

# The *Tax* Summit

2-4 Sept 2026

ICC Sydney

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# The Tax Summit

# POWERED BY PEOPLE

Digital innovation, major global events and economic, cultural and political shifts are rewiring the world as we know it. But our tax system isn't built by algorithms and bytes – it's built by people.

**The thinkers** championing meaningful change.

**The leaders** navigating complexity.

**The professionals** turning possibility into real-world impact.

Join us at The Tax Summit as we blend technical expertise, human connection and a community built on integrity in all we do into a celebration of what's best about our tax system: **the people who power it.**

## Thought-provoking technical program

The Tax Summit encompasses the wide and varied experiences and constantly shifting environment of tax professionals, and is designed for all those working in the profession. There's always something new to learn, and as we set out to forge the future of tax, the technical program provides the insights, tips and ideas you'll need in your tax toolkit. Tailor your experience during the event to suit your areas of interest with seven specialised streams to choose from.

## See you at the Summit

Some things are just better in person. Connecting and collaborating with colleagues old and new is one of them. Network with practitioners from all corners of the tax profession during the event. Bring the team along via one of our flexible Employer Ticket options or reward them with a great night out among peers at our Gala Dinner celebrating our community.

## Destination Sydney

In the city of Sydney, the future is now. A wide array of major projects are underway in and around the CBD planned to enhance the harbour foreshores and set the scene for a sustainable and innovative future.

Take some time out to explore the sights and scenes of this ever-evolving city and its surrounds or bring your family and extend your stay for a few days over the weekend.



[Register now ▶](#)

# Committee Chairs



**Tim Sandow, CTA**  
Organising Committee Chair  
President, The Tax Institute



**Sandra Farhat, FTI**  
Program Committee Co-Chair  
EY



**Daniel Smedley, CTA**  
Program Committee Co-Chair  
Sladen Legal



**Leo Efthivoulou, CTA**  
Hot Topics Stream Chair  
ENA Law



**Loreena Gillon, CTA**  
SME Stream Chair  
Arithmos Chartered Accountants



**Annemarie Wilmore**  
Corporate Stream Chair  
Johnson Winter Slattery



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For those  
who want to  
be inspired  
by the  
brightest  
minds in tax



## Who should attend?

### Taxation specialists

across all sectors (public, private, NFP)

### Accountants and Lawyers

working for or advising SMEs or corporates

### Business leaders, owners, directors and consultants

with an interest in tax

### Newcomers to the profession

who are wanting to learn and grow their networks

### Anyone with an interest

in the latest issues impacting businesses locally and globally

## Why attend?

**Learn** up to 20 CPD hours on offer

**Discover** hear from the latest thought leaders in tax

**Network** three dedicated functions form part of the Summit

**Relax** take a break and enjoy pre-or post summit tour of Darling Harbour

## ✦ Highlights

70+

speakers

40+

sessions

20








CPD hours

3

days

# Program

## The Tax Summit • Streams









| SME  | Corporate  | Tax Disputes   | Property   | AI  | Next Generation  | Hot Topics  |
|--|--|--|--|---|--|---|
|  <p>Join leading tax experts for in-depth sessions on trusts, estate planning, small business CGT, superannuation and more – tailored for SME advisers, sole practitioners, mid-tier partners, lawyers, barristers, academics and government professionals.</p> |  <p>A cutting-edge tax technical stream delivered by leading advisers legal experts and regulators – diving into key issues like M&amp;A, residency, tax consolidation and private capital. Perfect for mid to large tier firms, lawyers, barristers and heads of tax from ASX 200 companies.</p> |  <p>Navigate the sharp end of tax. Featuring expert insights on managing disputes, litigation strategies and practical tips and traps when conflicts arise. Aimed at sole and SME practitioners, tax controversy specialists, lawyers, barristers and in-house tax teams facing ATO scrutiny.</p> |  <p>This stream is ideal for tax professionals, accountants, lawyers and advisers working with property developers, investors or high-net-worth clients, as well as those looking to deepen their expertise in property-related tax matters and stay ahead of emerging risks and opportunities.</p> |  <p>The AI stream tackles real-world dilemmas facing today's tax professionals – offering practical guidance with a functional analysis of how decisions are being made by AI and the intersection of AI and ethics. A must for advisers in this rapidly changing landscape.</p> |  <p>Designed for rising professionals, this stream delivers practical insights and aspirational guidance to help new entrants build strong foundations for a successful tax career. Perfect for staff up to manager level, as well as early-career industry reps.</p> |  <p>A dynamic tax technical stream for all Summit attendees – exploring emerging issues and challenges shaping the profession. This stream will cover FBT, AML and counter terrorism, and much more!</p> |

# Pre-event & Day 1 • Wed, 2 Sept 2026







## Pre-event

**Session 1:** Announced, Stalled and Shelved – A Practical Guide for Advisers







## Day 1 • Wednesday 2 September

|                 |   |  |  |   |
|-----------------|---|--|--|---|
| From 9:00am     | Registration  |  |  |   |
| 10:00-10:30am   | <b>Session 2:</b> Official Welcome and Opening Address – Tim Sandow, CTA, President, The Tax Institute                        |  |  |   |
| 10:30-11:30am   | <b>Session 3:</b> Justice Hill Memorial Lecture   |  |  |   |
| 11:30am-12:00pm | Morning tea   |  |  |   |
|                 | SME                                        |  | Corporate         |   |
| 12:00-1:00pm    | <b>Session 4.1:</b> Family Trust and Interposed Entity Elections – Where Succession Planning Goes Wrong                       |  | <b>Session 4.4:</b> Australia's Thin Capitalisation Regime – Reform, Risk and Practical Implications |   |
| 1:00-2:00pm     | Lunch   |  |  |   |
|                 | SME    | Tax Disputes  | Next Generation   | Corporate  |
| 2:00-3:00pm     | <b>Session 5.1:</b> Small Business CGT – Current and Emerging Issues  | <b>Session 5.2:</b> Navigating ATO Debt – Current Issues and Strategies                          | <b>Session 5.3:</b> Leading in Tax – From Technical Expert to Trusted Adviser                        | <b>Session 5.4:</b> Data Centres – An International Tax Case Study                            |
| 3:00-3:30pm     | Afternoon tea   |  |  |   |
| 3:30-4:30pm     | <b>Session 6.1:</b> The Future of Trusts: When the Next Generation Walks Away or is Pushed – Trust Exit, Control and Tax Risk | <b>Session 6.2:</b> Evidence in Tax Disputes   | <b>Session 6.3:</b> Financing 101 – Building Your International Tax Toolkit                          | <b>Session 6.4:</b> Tax Consolidation – Ins and Outs  |
|                 | SME                                      |  | Corporate       |   |
| 4:30-5:30pm     | <b>Session 7.1:</b> SME – What's on Our Radar   |  | <b>Session 7.4:</b> Corporates – What's on the ATO's Radar   |   |
| 5:30-7:30pm     | Welcome Reception, Sofitel Darling Harbour, Sydney  |  |  |   |

