options available to them.

**Rebecca Saint** is Deputy Commissioner Litigation and Legal Services. Rebecca is responsible for the ATO's Part IVC and debt litigation programs. Before her current role, Rebecca was Deputy Commissioner for Public Groups, where she had a leading role in the Tax Avoidance Taskforce.

**Andrew Sharp** is a Managing Director in the Alvarez & Marsal Tax team, focused on M&A, as well as fund establishment and design. Andrew has more than 20 years experience advising domestic and international fund managers on the raising of funds, as well as assisting foreign and domestic investors on the tax implications of transacting in Australia.

**Louisa Sijabat** of Merchants Advisory has been helping people navigating financial stress and distress for over 17 years. She is a small business restructuring practitioner, registered liquidator, registered trustee in bankruptcy and a Chartered Accountant.

**Bryan Soepardi, ATI**, of RSM Australia, is one of the APAC region's leading R&D Tax practitioners, particularly across emerging technologies and large manufacturing and engineering projects. His career has entailed contributing to policy development, leading change management initiatives for multinational corporations and presenting at technical conferences on international R&D tax incentive programs. From the recent *R&D Tax Transparency Report* relating to the 2022 R&D tax claims in Australia, Bryan is the lead adviser to three out of the top 10 R&D tax claimants in Australia. His passion for understanding the design behind technologies and processes, combined with expertise in tax and statutory interpretation, enables him to deliver tailored solutions to each client.

**Andrew Sommer, CTA**, of King & Wood Mallesons, is an expert in indirect taxation, with a particular specialty in complex GST issues. He is called upon to advise on all aspects of the GST for

any major projects or transactions. He advises clients on financial structuring (including securitisation), property dealings and commercial transactions. Andrew has extensive experience in conducting and managing disputes with revenue authorities. Although Andrew's practice is primarily focused on GST, he has also worked in a range of other taxation areas, including income tax, payroll tax, fringe benefits tax and R&D tax incentives. Andrew has more than 30 years experience in indirect tax, having started in the Sales Tax group of Ernst & Young and having spent almost three decades in the Tax group at Clayton Utz. Andrew has taught postgraduate courses in taxation for both the University of New South Wales and Sydney University and served for 12 years on the ATO's Public Advice and Guidance Panel.

**Geoff Stein, CTA**, is a Partner of Brown Wright Stein Lawyers. Geoff is one of only a few New South Wales Law Society Accredited Specialists in taxation law and his practice extends to commercial matters and estate planning. Geoff is a Director of Giant Steps, an organisation dedicated to helping create a bright future for children with autism and their families and a life member of the Stroke Recovery Association.

# Presenters

**Gamil Tadros** has over eight years of experience in transfer pricing at EY, advising inbound and outbound multinationals across various industries. He specialises in Australian country-by-country reporting, and works with clients on operating model design and the implementation of transfer pricing policies aligned with global compliance frameworks.

**Jayde Thompson** is a Managing Director with Alvarez & Marsal Tax in Melbourne. She has 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.

**Lisa To, CTA**, heads the Private Clients group at Bartier Perry Lawyers, comprised of taxation, estate planning, business succession, superannuation, contested and uncontested estate administration, probate & litigation, and family law teams. She is a Chartered Tax Adviser (CTA), Trust and Estate Practitioner (TEP) and Accredited Self-Managed Superannuation Fund Specialist Advisor (SSA). Lisa has over two decades of experience in

Australian federal and state taxation, trust laws, cross-border estate planning and taxation disputes. She was awarded the highest mark in the STEP Advanced Certificate in Cross-Border Estates. Lisa provides legal counsel to other professional advisers, individuals and private groups at all stages of life, from wealth structuring to intergenerational succession planning. Lisa was the winner of the Lawyers Weekly Australian Taxation Partner of the Year Award in 2024 and 2022. Year on year, she has been listed in Doyle's Guide in the categories of both Leading Tax Lawyers and Estates & Succession (NSW).

