The Tax Institute





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

SME

Laura Hussey, ATI, KHQ Lawyers, Chair, SME Stream Chaya Lal, FTI, PKF, Chair, Organising Committee Karen Goodfellow, CTA, Goodfellow Tax Advisory Greg Judd, ATI, Arnold Bloch Leibler Russell Krupp, CTA, BlueRock Archana Manapakkam, FTI, Velocity Legal

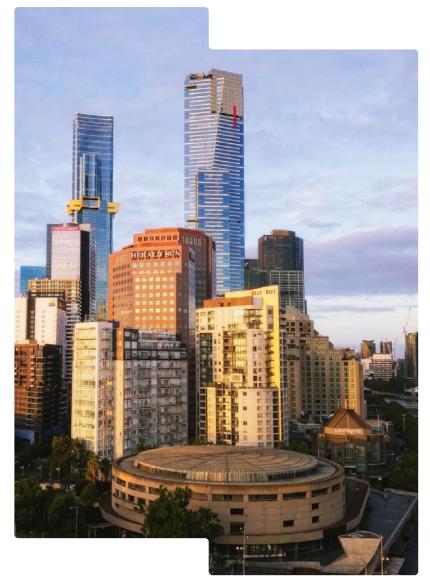
Corporate

Luke Imbriano, FTI, Corrs Chambers Westgarth, Chair, Corporate Stream Tyrone Liu, Deloitte Narelle McBride, CTA, PwC Justin Order, ATI, KPMG Joseph Phan, PKF Melbourne Belinda Spence, CTA, Pinnacle Group

Hot topic

Stephen Chen, CTA, MinterEllison Chair, Hot Topic Stream Christian Febbraro, FTI, Piper Alderman Jeremy Makowski, FTI, Coghlan Duffy Yvonne Matheson, Australian Taxation Office Matthew Meng, Victorian Bar Sylvester Urban, King & Wood Mallesons





Welcome

We're thrilled to welcome you to the VIC Tax Forum, taking place on 19–20 March 2026 at W Melbourne. This annual gathering remains a dynamic hub for Victoria's tax professionals, offering the chance to exchange ideas, sharpen expertise, and stay ahead in a rapidly evolving tax landscape.

Our program combines technical sessions, practical insights, and interactive panels designed to equip delegates with the latest knowledge across all areas of tax—including superannuation, CGT, M&A, state taxes, tax governance, and AI.

Program highlights

- Navigating the shifting landscape of tax policy: Our expert panel decodes the forces driving Australia's tax policy and what they mean for practitioners, businesses, and the community.
- **Trust in transition:** Explore how evolving governance standards, court decisions, and revenue scrutiny impact trust drafting, administration, and advice.
- **Distributions and franking credits in the spotlight:** A fast-paced session on anti-avoidance rules, ATO guidance, and real-world examples, with practical tips to keep clients compliant.

We encourage you to learn, network, and engage—whether you're an experienced practitioner or new to the field, the Forum offers something for everyone.

We sincerely thank our Organising Committee and session chairs for curating a program of exceptional quality. Their expertise, combined with leading speakers' contributions, ensures the Forum remains a must-attend event for the Victorian tax profession.

We look forward to welcoming you to Melbourne for two days of insightful discussion, practical takeaways, and connection with your local tax community.



Chaya Lal, FTI, PKF Melbourne Chair, VIC Tax Forum Organising Committee

Early bird pricing offer Register on or before Friday, 20 February 2026 to save!



Laura Hussey, ATI, KHQ Lawyers Chair, SME Stream

- 3 -



Luke Imbriano, FTI, Corrs Chair, Corporate Stream



Stephen Chen, CTA, MinterEllison Chair, Hot topics Stream

Day 1 Thursday, 19 March 2026

Time *AEDT	Session
8:00-8:30am	Registration
8:30-9:00am	Welcome and President's address
	Speakers: Chaya Lal, FTI, PKF, Chair, Organising Committee, Tim Sandow, CTA, President, The Tax Institute
9:00-10:00am	Session 1: Navigating the shifting landscape of tax policy
	Panellists: Julie Abdalla, FTI, The Tax Institute, John Kehoe, Australian Financial Review, Dr Niv Tadmore, CTA, Jones Day
	Australia's tax landscape is at a critical juncture. As economic pressures, global developments, and domestic reform debates converge, the tax system faces increasing calls for clarity, fairness, and adaptability. In this opening session our expert panel will come together to unpack the key forces shaping Australia's tax policy direction, and what they mean for practitioners, businesses, and the community.
	The panel will explore:
	• Current policy priorities and reform directions at both federal and state levels;
	• The intersection between tax, politics, and public perception;
	 How global developments are influencing domestic tax design;
	 The practitioner's role in shaping and responding to policy change; and
	• What lies ahead – The outlook for Australia's tax framework in the future.
10:00 -10:30am	Morning tea