# Day 2 • Thu, 3 Sept 2026

|                 |   |  |   |   |
|-----------------|---|--|---|---|
| 8:30–9:15am     | <b>Session 8:</b> Tax Reform in Motion – Policy, Politics, and the Real-World Impact                              |  |   |   |
| 9:15–10:00am    | <b>Session 9:</b> Commissioner’s Address – Rob Heferen, Commissioner of Taxation, Australian Taxation Office      |  |   |   |
| 10:00–10:30am   | Morning tea   |  |   |   |
|                 | SME<br>                          | Property<br>  | Hot Topics<br> | Corporate<br>                |
| 10:30–11:30am   | <b>Session 10.1:</b> Issues in Franking for SMEs  | <b>Session 10.2:</b> Current Tax Issues in Property Development                                  | <b>Session 10.3:</b> Part IVA – Implications of Recent Decisions                                  | <b>Session 10.4:</b> M&A Tax – Navigating the Uncertainty   |
| 11:30am–12:30pm | <b>Session 11.1:</b> Structuring Into the Concessions   | <b>Session 11.2:</b> Deductions – Rental Properties and Holiday Homes                            | <b>Session 11.3:</b> FBT Implications for Owners, Controllers and Directors                       | <b>Session 11.4:</b> Treaty Access and Tax Presence – Navigating Residency, Permanent Establishment and the MLI |
| 12:30–2:00pm    | <b>Lunch and Session 12:</b> CGT Reform 2026 – Budget Measures and Announced Law (session commencing at 1:00pm)   |  |   |   |
| 2:00–3:00pm     | <b>Session 13.1:</b> When SMEs Cross Borders – Key International Tax Issues to Watch                              | <b>Session 13.2:</b> Land Tax Nuances Across the States  | <b>Session 13.3:</b> R&D Tax Incentive 2026 – What’s New and What Matters Most                    | <b>Session 13.4:</b> Beyond Compliance – What Corporate Tax Leaders are Focused on Now                          |
| 3:00–3:30pm     | Afternoon tea   |  |   |   |
|                 | SME<br>                        | Corporate<br> |   |   |
| 3:30–4:30pm     | <b>Session 14.1:</b> Beyond the Will – Unravelling Tax in Deceased Estates  |  | <b>Session 14.4:</b> Debt Deduction Creation Rules – Practical Applications                       |   |
| 4:30–5:30pm     | <b>Session 15.1:</b> <i>Bendel</i> – Between the Budget, Subdivision EA and Section 100A, is any Victory Pyrrhic? |  | <b>Session 15.4:</b> Royalties and Intellectual Property – Structuring, Substance and Scrutiny    |   |
| 5:30pm          | Delegate free time  |  |   |   |
| 7:00pm          | Tax Summit Gala Dinner, ICC Sydney, Grand Ballroom  |  |   |   |

# Day 3 • Fri, 4 Sept 2026

|                 |   |   |  |   |
|-----------------|---|---|--|---|
| 8:30–9:30am     | Session 16: VIP Presentation  |   |  |   |
|                 | SME    | AI         | Hot Topics  | Corporate  |
| 9:30–10:30am    | Session 17.1: When Pre-CGT Status is Lost and Opportunities When it is Not              | Session 17.2: Ethics and AI   | Session 17.3: AML and Counter Terrorism – Where Are We Now?                                    | Session 17.4: Private Capital in Focus – Tax Risk, Regulation and Market Direction            |
| 10:30–11:00am   | Morning tea   |   |  |   |
| 11:00am–12:00pm | Session 18.1: SMSF Advisers – Have You Been Paying Attention?                           | Session 18.2: Functional Analysis – How Decisions are Being Made by AI                        | Session 18.3: GST Update – The Year in Review and What Lies Ahead                              | Session 18.4: Australia’s Public CbC Reporting – Compliance and Strategy                      |
|                 | SME  | Corporate  |  |   |
| 12:00–1:00pm    | Session 19.1: Splitting More Than Assets – The Tax Side of Divorce                      |   | Session 19.4: Economic Update  |   |
| 1:00–2:30pm     | Session 20: Closing Keynote and Seated Lunch, ICC Sydney, Cockle Bay Rooms              |   |  |   |



**Session 3:**  
**Recent and emerging developments  
shaping our tax system**

**Panelists:**  
Philip Broderick, CTA, Steden  
Legal, Shaun Carbon, FTI, Arnold Bloch  
Lobler and Premia Roe, CTA, BHP Group Limited

**Facilitator:**  
Julie Aodua, FTI, The Tax Institute

The Tax Institute The Tax Summit



# Technical streams



# Keynotes

## Pre-Event – Session 1: Announced, Stalled and Shelved – A Practical Guide for Advisers

Not everything that's announced makes it into law – and not everything that's shelved stays shelved. This session tracks recent tax measures still awaiting enactment, Board of Taxation recommendations that haven't been acted on, Treasury projects that quietly fell off the agenda, and ATO rulings and determinations that have lingered in draft for years. For advisers, the uncertainty creates real challenges – how do you advise on structures and transactions when the rules may change, may never change, or may be quietly abandoned?

We explore when to plan around proposed changes, when to rely on draft guidance, when to proceed as if nothing will happen, and how to build flexibility into client advice. Essential for advisers who need to know what's live, what's dead, and what might yet resurface.

## Session 2: Opening Address and President's Welcome

**Speaker:** Tim Sandow, CTA, President, The Tax Institute

## Session 3: Justice Hill Lecture

**Speaker:** Michael Clough, FTI, Mallesons

## Session 8: Tax Reform in Motion – Policy, Politics, and the Real-World Impact

This panel will explore how recent budgets, Australian economic and political settings, and global events are shaping the future direction of tax policy. Bringing together industry leaders and practitioners, the discussion will examine key reform debates including intergenerational equity, complexity and productivity, and the relationship between tax reform and living standards.

The panel will also consider how tax reform is perceived by the public versus the practical realities faced by government, advisers and businesses, as well as the role of industry, advisers and individuals in influencing and responding to an evolving tax landscape.

## Session 9: Commissioner's Address

**Speaker:** Rob Heferen, Commissioner of Taxation and Registrar of the Australian Business Register and the Australian Business Registry Services

In this annual address, Commissioner Heferen will discuss the current tax landscape and what's on his radar.

## Session 12: CGT Reform 2026 – Budget Measures and Announced Law

The 2026 Federal Budget has reignited fundamental reform of Australia's capital gains tax regime, with draft legislation released shortly thereafter signalling both targeted relief and material integrity tightening. Despite the significance of these changes, cutting across investment structuring, asset holding periods, and cross-border capital flow, there remains limited consolidated analysis of how the measures will operate in practice.

This session provides an examination of the new CGT measures, moving beyond policy headlines to the technical detail that will drive outcomes including:

- What the draft legislation actually does (beyond the announcements);
- Key technical pressure points and drafting gaps;
- Impact on funds, inbound investors and private groups;
- Interaction with existing rules (including rollovers and Div 855);
- Focus areas and emerging integrity risks; and
- Transitional issues and actions to take now.

## Session 16: VIP Presentation

Hear first-hand from a key and influential decision-maker.

## Session 20: Closing Keynote

Relax, sit back and enjoy a plated lunch and some inspirational thoughts from our closing presenter.



## Session 4.1: Family Trust and Interposed Entity Elections – Where Succession Planning Goes Wrong

**Speaker:** Neil Brydges, CTA, Sladen Legal

Family trust elections (FTEs) and interposed entity elections (IEEs) remain essential tools for private clients, unlocking access to a range of tax concessions that would otherwise be unavailable to discretionary trusts. But recent media attention of a high-profile Federal Court proceeding (along with increasing ATO attention) have shone a spotlight on the significant risks when these elections go wrong.

This session will provide a practical framework for advising on when FTEs and IEEs should (and should not) be made in modern succession structures, including their interaction with testamentary trusts and intergenerational wealth transfer. Critically, the session will address the re-emerging issue of family trust distribution tax (FTDT): the trap of distributions between commonly controlled trusts with different test individuals, the alarming indefinite review period and the compounding general interest charge. Practitioners will leave with actionable guidance on identifying legacy exposures, understanding the ATO's current compliance approach and structuring elections appropriately for the next generation.

## Session 5.1: Small Business CGT – Current and Emerging Issues

**Speakers:** Karen Goodfellow, CTA, Goodfellow Tax Advisory, Laura Hussey, ATI, KHQ Lawyers

This session unpacks the current and emerging small business CGT issues for tax practitioners, including:

- Eligibility requirements;
- Calculating market value (impact of comments by Colvin J in *Newmont Canada FN Holdings v CoT*);
- Including “Connected with” and “Affiliate” entities when calculating market value and turnover;
- Active asset test failures;
- Retirement exemption eligibility;
- Look-through earnout rights;
- Death of an owner; and
- Rollover and CGT Event J6.

## Session 6.1: The Future of Trusts: When the Next Generation Walks Away or is Pushed – Trust Exit, Control and Tax Risk

**Speaker:** Raffi Tenenbaum, CTA, William Buck

The proposed trust measures in the 2026-27 Federal Budget, if enacted as announced, will fundamentally change how trusts are used in the SME space.

Historically, SME trusts were established on the assumption of generational continuity, but in many instances adult children are renouncing interests, distancing themselves from trust structures, disputing control or being pushed away from the family trust. In addition to that, older trusts approaching vesting or facing financial stress, and the Federal Budget measures, could redraw the longstanding philosophy behind using trusts altogether.