**Peter Walmsley** took an oath of secrecy under former s.16 of the Income Tax Assessment Act 1936 (Cth) (ITAA 1936) in April 1977 and, beginning as he meant to continue, commenced work in the ATO cancelling incorrect tax assessments. A year or two later, he began work as an assessor disallowing claims of \$7 for home office expenses. By the early 1980s, he was working in Appeals happily defending the disallowance of claims of \$7 for home office expenses before Board of Review No 1. By the late 1980s, the claims had acquired eight or nine zeros and he was involved for the first, but by no

means the last, time in futile proposals for reform of entity taxation. By the early 1990s, he was working in the then legislative services group in Strategic Research and Analysis, which led to work on various proposals, some of which were enacted (for example the family trust distribution tax, the 45-day holding period rule for franking, the capital tainting rules, s.45B, and s.177EA in the ITAA 1936). By the mid-1990s, he was a member of the Tax Counsel Network, and by around the beginning of this century, Deputy Chief Tax Counsel. He has been a member or chair of the Part IVA Panel (subsequently renamed the GAAR Panel) on and off since 2003. He was responsible, among other cases, for the ATO's conduct of the Hart case and the Pepsi case in the High Court.

**Prof Michael Walpole, CTA**, is a Professor of Taxation Law in the School of Accounting, Auditing and Taxation (including Atax) at UNSW Business School. Prior to academic life, Michael was variously a Tax Consultant with Ernst & Young, and was in private practice as a legal practitioner. Michael has authored and co-authored several books, including *Proposals for the Reform of the Taxation of Goodwill*, *Understanding Taxation Law*, and *Compliance Cost*

*Control*. Michael has also written and presented many papers on his research topics to practitioner and academic audiences in Australia and overseas. He is the editor of the *Australian Tax Forum* and is an International Research Fellow at the Oxford University Centre for Business Tax in the Said Business School, University of Oxford. He has been a visiting Professor at the OECD's Centre for Tax Policy and Administration and remains involved in its work on GST/VAT.

**Andrew Watson** is Chief Data Officer and Deputy Commissioner Smarter Data Program at the ATO. He has over 30 years of experience in the ATO and in that time has held a number of key leadership positions, including delivery of innovative data solutions, improving outcomes for individual taxpayers, strengthening engagement with tax professionals, supporting small businesses, and leading major technology transformation programs.

# Venue and accommodation



## Sofitel Sydney Wentworth

61 / 101 Phillip Street, Sydney, NSW, 2000

The NSW Tax Forum will be held at the newly renovated **Sofitel Sydney Wentworth**, an iconic Sydney hotel combining French elegance with contemporary comfort. Centrally located and thoughtfully redesigned, the venue provides a premium and professional setting for this flagship event.

### Getting there

Ideally situated in the heart of Sydney's CBD, Sofitel Sydney Wentworth offers exceptional connectivity for delegates. The hotel is located approximately 12 kilometres from Kingsford Smith Airport and is within easy walking distance of major train, ferry and bus services, including the newly opened Martin Place Metro.

Just minutes from iconic Sydney landmarks such as Circular Quay, The Rocks, the Royal Botanic Gardens and the Sydney Opera House, Sofitel Sydney Wentworth provides a convenient and elegant base from which to experience the best of the city.

### Parking

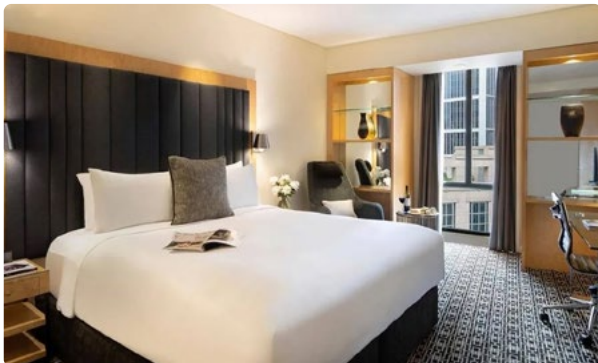
Parking for Sofitel Sydney Wentworth is located off Bligh Street and is operated by Wilson Car Parking, with an entry height of 2.10m. If you are a hotel guest, parking is charged AUD \$67 per vehicle per day. If attending a conference and/or event, parking is charged at AUD \$65 per vehicle per day. To access this special rate, validate your parking ticket and pay at Wilson Car Park upon your departure. For hotel guests, provide your room number. Wilsons Parking also offers a premium valet service; please contact [Wilson Parking](#).