Day 1 Thursday, 19 March 2026 continued

Time *AEDT	SME Stream	Corporate Stream
10:30-11:30am	Session 2A: Trust in transition Speaker: Daniel Smedley, CTA, Sladen Legal Trusts are in a period of transition. Older deeds are meeting contemporary governance expectations, courts are testing how ownership is characterised in real life, and revenue authorities are paying closer attention to timing and purpose. This session focuses on what that transition means for day-to-day drafting, administration and advice. Who really owns what, and how to modernise older deeds prudently, focusing on practical characterisation of beneficial ownership, when a court-approved update is appropriate, and how to avoid creating a substantively different arrangement. Exercising trustee discretions without process issues or fettering, showing genuine consideration of relevant beneficiaries, recording reasons at the right level, managing conflicts, and avoiding drafting or conduct that limits future choices. Present entitlement, timing and disclaimers, making resolutions effective at the right time, aligning streaming with the paperwork and cash flows, and recognising the limits of after-the-event disclaimers. Integrity rules now shaping trust planning, assessing purpose and commercial rationale, identifying arrangements that attract scrutiny, documenting the decision path, and selecting safer, commercially grounded alternatives.	Session 2B: Case update – International tax in the spotlight Speakers: Michael Clough, FTI, King & Wood Mallesons, Eugene Wheelahan KC, FTI, Victorian Bar This sessoin will consider the current tax landscape for cross-border transactions, with a deep dive into some important recent cases, including: • Tax treaties and disputes – How the decision in Oracle impacts the resolution of disputes, either through the domestic judicial process or the Mutual Agreement Procedure (MAP) under Australia's treaty network; • The ATO's use of the diverted profits tax (DPT); • Embedded royalties and intangibles – The current state of play six months on from the PepsiCo High Court ruling; and • State of play in Transfer Pricing.



Day 1 Thursday, 19 March 2026 continued

Time *AEDT	SME Stream	Corporate Stream
11:30am-12:30pm	Session 3A: Small business CGT concessions – When being 'small' and in 'business' isn't enough	Session 3B: M&A in focus – Recent themes, non-resident CGT and transaction structures
	Speaker: Leanne Connor, CTA, WGC Business Advisors	Speaker: Enzo Coia, CTA, KPMG
	It will be hard for many to believe that the small business CGT concessions in Div 152 were introduced in 1999. Twenty seven years later and they remain as complex as ever – in fact more so. This session will bypass the 'basics' of the four concessions, and the basic eligibility conditions, to focus on some of the lesser known traps, opportunities and risk areas in the provisions, including: • Applying the active asset test for shares (watch out for those shareholder loans); • Ensuring all allowed liabilities are taken into account for the \$6 million test, but no more than that; • Valuation issues for the purposes of the MNAV test and more.	 This session will provide a timely update on key developments in the taxation of mergers and acquisitions. It will use practical examples to explore: An overview and the latest updates and decisions about how capital gains tax applies to non-residents, as well as announced changes to those rules; Key issues when structuring deals involving foreign investors or capital; and Current ATO focus areas and recent guidance affecting M&A transactions.
12:30-1:30pm	Lunch	



Day 1 Thursday, 19 March 2026 continued

Time *AEDT	SME Stream	Corporate Stream		
1:30-2:30pm	Session 4A: Losing pre CGT status – Key issues and emerging challenges Speaker: Archana Manapakkam, FTI, Velocity Legal	Session 4B: Distributions and Franking Credits in the spotlight Speakers: Rhys Jewell, CTA, Partner, Corrs Chambers Westgarth, Nathan Unitt		
	This session will explore the complex and evolving issues surrounding the loss of pre-CGT status for assets and interests, with a focus on practical application and recent ATO guidance.	Corrs Chambers Westgarth This session will provide an overview of topical anti-avoidance measures related to distributions and franking credits, including ATO activity. We will explore:		
	With reference to the relevant case law as a framework, the session will examine the boundaries of when and how pre-CGT status can be lost, particularly in the context of restructures, changes in ownership, and the treatment of goodwill and debts. The discussion will also address implications for deceased estates (Subdivision 128 rollovers) and jointly owned assets, offering insights into how these situations interact with pre-CGT rules and what practitioners should be aware of in practice.	 Section 207-145, franking credit policy and government intended "wastage" of franking credits. Equity funded distributions, s 207-159 and PCG 2025/3; The Merchant litigation (dividend stripping); The qualified person rules (45-day rule), section 177EA and ATO compliance activity (including the ATO PCG); The Lerna litigation (s45B); and Practical and worked examples. 		
2:30-3:00pm	Afternoon tea			
3:00-4:00pm	Session 5A: Div 7A - Practical issues and current developments Speakers: Chris Wookey, CTA (Life), Chris Wookey Chartered Accountants, Nick Wookey, KHQ Lawyers	Session 5B: Heads of tax panel Panellists: Sharon Arasu, Carsales, Ben Lee Kong, REA Group, Adalene Pandeli, Cole Alex Sequeira, Acciona Group		
	This session will provide an update on the latest Division 7A developments and	Facilitator: Narelle McBride, CTA, PwC		
	explore the practical challenges faced by practitioners in applying the rules to private groups.	Join senior tax leaders to discuss strategic insights, emerging trends, and k challenges in the evolving tax landscape. This session will discuss topical is:		
	It will explore common compliance issues, emerging ATO focus areas, and strategies for managing Division 7A exposures in light of ongoing reform discussions and interpretative guidance.	and developments impacting corporates.		
	The session will also consider the interaction between Division 7A and related areas, including unpaid present entitlements (UPEs), interposed entity arrangements, and restructuring transactions, providing attendees with practical tools to manage Division 7A risks effectively.			