This session examines the tax, duty and legal consequences when beneficiaries exit or seek to leave a trust in light of the proposed trust measures. It covers the validity and timing of renunciations, Centrelink-related deprivation risk, CGT consequences of altering beneficial interests, and stamp duty exposure where a primary beneficiary is removed. It also addresses trustee insolvency and creditor access to trust assets, and the effect of vesting on carried-forward losses.

The focus is on identifying when succession decisions, control shifts or financial pressure crystallise tax liabilities or forfeit accumulated tax value.

## Session 7.1: SME – What's on Our Radar

**Panellists:** Leanne Connor, CTA, WGC Business Advisors, Matthew McKee, FTI, Brown Wright Stein Lawyers, Todd Want, CTA, William Buck

**Facilitator:** Loreena Gillon, CTA, Arithmos Chartered Accountants

Join us for this insightful session where our panel of experienced practitioners discuss potential issues currently evolving and steps that may be taken to mitigate the risk for SME practices.

The discussion will include:

- Emerging issues in the SME market;
- Implications if issues aren't properly anticipated and addressed; and
- “Best Practice” steps where issues are identified in advance.



## SME continued

### Session 10.1: Issues in Franking for SMEs

**Speakers:** Adam Crowley, ATI, RSM Australia, Giacomo Graziano, RSM Australia

This session explores the key franking issues commonly encountered by SMEs and their advisers, including managing franking account balances, timing of dividends and the consequences of over or under franking.

The session will cover:

- Common franking pitfalls for SMEs;
- Managing franking accounts and dividend strategies;
- Interaction with Div 7A and integrity rules; and
- Practical tips to reduce compliance risk and maximise value.

### Session 11.1: Structuring Into the Concessions

**Speaker:** Stephen Holmes, CTA, WMS Chartered Accountants

Pre-transaction structuring can play a critical role in shaping the tax outcome of a sale, succession plan or business restructure. For founders, family groups and private investors, the challenge is not only identifying what relief may be available, but also choosing a pathway that is workable, properly sequenced and consistent with the integrity rules.

This session will examine the key tax issues that arise when structuring toward a concession or rollover outcome, including the consideration of trading stock and also the interaction between Div 152 and related provisions such as Subdivs 328-G and 124-M. Delegates will gain practical insight into transaction design, eligibility constraints, sequencing risks, and the common implementation traps that can emerge in family groups, M&A, business restructures and succession-driven transactions.

### Session 13.1: When SMEs Cross Borders – Key International Tax Issues to Watch

**Speaker:** Andrew Jones, CTA, BDO

Increasingly, small and medium Australian business perceive business opportunities overseas, including enhanced access to capital, new or larger markets and proximity to suppliers or customers. Pursuing these opportunities can trigger many changes to existing arrangements, including new foreign-incorporated entities, new licensing or distribution arrangements and relocating stakeholders – just to name a few.

However, “going international” can have consequential longer-term tax implications, which this session will consider.

The following topics will be covered:

- Can we redomicile the business? Can we redomicile the people?;
- Tax residency complications and consequences;
- Repatriating wealth from companies and other offshore structures;
- Dealing with withholding taxes, including tax treaties;
- How does an international structure or investor impact succession planning?
- “Sleeper” issues that might be missed: hybrid mismatch, foreign hybrids, controlled foreign companies, permanent establishments; and
- Thin capitalisation rules, including debt deduction creation rules and implications for family groups.

### Session 14.1: Beyond the Will – Unravelling Tax in Deceased Estates

**Speaker:** Dung Lam, CTA, West Garbutt

While death and taxes are inescapable, they are not straightforward. While the main residence and being tax free is sacrosanct (for the moment anyway!) in our system, when the exemption is combined with estate planning, it is easier for things to go wrong.

This session will explore the ATO’s views in TD 2026/D1 as well as related issues.

### Session 15.1: Bendel – Between the Budget, Subdivision EA and Section 100A, is Any Victory Pyrrhic?

**Panellists:** Fiona Dillon, CTA, Australian Taxation Office, Ermelinda Kovacs, Ground Floor Wentworth Chambers, Jonathan Ortner, FTI, Arnold Bloch Leibler

**Facilitator:** Adrian Zuccarini, FTI, Australian Taxation Office

In the wake of the High Court’s decision in *Bendel*, advisers and taxpayers are continuing to grapple with the broader integrity landscape and whether any practical “win” is ultimately offset by other anti-avoidance provisions. This panel will explore the interaction between *Bendel*, Division 7A, Subdivision EA and section 100A, unpacking the ATO’s likely focus areas and the risks that continue to arise in trust and private group structures.

Drawing on practical examples and recent developments, the panel will examine whether *Bendel* meaningfully changes outcomes for taxpayers, or whether the integrity net simply tightens elsewhere. Attendees will gain insight into the evolving compliance environment, key structuring considerations and what advisers should be thinking about moving forward.

## SME continued

### Session 17.1: When Pre-CGT Status is Lost and Opportunities When it is Not

**Speaker:** Andy Milidoni, CTA, Mills Oakley

It surprises many that we still have pre-CGT assets and entities.

Problematically, many assume pre-CGT status and it isn't until a realisation event when proper analysis is undertaken that they receive a rude shock.

This session will cover the rules and circumstances where pre-CGT status can be lost, including:

- Div 149 ITAA97;
- CGT Event K6; and
- ATO Interpretation and *XLZH and FCT* [2025] ARTA 2154.

### Session 18.1: SMSF Advisers – Have You Been Paying Attention?

**Speaker:** Jemma Sanderson, CTA, Cooper Partners Financial Services

The SMSF environment is an ever-changing landscape with advisers' understanding of complying investment requirements essential.

In this session we will explore the latest changes as well as some common misconceptions, including:

- Div 296 – the current state of play;
- Unintended consequences of Div 296;
- Australian tax residency of SMSFs;
- Special considerations for SMSFs following AFCA's recent ruling requiring net assets over \$10 million for sophisticated investor certificates;
- Non arms-length issues including property market valuations; and
- What is the SMSF auditor looking for?

### Session 19.1: Splitting More Than Assets – The Tax Side of Divorce

**Speakers:** Ankit Sharma, CTA, Pitcher Partners, Rachel Vijayaraj, CTA, Brown Wright Stein Lawyers

This session explores the tax considerations that need to be addressed when your client faces a relationship breakdown, including:

- Accessing Commonwealth and state rollover relief (including discussion of recent case law on consent orders);
- Dealing with trusts – changing control of trusts, moving assets out of trusts, UPEs;
- Superannuation splitting (including the practicalities of dealing with “lumpy” assets);
- Application of Div 7A (including 109J); and
- Spousal and child maintenance including child maintenance trusts.

The session will also address the importance of collaborating with your client's family lawyers and assisting in drafting court orders.





# Tax Disputes

## Session 5.2: Navigating ATO Debt – Current Issues and Strategies

**Speakers:** Jeremy Geale, CTA, MinterEllison, Ruth Owen CBE GAICD, Tax Ombudsman

With the ATO continuing to sharpen its focus on debt collection and recovery activity, advisers and businesses are navigating increased scrutiny, tighter payment expectations and evolving administrative approaches.

This session will explore current issues in helping clients managing ATO debt, including payment arrangements, remission requests, director penalty notices, insolvency considerations, debt recovery action, 50:50 arrangements and practical strategies for engaging with the ATO. Gain insights into emerging trends, common pitfalls and how advisers can support clients in managing tax debt risks proactively.

## Session 6.2: Evidence in Tax Disputes

**Speakers:** Angelina Lagana, CTA, Corrs Westgarth Chambers, Catherine Pierce, Chancery Chambers

Disputes are frequently won and lost on the availability and strength of evidence to support the positions taken by the parties. This is true at all stages of the

tax dispute lifecycle (including during reviews and audits) and has been the key factor in the resolution of several recent high-profile tax cases. This session will explore how taxpayers and their advisers should approach the gathering of lay and expert evidence, both proactively in anticipation of revenue authority scrutiny and once a tax dispute materialises. It will also discuss the use of that evidence in support of a position at various stages.