### Accommodation

Sofitel Sydney Wentworth offers 436 contemporary guest rooms, including 45 luxury suites, set across 15 levels surrounding an elevated garden courtyard. Stylish finishes and modern amenities make the hotel an ideal choice for delegates attending the NSW Tax Forum.

Accommodation bookings can be made directly with the hotel via the booking [link](#) or by contacting the hotel directly on (02) 9228 9188.

Please refer to the Sofitel Sydney Wentworth cancellation policy when booking. All hotel charges and incidentals, including breakfast, remain the responsibility of delegates, and individuals will be responsible for payment of the balance of their account when checking out of the hotel. Please note that extra charges may be incurred for additional guests and will be charged to individual room accounts upon checkout.



# Event information

## Confirmation of registration

Please note you will receive two separate emails in the form of a tax invoice at the time of payment and a confirmation email at registration completion.

## Continuing Professional Development (CPD)

Attendance at the conference counts for 14 hours of CPD with The Tax Institute.

## The Tax Institute's attendee hub

This event will be accessible to all delegates via our dedicated attendee hub. Program information, materials (technical papers and presentations), survey forms and more will be available via The Tax Institute's virtual attendee hub. All delegates are encouraged to access the platform prior to the event. Technical papers and PowerPoint presentations will be available on the attendee hub to all participating delegates approximately five days before the event. Delegates will receive instructions on accessing the virtual attendee hub by email.

## Delegate list

A delegate list will be included on the attendee hub to assist with networking. Please indicate at the time of registration if you do not want your name to be included. Alternatively, you can edit your profile visibility settings in the virtual attendee hub at any time during the event.

## Dress code

Business or business casual attire is suitable for the duration of the conference.

## Special dietary and accessibility requirements

Please indicate any special dietary requirements at the time of registration. Please email us with any accessibility requirements at [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au)

## Networking function

A networking function will be held directly following the last session on Thursday from 5:30pm at the Sofitel Sydney Wentworth. The networking function is included

in the conference registration fee for delegates. Additional tickets are available to purchase for accompanying persons at a cost of \$80. Please indicate your requirements, including dietary requirements, at the time of registration.

## Cancellation policy

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

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

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

## Privacy

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

## Enquiries

For further information regarding this event, please contact the Events Team on 1300 829 338 or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

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

# Registration

## Registration inclusions

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

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

## Discounts

### Early bird registration

All registrations received and paid on or before Friday, 24 April will be entitled to an early bird discount.