Topics that will be covered include:

- How taxpayers can embed evidentiary discipline early, pressure test factual narratives, brief experts effectively and deploy (or challenge) evidence strategically to resolve matters swiftly and credibly;
- Lessons from recent cases that have turned on the availability or lack of evidence;
- The process of briefing and gathering lay and expert evidence to ensure independence and relevance – including the timing of collating evidence;
- The proactive use of evidence to build, support and maintain a coherent and consistent position; and
- Using evidence to narrow issues, accelerate settlement, and, where necessary, support litigation positions.



# Next Generation

## Session 5.3: Leading in Tax – From Technical Expert to Trusted Adviser

**Speaker:** Tony Frost, Frost Leadership

Clients want advice from technical experts. Even more valuable is an expert who has taken the time to build a strong relationship with the client and to truly understand the client's business and industry. Such experts become trusted advisers who are likely to win repeat instructions from clients and garner referrals to potential new clients. This session will provide you with a framework and practical tips to progress from being a technical expert to a trusted adviser.

## Session 6.3: Financing 101 – Building your International Tax Toolkit

**Speakers:** Stefan Hempelmann, EY, Su-Wen Wong, EY

As global investment structures become increasingly sophisticated, tax practitioners need a practical understanding of how financing arrangements intersect with international tax rules. This session will provide a foundational guide to cross-border financing concepts, key terminology and common structures, while exploring the international tax issues that arise in practice.

The session will equip attendees with the core knowledge and practical insights needed to navigate financing discussions and develop their international tax toolkit.



# Property

## Session 10.2: Current Tax Issues in Property Development

**Speaker:** Sharyn Frawley, PwC

Those working in the property sector have become increasingly sophisticated in the holding structures being adopted. Reflecting this reality, the ATO has refocused its attention on those development arrangements it considers contrived. In seeking to stamp out those ‘contrived structures’, further uncertainty and increased burden has once again been placed on taxpayers as they navigate their arrangements and the ATO rulings.

This session will explore the latest developments impacting property development and long-term construction arrangements, including:

- Recent ATO guidance, such as PCG 2026/D2 and TA 2026/1, and what it reveals about emerging compliance priorities;
- The evolving distinction between passive investment, subdivision and development activities and when capital gains treatment may be at risk;
- Structuring considerations, including joint ventures versus partnerships, and how both legal form and commercial substance influence tax outcomes; and

- Key cases and tribunal decisions, including *Morton* and recent ART matters, and what they mean for the treatment of land and projects as trading stock.

## Session 11.2: Deductions – Rental Properties and Holiday Homes

**Speaker:** Matthew McKee, FTI, Brown Wright Stein Lawyers

The ATO has released significant draft guidance that reshapes how rental property deductions – particularly for mixed-use and holiday homes – are expected to be claimed. With the withdrawal of longstanding rulings and a sharper compliance lens on private use and short-term accommodation, advisers and property owners must reassess existing arrangements.

This session explains the ATO’s proposed compliance approach under PCG 2025/D6 (Apportionment of rental property deductions) and PCG 2025/D7 (Holiday homes and section 26-50). The session will consider what the ATO considers to be “fair and reasonable” apportionment, how risk is assessed for holiday homes and the practical steps to reduce exposure to denied deductions or audit activity. It will cover other issues that need to be considered deductions for rental properties and holiday homes.

Attendees will gain clarity on:

- When expenses must be apportioned versus fully denied;
- How the ATO evaluates private use – especially during peak periods;
- The green, amber and red risk zones for holiday homes;
- Transitional concessions and what to do before 1 July 2026; and
- Impact of deductions for sale of the property.

## Session 13.2: Land Tax Nuances Across the States

**Speaker:** Steven Paterson, Deloitte

Land tax is a deceptively complex area of Australian taxation, with outcomes that can vary materially depending on the jurisdiction, ownership structure and use of land. This session provides a practical and comparative overview of land tax regimes across Australia, highlighting the critical differences between states and territories and the common traps that arise for advisers and property owners.

This session will provide a comparison of land tax frameworks across major states and territories, with a focus on:

- Key differences in thresholds, rates and aggregation methodologies;
- Treatment of trusts, companies, joint ownership and absentee owners; and
- Common pitfalls and audit triggers encountered in practice.





# AI

## Session 17.2: Ethics and AI

**Speaker:** Gabriella Rubagotti,  
Nigel Bowen Chambers

This session explores the ethical and tax-related challenges advisers face when clients navigate family breakdowns, offering actionable strategies to uphold professional standards.

This session considers:

- Ethical considerations when acting for clients in family disputes, including dual representation risks;
- Practical steps for navigating tax obligations during family court proceedings;
- Managing conflicts of interest under Tax Practitioners Board (TPB) discretion guidelines;
- Role of forensic accounting in family law cases (e.g. tracing assets for child support);
- Guidance on collaborating with family lawyers and assisting with court orders; and
- Joint insights from a family lawyer and accountant, with real-world examples.

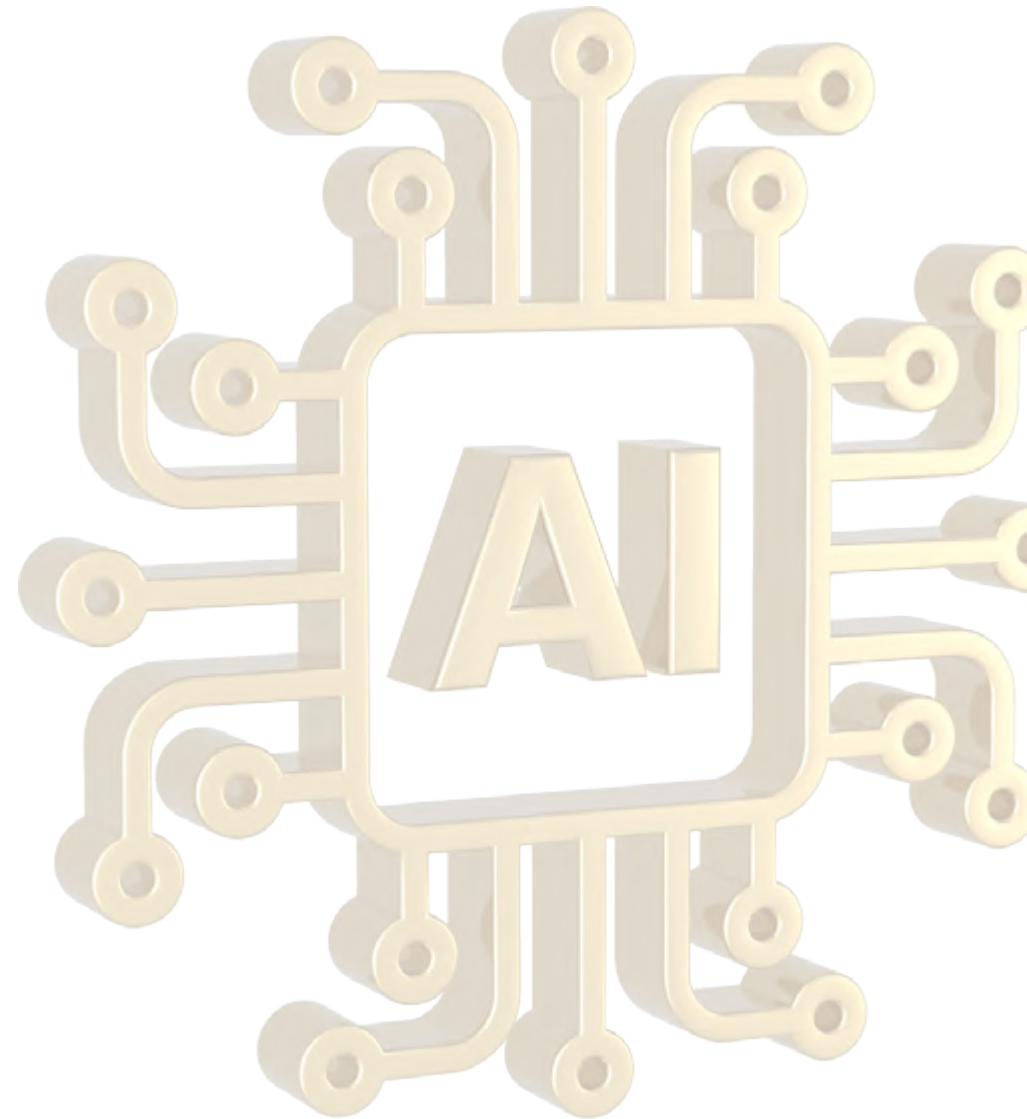
## Session 18.2: Functional Analysis – How Decisions are Being Made by AI

**Speaker:** Ed Hewings, KPMG

As AI becomes increasingly embedded in research, analysis and advice, understanding how decisions are being generated is becoming critical for tax professionals. This session will explore how AI is being used in practice across the profession and the evolving position of the ATO, including governance, ethics, data and analytics foundations.

Moving beyond outputs, the discussion will examine how AI reaches conclusions, the risks of over-reliance, bias and error, and the limitations of machine-generated reasoning in complex tax matters.

The session will consider whether practitioners risk losing independent thinking in an era of instant answers, why professional judgement remains essential, and what skills are needed to critically assess AI-generated insights and advice.





# Hot Topics

## Session 10.3: Part IVA – Implications of Recent Decisions

**Speaker:** Rimma Miller, ATI, Clayton Utz

Australia's general (and specific) anti-avoidance rule in Part IVA of the *Income Tax Assessment Act 1936* continues to evolve through a flurry of court decisions. This year, saw the High Court's resolution of *Commissioner of Taxation v Hicks* [2025] FCAFC 171 (also known as *Irena*) refusing special leave, and *Merchant v Commissioner of Taxation* [2025] FCAFC 56 (currently awaiting a decision from the High Court).

These cases illustrate the increasingly rigorous scrutiny applied to complex commercial and financing arrangements, particularly where tax outcomes are closely linked to structuring choices. They also highlight the interaction between commercial objectives and tax considerations, and the evidentiary weight given to contemporaneous documentation, adviser involvement and the practical realities of the transaction.

This session will examine the key principles emerging from recent Part IVA jurisprudence, including developments in identifying tax benefits, evaluating alternative postulates and assessing purpose under s 177D. The discussion will consider how these decisions may affect the structuring of transactions, the provision of tax advice and litigation strategy for matters involving anti-avoidance provisions.

Practitioners will gain practical insights into how courts are currently applying Part IVA and what the latest cases mean for managing anti-avoidance risk in complex commercial and private group arrangements.

## Session 11.3: FBT Implications for Owners, Controllers and Directors

**Speakers:** Georgia Adams, University Chambers, Courtney Ensor, New Chambers

Fringe Benefits Tax (FBT) continues to be a key integrity area for private groups, particularly where business assets and corporate funds are used by owners, controllers, and directors in informal or closely held arrangements. Recent case law has further clarified when business arrangements may give rise to taxable fringe benefits.

This session will cover:

- Key principles arising from *SEPL Pty Ltd v Federal Commissioner of Taxation* [2026] FCAFC 36, particularly in relation to the use of business assets in closely held groups and whether benefits are provided “in respect of employment”;
- Lessons from *J & G Knowles & Associates Pty Ltd v Commissioner of Taxation* [2000] FCA 196 and the treatment of corporate funds provided to shareholders and directors;
- FBT implications for closely held groups and high-net-worth structures;
- Common risk areas involving shareholder loans, director access to corporate resources, and informal benefit flows; and
- Practical insights and considerations for advisers working with private clients.



## Hot Topics continued

### Session 13.3: R&D Tax Incentive 2026 – What's New and What Matters Most

**Speakers:** To be announced

Keeping abreast of developments in the R&D Tax Incentive regime is essential for taxpayers and advisers alike. This session will explore recent legislative, administrative and compliance developments, examine current ATO and AusIndustry focus areas, and highlight the practical implications for R&D claimants.

Through a review of recent developments and real-world issues, attendees will leave with a clearer understanding of the challenges, risks and opportunities shaping the R&D landscape in 2026.

### Session 17.3: AML and Counter Terrorism – Where Are We Now?

**Speaker:** Richard Storey, Grant Thornton

With expanded anti-money laundering and counter-terrorism financing (AML/CTF) obligations coming into effect from 1 July, professionals are facing a significant shift in compliance expectations. As the regime extends further into legal and accounting services, understanding your responsibilities, and where the boundaries lie, will be critical.

This session will cover:

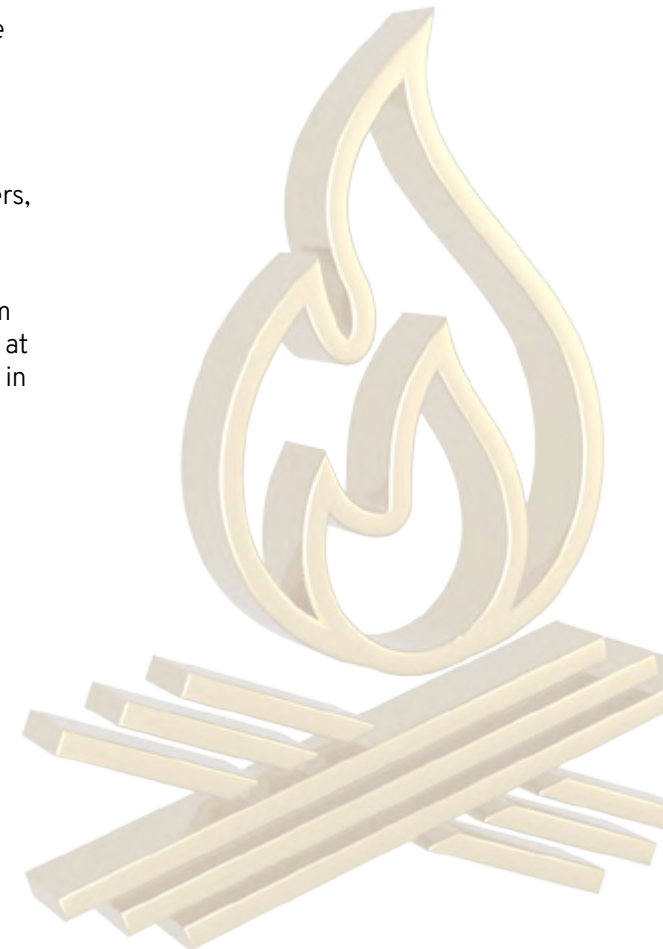
- A refresher of the key AUSTRAC requirements commencing 1 July, including suspicious matter reporting;
- A recap of what the AML/CTF obligations mean in practice across different service areas;
- Client onboarding expectations and what you should already have in place;
- How we are navigating professional obligations, including Tax Practitioners Board considerations, when clients disclose high-risk activity;
- The limits of legal professional privilege in the AML/CTF context; and
- Practical case studies (including property and litigation scenarios) to clarify “what would you do?” situations.

### Session 18.3: GST Update: The Year in Review and What Lies Ahead

**Speaker:** Scott McGill, CTA, Pitcher Partners

From significant court decisions and ATO guidance to emerging compliance and policy issues, the GST landscape continues to evolve. This session will examine the most important GST developments of the past year and consider their implications for taxpayers, advisers and businesses.

Join us for a comprehensive review of recent developments, key lessons from disputes and rulings, and a look ahead at the issues likely to shape GST practice in the coming year.





# Corporate

## Session 4.4: Australia's Thin Capitalisation Regime – Reform, Risk and Practical Implications

**Speakers:** Judith Taylor, CTA, Mallesons, Scott Heezen, Mallesons

Australia's thin capitalisation regime continues to evolve, with significant legislative changes now in effect and an independent review of the rules by the Board of Taxation underway. These developments have materially altered how debt limits are calculated, which entities are affected and the extent to which commercial funding arrangements may give rise to denied deductions.

This session will provide a practical update on the current thin capitalisation rules and explore the difficulties identified in submissions provided through the ongoing review, including:

- A practical update regarding compliance with the new thin capitalisation regime;
- Transitional and integrity issues arising under the new rules; and
- Areas of focus in the thin capitalisation review and potential areas for future reform.