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

### Group discounts

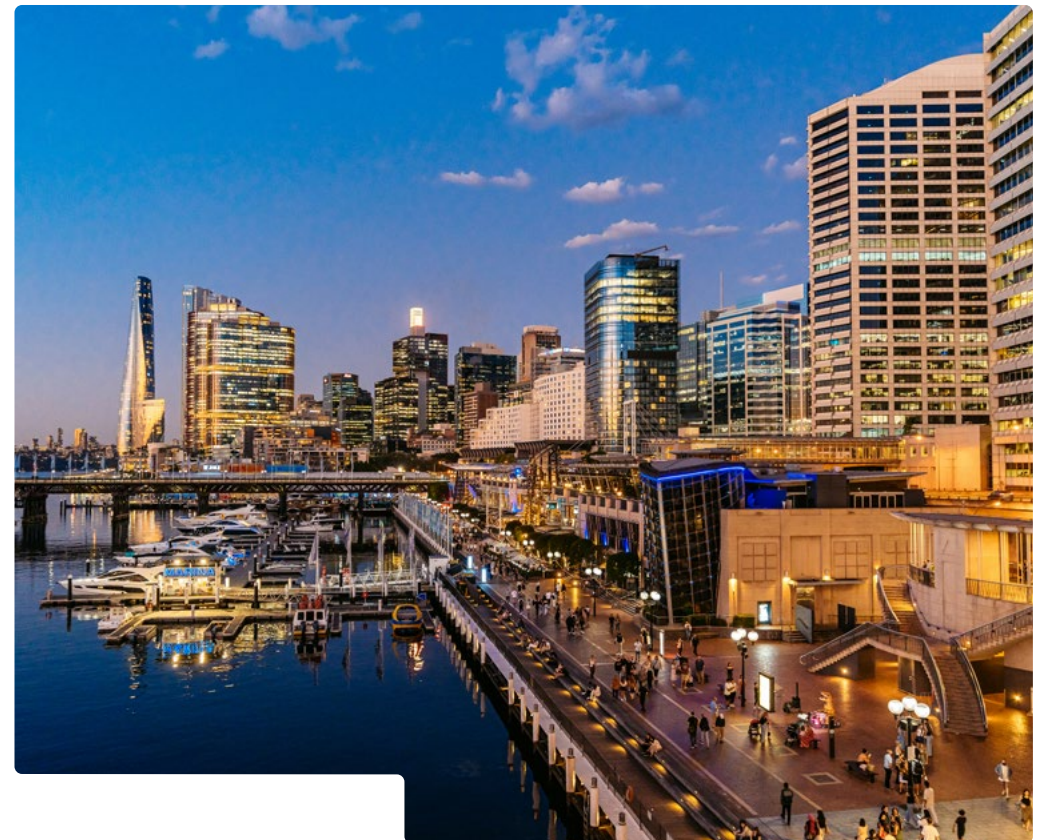
Purchase four full registrations (early bird or standard) and receive a fifth full registration for free. The free fifth registration must be of equal or of less value to the four paid registrations.

This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together. For further information, please contact the National Events Team on 1300 829 338 or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

## Register now!

**Register online** ▶

**Register via form** ▶  
included in this brochure



A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

## 1 Registration

Please see page 29 for registration inclusions.

### Full registration – 14 CPD hours

	Member	New member*	Non-member
<b>Early bird registration</b> Register on or before Friday, 24 April 2026	<input type="checkbox"/> \$1,795	<input type="checkbox"/> \$2,215	<input type="checkbox"/> \$2,095
<b>Standard registration</b> Register after Friday, 24 April 2026	<input type="checkbox"/> \$1,995	<input type="checkbox"/> \$2,415	<input type="checkbox"/> \$2,295

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, 21 May 2026 at the Sofitel Sydney Wentworth

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

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

Dietary requirements:

## 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 TODAY

### 3 Breakout session options

Please advise below which sessions you would like to attend during the forum.

#### DAY 1 – Thursday, 21 May 2026

- |                            |                                     |                                     |                                     |
|----------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Session 1: 8:30–9:30am     | <input type="checkbox"/> Session 1A | <input type="checkbox"/> Session 1B | <input type="checkbox"/> Session 1C |
| Session 2: 9:30–10:30am    | <input type="checkbox"/> Session 2A | <input type="checkbox"/> Session 2B | <input type="checkbox"/> Session 2C |
| Session 3: 11:00am–12:00pm | <input type="checkbox"/> Session 3A | <input type="checkbox"/> Session 3B | <input type="checkbox"/> Session 3C |
| Session 4: 12:00–1:00pm    | <input type="checkbox"/> Session 4A | <input type="checkbox"/> Session 4B | <input type="checkbox"/> Session 4C |
| Session 5: 2:00–3:00pm     | <input type="checkbox"/> Session 5A | <input type="checkbox"/> Session 5B | <input type="checkbox"/> Session 5C |
| Session 6: 3:30–4:30pm     | <input type="checkbox"/> Session 6A | <input type="checkbox"/> Session 6B | <input type="checkbox"/> Session 6C |
| Session 7: 4:30–5:30pm     | <input type="checkbox"/> Session 7A | <input type="checkbox"/> Session 7B | <input type="checkbox"/> Session 7C |