## Session 5.4: Data Centres – An International Tax Case Study

**Panellists:** Priscilla Lee, Wolters Kluwer, Sophie Lewis, EY, Jennifer Ta, KPMG

**Facilitator:** Annemarie Wilmore, Johnson Winter Slattery

The ATO has signalled intense scrutiny on multinational structures. The concern is the potential for tax revenues moving offshore, without appropriate returns for Australia, via the use of structures designed to optimise the tax outcomes for corporates and minimise risk. This session will consider lessons arising from data centres, and current areas of investigation by the ATO. It will also consider the practical implementation questions for dealing with transfer pricing reviews and PE questions in the context of general anti-avoidance provisions.

## Session 6.4: Tax Consolidation – Ins and Outs

**Speaker:** Cameron Blackwood, ATI, Corrs Chambers Westgarth

This session will explore key issues arising for corporate groups in relation to tax consolidation and Multiple Entry Consolidated groups (MEC), with a focus on recent developments, practical challenges and areas of ongoing attention. It will consider structural and integrity issues, asset cost setting, loss transfers and the interaction of consolidation rules with Pillar Two, as well as broader issues relevant to groups that have chosen not to consolidate. The session may also examine recent case law and developments affecting the operation of the regime.

## Session 7.4: Corporates – What's on the ATO's radar

**Speakers:** Australian Taxation Office Representatives

This session will explore current areas of ATO focus relevant to corporate taxpayers, together with broader developments shaping the corporate tax environment.

It is intended to provide a practical overview of recent themes, emerging issues and key areas of attention, and to consider what these developments may mean for taxpayers and advisers in the current landscape.

## Session 10.4: M&A Tax: Navigating the Uncertainty

**Speaker:** Jay Prasad, ATI, Herbert Smith Freehills Kramer

This session will examine key transactional tax issues, with particular attention on recent developments, anticipated changes and emerging tax issues arising in M&A, including:

- The current status of tax rollovers in the market, including the anticipated approach to back-to-back rollovers;
- The impact of the proposed amendments to the Div 855 regime, including the proposed notification regime for non-IARPI vendors, the expansion of real property interests and changes to the testing period for PAT;
- The current state of play on earnout arrangements; and
- Other topical M&A tax issues.

## Corporate continued

### Session 11.4: Treaty Access and Tax Presence – Navigating Residency, Permanent Establishment and the MLI

**Speaker:** David Watkins, CTA, DW Tax

This session will explore the technical fundamentals of residency, permanent establishments and treaty shopping, with a focus on the practical issues that remain highly relevant in cross-border tax planning and structuring. It will examine the key principles in this area, including what treaty shopping is and is not, and how treaty provisions and the MLI affect the analysis.

### Session 13.4: Beyond Compliance – What Corporate Tax Leaders are Focused on Now

**Panellists:** Lisa Escudero, CTA, Atlassian, Miryam Meza, CTA, CIMIC, Ray Nasr, Sunrice Group, George Spathis, Commonwealth Bank of Australia

In a period of rapid change and increasing expectations, heads of tax are navigating complex technical, regulatory and people-related challenges. This panel brings together senior tax leaders to discuss what is genuinely on their radar right now. The conversation will explore how tax priorities are evolving, how leaders are responding to heightened scrutiny and transformation agendas, and why a people-powered approach is critical to sustaining performance and influence.

### Session 14.4: Debt Deduction Creation Rules – Practical Applications

**Speakers:** Ellen Thomas, ATI, Allens, Jessica Flatters, Allens

The debt deduction creation rules have become an important consideration for corporate groups undertaking related party financing, restructures and acquisition activity. With the ATO continuing to provide guidance on the operation of the rules and its compliance approach, taxpayers need to carefully assess how the rules may apply in practice and where the key risk areas sit. This session will explore the practical application of the debt deduction creation rules, including the scope and operation of the rules, the types of transactions and arrangements that may attract attention, and the practical issues that arise in identifying whether a debt deduction has been created in connection with a relevant arrangement. It will also consider the interaction of the rules with broader thin capitalisation and structuring issues, as well as the ATO's current compliance focus and areas where groups may need to revisit existing or proposed arrangements.

### Session 15.4: Royalties and Intellectual Property – Structuring, Substance and Scrutiny

**Speaker:** David Lewis, Sixth Floor Selborne Wentworth Chambers

Royalties and intellectual property remain firmly in the ATO's sights, with recent cases and guidance continuing to reshape how taxpayers assess cross-border payments and intangible related arrangements. This session will examine the latest developments and their practical implications for corporate groups, including:

- Characterising payments as royalties, including when payments for software, digital offerings, services and other IP-related rights may be treated as royalties for Australian tax purposes;
- Embedded royalties in focus, including the ongoing implications of *PepsiCo* and recent case law for supply, distribution and other arrangements involving bundled or intangible rights, and where the ATO may go next;
- Royalty withholding tax and treaty issues, including key issues arising in the interaction between domestic law and Australia's treaty network;
- Intangibles and transfer pricing, including practical issues in identifying, pricing and allocating returns attributable to IP in connection with the development and exploitation of intangibles.

### Session 17.4: Private Capital in Focus – Tax Risk, Regulation and Market Direction

**Speaker:** To be announced

This session will examine recent tax and regulatory developments relevant to the private capital sector, with a focus on current issues affecting inbound investment, transaction execution and ATO engagement.

Topics to be covered include:

- The current FIRB process and the practical challenges private capital clients are facing in obtaining approval;
- Tax conditions currently being imposed and the ATO's approach to those conditions;
- The ATO's Private Equity Focus Group and the key issues that have been identified as areas of focus; and
- Domestic and treaty developments affecting investment flows into Australia.

## Corporate continued

### Session 18.4: Australia's Public CBC Reporting – Compliance and Strategy

**Speakers:** Jonathon Lee, BDO, Jital Solanki, BDO

This will be a high-impact briefing on Australia's new tax transparency laws. This session will cover who must report, what data becomes public, and how to manage the shift from private to public disclosure.

Attendees will obtain guidance on how to navigate key issues, including:

- Scope and deadlines – Identify if you meet the \$1 billion global income threshold and prepare for the 1 July 2024 start date (first filings due by 30 June 2026);
- Data requirements – Breakdown of the mandatory metrics (revenue, profit, tax paid, etc.) for Australia and the “specified” jurisdictions;
- The "Public Narrative" – How to draft the mandatory “Approach to Tax” statement to explain your tax strategy to the public and regulators; and
- Lodgement and risks – Navigating the ATO XML schema requirements and avoiding substantial non-compliance penalties.

### Session 19.4: Economic Update

**Speaker:** Pat Bustamante, Westpac

This session provides a timely economic update, setting the broader context for tax, policy and business decision-making. In this session we will explore current global and domestic economic conditions, key risks and opportunities, and what the outlook means for Australian businesses operating in an increasingly uncertain environment. The session will highlight the economic forces shaping government policy, investment decisions and the tax landscape over the year ahead.



# Venue

## International Convention Centre, Sydney

ICC Sydney offers convenient access to Australia's most cosmopolitan city. A major financial hub in the Asia-Pacific region, it's home to 43 local and foreign-owned banks, over 600 multinational firms and Australia's largest professional services, finTech and technology industries.



3  
floors of  
conference  
space



5  
minutes from  
the CBD



6  
star green  
building



## Getting there

### By air or road

**Flights:** Qantas, Virgin Australia and Jetstar operate services to Sydney. Delegates are advised to book early to secure best pricing.

**By car or taxi:** from Sydney Airport, it is approximately 30 minutes travel time.

**Accommodation:** Our travel provider, Conference National, has negotiated accommodation for delegates travelling to Sydney.

### Sydney weather

In September in Sydney, the spring days are warm with low humidity. Average daily temperature sits at around 23 degrees celsius.

# Places to stay

Our accommodation partner, Conference National, has negotiated discounted accommodation for delegates travelling to Sydney.

[Book your accommodation](#) ▶



## Darling Harbour Sofitel Sydney

Rate from \$365 per night\*

2 min walk to ICC



## W Sydney

Rate from \$365 per night\*

5 min walk to ICC



## Novotel Darling Harbour

Rate from \$310 per night\*

12 min walk to ICC



\*Subject to availability

# Activities

## Included networking activities

Our biggest networking opportunities are included in your registration

### Welcome Reception

 Sofitel Darling Harbour

Join us for cocktails, canapes and connecting with colleagues, as you enjoy views of Sydney's skyline and Darling Harbour.


**Date** Wednesday, 2 September 2026

**Time** 5:30-7:30pm

**Price** Included in the full registration fee.  
Additional tickets \$80 per person.

**Dress** Business or business casual

### The Tax Summit Gala Dinner

 ICC Sydney

Make this the must-attend event of The Tax Summit – our much-loved, once per year occasion, The Tax Summit Gala Dinner.

**Date** Thursday, 3 September 2026

**Time** 7:00pm onwards

**Price** Included in the full registration fee.  
Additional tickets \$175 per person.

**Theme** Dancing through the decades – come dressed inspired by your favourite decade!

**Dress** Evening / Cocktail

Proudly sponsored by



# Recommendations

There's so much to see and do while in Sydney.

Whether you're attending alone, with your team, or find yourself searching for a dinner spot with a new connection you've made at the Summit, here are our top recommendations close to ICC and beyond.



## Fashion finds

There's a lot to see and uncover in Sydney when it comes to fashion. From the high-end stores along King and George Streets, to the hidden gems found within The Galleries and QVB, there are some great buys and vintage finds around every corner.

Photo by Binita Saha



## Fine food and flavours

Discover Sydney's world-class dining scene – exceptional food and memorable experiences await. Neptune's Grotto, Watermans and Grandfather's are all new local stars worth a visit.



## Fast ferry

Hop on board one of Sydney's fast ferries and head over to Manly and visit the iconic tree-lined beach, see breathtaking views from North Head or enjoy delicious waterside places to eat and lots of fun family activities.



**Recommendations** continued

# If you have a day to spare



## Back to nature

### Blue Mountains

Not only can you get your steps up on one of the region's forest walks through ancient trees and ferns, the Blue Mountains are also home to some incredibly picturesque places where you can rest your feet and stay for the night.

[Find out more ►](#)



## Venture outdoors

### Royal National Park

The Royal National Park offers plenty of opportunities for fishing, bushwalking, birdwatching and whale watching. There are many places of historic significance throughout, including 1,000-year-old engravings carved into the rocks by the traditional owners of the land, the Dharawal people.

[Find out more ►](#)



## Historic hideaways

### Southern Highlands

A one-hour drive south-west of the city, the Southern Highlands is a region of historical rural townships set among rolling hills and state forest. Home to several wineries, take the time to enjoy cool-climate wines over a long lunch among the vineyards.

[Find out more ►](#)



## Summer bay

### Palm Beach

Just an hour's drive from the city centre is Sydney's stunning Palm Beach. There are plenty of places to relax and unwind or head up to the Barrenjoey Lighthouse and take in the glorious views of Pittwater.

[Find out more ►](#)

# Event info



## Discounts



### Advance pricing

All registrations received and paid for on or before Friday, 3 July 2026 will be entitled to an advance registration discount.



### Early bird registration

All registrations received and paid on or before Friday, 31 July 2026 will be entitled to an early bird discount.

**Please note:** All registration fees do not include accommodation, hotel incidentals or transfers.



### Group discounts

Purchase four full registrations (advanced, 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).



### Employer tickets

Flexible ticket options are ideal for firms wanting to send multiple employees to sessions of their choice. See page 34 for more information.

## Event Info continued

### Confirmation of Registration

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

### 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 included. Alternatively, you can edit your profile visibility settings in the virtual attendee hub at any time during the event.

### Continuing Professional Development (CPD)

Attendance at the conference counts for 20 hours of CPD with The Tax Institute.

### The Tax Institute's Attendee Hub

Following registration, delegates will receive instructions by email on how to access to The Tax Summit's digital attendee hub. Delegates can select, swap and change sessions, view event information, download materials (technical papers and presentations), complete survey forms, view sponsors and more. Delegates

All delegates are encouraged to access the platform prior to the event. Technical papers and PowerPoint presentations will be available on the attendee hub approximately five days before the event. These materials, along with all on-demand session recordings, will be available for delegates to view and download for six months post-event.

### Networking Activities

#### Welcome Reception

This year, the Welcome Reception will be held at the Darling Harbour Sofitel. It is a short walk from the International Convention Centre and The Tax Institute team will be on hand to provide you with directions.

#### Tax Summit Gala Dinner

This year, The Tax Summit Gala Dinner will be held at the Tax Summit venue, the International Convention Centre.

#### Dress Code

Business or business casual attire is suitable for the duration of the conference. For the gala dinner, the dress code is evening or cocktail.

### 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).

### Cancellation Policy

The Tax Institute reserves the right to alter, amend or cancel any of the arrangements in the program. Should a face-to-face event be cancelled due to events beyond The Tax Institute's reasonable control (e.g. acts of God, pandemics, health-related events or government requirements), we will endeavour to transition to an online format. If there is a difference in price, a credit will be provided to delegates for future use.

It is a condition of registration that an administration fee of 20% of the registration fee will be charged for cancellations. Cancellations must be received in writing five working days before the event. No refund will be given for cancellations received within five working days of the event. A replacement attendee 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 arrivals or non-arrivals due to transport delays.

### Enquiries

For further information regarding this event, 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).



# Register now

## Individual ticket

This full registration ticket gives you access to the full Summit experience.

### Inclusions

- ✓ Participation in the full program
- ✓ Online access to presentations and technical papers via The Tax Institute CPD app
- ✓ Welcome Reception and Gala Dinner
- ✓ Catering and refreshments during Summit hours

**Register via form**

included in this brochure

## Group booking

Purchase 4 x full registrations, get the fifth free.<sup>^</sup>

<sup>^</sup> The free fifth registration must be of equal or of less value to the four paid registrations.

**Register via email**

Contact the BRM Team

## Employer ticket

Flexible ticket options ideal for firms wanting to send multiple employees to sessions of their choice.

### Options\*

- **Classic** – Up to 6 attendees and 24 sessions
- **Plus** – Up to 18 attendees and 36 sessions
- **Premium** – Up to 30 attendees and 60 sessions

### Inclusions

- ✓ Attendees will receive access to all plenary sessions\*

\* Does not include attendance at the Seated Lunch (Session 20) on Day 3. However, this session can be selected as part of the employees' session choices. Terms and Conditions apply.

**Register via form**

included in this brochure

Save  
**\$400**

Advanced registration  
before **03. 07. 2026**

Save  
**\$200**

Early bird registration  
before **31. 07. 2026**

**Register online** ▶

### Phone

1300 829 338

### Post

The Tax Institute  
Level 21, 60 Margaret Street  
Sydney NSW 2000

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 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.

### 2 Full conference registration

|   | Member                           | New member*                      | Non-member                       |
|---|----------------------------------|----------------------------------|----------------------------------|
| <b>Advanced registration</b> Received on or before 3 July 2026    | <input type="checkbox"/> \$1,695 | <input type="checkbox"/> \$2,090 | <input type="checkbox"/> \$1,995 |
| <b>Early bird registration</b> Received on or before 31 July 2026 | <input type="checkbox"/> \$1,895 | <input type="checkbox"/> \$2,290 | <input type="checkbox"/> \$2,195 |
| <b>Standard registration</b> Received after 31 July 2026          | <input type="checkbox"/> \$2,095 | <input type="checkbox"/> \$2,490 | <input type="checkbox"/> \$2,395 |

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

To book accommodation, please visit our dedicated website courtesy of our travel provider, Accommodation Link: [book.accommodationlink.com.au/tts-2026/delegate](http://book.accommodationlink.com.au/tts-2026/delegate)

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

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

- save over **\$215 off Affiliate membership** for the first 12 months
- access member-only prices to this and future events
- access all member-only technical resources.