#### DAY 2 – Friday, 22 May 2026

- |                             |                                      |                                      |                                      |
|-----------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Session 8: 8:30–9:30am      | <input type="checkbox"/> Session 8A  | <input type="checkbox"/> Session 8B  | <input type="checkbox"/> Session 8C  |
| Session 9: 9:30–10:30am     | <input type="checkbox"/> Session 9A  | <input type="checkbox"/> Session 9B  | <input type="checkbox"/> Session 9C  |
| Session 10: 11:00am–12:00pm | <input type="checkbox"/> Session 10A | <input type="checkbox"/> Session 10B | <input type="checkbox"/> Session 10C |
| Session 11: 12:00–1:00pm    | <input type="checkbox"/> Session 11A | <input type="checkbox"/> Session 11B | <input type="checkbox"/> Session 11C |
| Session 12: 2:00–3:00pm     | <input type="checkbox"/> Session 12A | <input type="checkbox"/> Session 12B | <input type="checkbox"/> Session 12C |
| Session 13: 3:30–4:30pm     | <input type="checkbox"/> Session 13A | <input type="checkbox"/> Session 13B | <input type="checkbox"/> Session 13C |
| Session 14: 4:30–5:30pm     | <input type="checkbox"/> Session 14A | <input type="checkbox"/> Session 14B | <input type="checkbox"/> Session 14C |

### 4 Payment summary

Registration fees	\$	<input type="text"/>
Additional guest tickets – Networking function (\$80 each)	\$	<input type="text"/>
<b>Total payable</b>	\$	<input type="text"/>

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

### 5 Payment method

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

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

Name on card:

Card no.:  Expiry date:

Cardholder's signature:

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

For event enquiries, please contact the National Events Team on **1300 829 338** or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au)

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

**Collection notice:** The Tax Institute (TTI) complies with its obligations under the *Privacy Act 1988* (Cth) with respect to how it handles personal information. For information on how TTI collects, uses, holds and discloses personal information, please see its Privacy Policy at [www.taxinstitute.com.au](https://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](mailto:customeradmin@taxinstitute.com.au)

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

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

A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

## 1 Employer Ticket types

Employer Tickets offer a flexible option for employers to send multiple attendees to an event. We have different options to suit you and your team.

	Classic	Plus	Premium	Tailored
<b>Early bird</b> on or before Friday 24 April 2026	\$3,450	\$4,950	\$6,450	
<b>Standard</b> after Friday 24 April 2026	\$3,650	\$5,150	\$6,650	
<b>Best for</b>	SME	Mid-Tier	Corporate	Large/National
<b>Flexibility</b>	Your choice of 20 sessions	Your choice of 40 sessions	Your choice of 60 sessions	<a href="#">Contact us</a> to tailor a quote today for you and your team to attend multiple events.
<b>Team attendance</b>	Up to 5 attendees	Up to 10 attendees	Up to 15 attendees	
<b>Session formats</b>	Face-to-face	Face-to-face	Face-to-face	
<b>Networking</b>	5 networking passes	10 networking passes	15 networking passes	

### All Employer Ticket attendees receive:

- Electronic access to download available technical papers and presentations
- Morning tea, lunch and afternoon tea
- CPD hours allocated according to attendee

1 session = 1 CPD hour per attendee

### Session selection

- Coordinators will be contacted with a session selection form to complete on behalf of attendees, based on the Employer Ticket type selected.
- The session selection form must be completed in full to ensure proper allocation of CPD hours post-event.

## 1 Employer Ticket types

Promotional code:

Ticket type	Cost	No. of tickets	Sub-total
<input type="checkbox"/> Classic			
<input type="checkbox"/> Plus			
<input type="checkbox"/> Premium			
<b>Total payable \$</b>			

## 2 Delegate contact details

Member no.:  If your member details are up-to-date, you can skip this section.

Title:  Mr  Mrs  Miss  Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb:  State:  Postcode:

Telephone:  Mobile:

Email:

Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking

## 3 Payment method

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

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

Name on card:

Card no.:  Expiry date:

Cardholder's signature:

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**To register**

Email [customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au)

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

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

Join the conversation

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