Find out more about membership at [taxinstitute.com.au/membership](http://taxinstitute.com.au/membership)

### 3 Technical session selections

|     |           |              |          |    |                 |            |
|-----|-----------|--------------|----------|----|-----------------|------------|
| SME | Corporate | Tax Disputes | Property | AI | Next Generation | Hot Topics |
|-----|-----------|--------------|----------|----|-----------------|------------|

#### Wednesday, 2 September 2026

|              |                                      |                                      |                                      |                                      |
|--------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| 12:00–1:00pm | <input type="checkbox"/> Session 4.1 | <input type="checkbox"/> Session 4.4 |                                      |                                      |
| 2:00–3:00pm  | <input type="checkbox"/> Session 5.1 | <input type="checkbox"/> Session 5.2 | <input type="checkbox"/> Session 5.3 | <input type="checkbox"/> Session 5.4 |
| 3:30–4:30pm  | <input type="checkbox"/> Session 6.1 | <input type="checkbox"/> Session 6.2 | <input type="checkbox"/> Session 6.3 | <input type="checkbox"/> Session 6.4 |
| 4:30–5:30pm  | <input type="checkbox"/> Session 7.1 | <input type="checkbox"/> Session 7.4 |                                      |                                      |

#### Thursday, 3 September 2026

|                 |                                       |                                       |                                       |                                       |
|-----------------|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|
| 10:30–11:30am   | <input type="checkbox"/> Session 10.1 | <input type="checkbox"/> Session 10.2 | <input type="checkbox"/> Session 10.3 | <input type="checkbox"/> Session 10.4 |
| 11:30am–12:30pm | <input type="checkbox"/> Session 11.1 | <input type="checkbox"/> Session 11.2 | <input type="checkbox"/> Session 11.3 | <input type="checkbox"/> Session 11.4 |
| 2:00–3:00pm     | <input type="checkbox"/> Session 13.1 | <input type="checkbox"/> Session 13.2 | <input type="checkbox"/> Session 13.3 | <input type="checkbox"/> Session 13.4 |
| 3:30–4:30pm     | <input type="checkbox"/> Session 14.1 | <input type="checkbox"/> Session 14.4 |                                       |                                       |
| 4:30–5:30pm     | <input type="checkbox"/> Session 15.1 | <input type="checkbox"/> Session 15.4 |                                       |                                       |

#### Friday, 4 September 2026

|                 |                                       |                                       |                                       |                                       |
|-----------------|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|
| 9:30–10:30am    | <input type="checkbox"/> Session 17.1 | <input type="checkbox"/> Session 17.2 | <input type="checkbox"/> Session 17.3 | <input type="checkbox"/> Session 17.4 |
| 11:00am–12:00pm | <input type="checkbox"/> Session 18.1 | <input type="checkbox"/> Session 18.2 | <input type="checkbox"/> Session 18.3 | <input type="checkbox"/> Session 18.4 |
| 12:00–1:00pm    | <input type="checkbox"/> Session 19.1 | <input type="checkbox"/> Session 19.4 |                                       |                                       |

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**

## 4 Social function selections

### DAY ONE - WEDNESDAY 2 SEPTEMBER 2026

#### Welcome Reception

The Summit Welcome Reception on Wednesday 2 September 2026 is included in the full Summit registration fee.

- I confirm I WILL attend the Welcome Reception OR  
 I WILL NOT attend

| Additional tickets to Welcome Reception                    | Cost | No. of tickets | Name/s and dietary requirements |
|--|------|----------------|---------------------------------|
| <input type="checkbox"/> YES, I require additional tickets | \$80 |                |                                 |

### DAY TWO - THURSDAY 3 SEPTEMBER 2026

#### Gala Dinner

The Tax Summit Gala Dinner on Thursday 3 September 2026 is included in the full Summit registration fee. For catering purposes, please indicate whether you will attend the dinner.

- I confirm I WILL attend the Gala Dinner OR  
 I WILL NOT attend

| Additional tickets to Gala Dinner  | Cost    | No. of tickets | Name/s and dietary requirements |
|--|---------|----------------|---------------------------------|
| <input type="checkbox"/> YES, I require additional tickets   | \$175   |                |                                 |
| <input type="checkbox"/> Table of 10: YES, I require additional tickets to complete my table of 10<br>Guest names must be advised in writing no later than Friday 28 August 2026 | \$1,750 |                |                                 |

## 5 Payment summary

|  |    |                      |
|--|----|----------------------|
| Summit registration                                      | \$ | <input type="text"/> |
| Welcome Reception – additional guest tickets (\$80 each) | \$ | <input type="text"/> |
| Gala Dinner – additional guest tickets (\$175 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.

## 6 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

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](http://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/tax-summit](https://taxinstitute.com.au/tax-summit)

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.

### Registration options

|  | Group booking   | Classic                    | Plus                       | Premium                    | Tailored  |
|--|---|----------------------------|----------------------------|----------------------------|---|
| <b>Best for</b>  | Full Registrations  | SME                        | Mid-Tier                   | Corporate                  | Large/National  |
| <b>Early bird registration</b><br>Received on or before 31 July 2026 | Purchase 4 x full registrations and receive the 5th full registration free* | \$3,700                    | \$4,950                    | \$7,700                    | For larger teams or complex needs, our Tailored option offers maximum flexibility across session access, team size, and networking.<br><br>Contact the <a href="#">BRM Team</a> to design a custom package that fits your organisation. |
| <b>Standard registration</b><br>Received after 31 July 2026          | -   | \$3,900                    | \$5,150                    | \$7,900                    |   |
| <b>Flexibility*</b>  | -   | Your choice of 24 sessions | Your choice of 36 sessions | Your choice of 60 sessions |   |
| <b>Team attendance</b>   | 5 attendees   | Up to 6 attendees          | Up to 18 attendees         | Up to 30 attendees         |   |
| <b>Networking Welcome Reception tickets</b>                          | Included for all delegates  | x2 free passes             | x5 free passes             | x10 free passes            |   |
| <b>To register</b>   | Please contact <a href="#">BRM Team</a>                                     | Complete the form overleaf | Complete the form overleaf | Complete the form overleaf |   |

\*5th registration must be of equal or lesser value to the other registrations. No other discounts can be applied.

#### All Employer Ticket attendees receive:

- Access to Plenary sessions 1, 2, 3, 8, 9, 12 and 16 **plus individual session selections.**
- Electronic access to download available technical papers and presentations
- Morning tea, lunch and afternoon refreshments
- CPD hours allocated according to attendee (1 session = 1 CPD hour per attendee)

Please note all sessions are face-to-face only.

#### 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.
- Once each individual's session selections are registered, they will receive a confirmation email.

#### Once you have registered

You will receive a tax invoice and registration confirmation email.

For event enquiries, please contact us at [BRMTeam@taxinstitute.com.au](mailto:BRMTeam@taxinstitute.com.au) or call direct on +61 8 6165 6606.

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

| Ticket type  | Early bird*                      | Standard                         | No. of tickets | Sub-total |
|--|----------------------------------|----------------------------------|----------------|-----------|
| Classic  | <input type="checkbox"/> \$3,700 | <input type="checkbox"/> \$3,900 |                |           |
| Plus   | <input type="checkbox"/> \$4,950 | <input type="checkbox"/> \$5,150 |                |           |
| Premium  | <input type="checkbox"/> \$7,700 | <input type="checkbox"/> \$7,900 |                |           |
| <input type="checkbox"/> Welcome Reception – Additional Ticket |                                  | \$80                             |                |           |
| <input type="checkbox"/> Gala Dinner Ticket                    |                                  | \$175                            |                |           |
| <b>Total payable \$</b>  |                                  |                                  |                |           |

\*Received on or before 31 July 2026

## 2 Co-ordinator contact details

Title:  Mr  Mrs  Miss  Ms

First name:

Last name:

Position:

## 2 Co-ordinator contact details (cont)

Company:

Address:

Suburb:  State:  Postcode:

Telephone:  Mobile:

Email:

## 3 Payment method

Please note: all registration payments must be made prior to the event

Credit card:  AMEX  Visa  Mastercard

Name on card:

Card no.:  Expiry date:

Cardholder's signature:

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

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

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**To register**

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

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

# Thank you

The Tax Institute gratefully acknowledges the generous assistance of members of The Tax Summit Organising Committee and The Tax Summit Program Committee.

## The Tax Summit Organising Committee:

Tim Sandow, CTA, President, The Tax Institute, Chair  
Paul Banister, CTA, Grant Thornton  
Leanne Connor, CTA, WGC Business Advisors  
Sandra Farhat, FTI, EY  
Marg Marshall, CTA, WLF Accounting Advisory

Rae Ni Corraidh, CTA, TaxBanter  
Daniel Smedley, CTA, Sladen Legal  
Jerome Tse, CTA, Mallesons  
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