Day 1 Thursday, 19 March 2026 continued

Time *AEDT	SME Stream	Corporate Stream		
4:00-5:00pm	Session 6A: Revenue versus capital Speaker: Adam Dimac, Hall & Wilcox The distinction between capital and revenue is a foundational concept in tax law, yet it remains a highly litigated and evolving area. This session revisits the core principles underpinning the capital/revenue divide, explores why the issue continues to resurface, and examines how recent developments – including the Morton case – are reshaping the legal principle. This session will discuss: • The enduring relevance of the capital/revenue distinction – Why this "old	Session 6B: Tax governance and the journey to Justified Trust - Then, now and what's next Panellists: Emily L Marsden, EY, Adam Pritchard, Australian Taxation Office Facilitator: Joseph Phan, PKF Advisory This session will explore the evolving landscape of tax governance in Australia, tracing the ATO's journey alongside taxpayers toward achieving justified trust. We'll reflect on how expectations have shifted over the past decade and what lies ahead. This session will cover: Insights from ATO reviews of tax governance across private and public groups;		
	 chestnut" still matters for practitioners and clients alike; Frameworks and guiding principles – Revisiting the key judicial tests and statutory considerations; Recent developments and case law – A dive into Morton v FCT and capital / revenue in the property law cases as well as recent GST cases such as VZFS and Commissioner of Taxation (Taxation) [2025] ARTA 2013, and their implications; Emerging issue – Exploring the "reverse Whitfords Beach" scenario and recent case law where taxpayers abandon a scheme before completion; and Strategic considerations for advisors – How to approach uncertain classifications, manage risk, and support clients with defensible positions. 	 How the ATO's stance has evolved: key expectations, focus areas, and why governance remains critical; Taxpayer experiences: navigating practical challenges versus meeting ATO benchmarks; and Actionable steps to strengthen governance frameworks – Moving from "sufficient" to "robust." 		
5:00pm	Networking reception			



Networking reception

Join your colleagues, peers and our esteemed presenters for an evening of drinks, canapes and networking, poolside at the W Melbourne.

Date: Thursday, 19 March 2026

Time: 5:00-7:00pm Venue: W Melbourne

Price: Inclusive for all full registration delegates

Additional tickets are \$80 per person, see registration form for details

Dress: Business or business casual

Day 2 Friday, 20 March 2026

Time *AEDT	Session						
9:00-10:00am	Session 7: How to practically implement Al in your firm						
	Speaker: Adrian Cartland, Cartland Law						
	Adrian has been practising tax for 20 years and building legal Al for 10 years. This session will show you how you can readily implement the Al systems he uses in his own tax practice. This session draws on real-world systems and workflows to show how Al can be deployed effectively, securely, and profitably in a professional services environment.						
	This session will cover:						
	 How to build your own Retrieval Augmented Generation system that consistently produces work above the level of base models and eliminates hallucinations; How I used AI to complete four years of accounts for 30 entities in a matter of weeks; Managing privacy, privilege, and "shadow AI" use in your firm to ensure compliance while fostering safe innovation; How to teach your staff to use AI effectively and why "play" is an important element to incorporate into firm culture; and 						
	 Why most Al implementations are failing and how to get widespread adoption and use in your firm. Attendees will leave with clear, practical steps to implement Al in their own firms, improving productivity and maintaining compliance with professional and ethical standards. 						
10:00-10:30am	Morning tea						
	SME Stream	Hot Topic Stream					
10:30-11:30am	Session 8A: Superannuation update Speaker: Liz Westover, FTI, Deloitte	Session 8B: Is my registration in danger of being suspended or terminated? Speaker: Christian Febbraro, FTI, Piper Alderman					
	Superannuation continues to evolve at pace, making it as critical as ever for advisers to keep up to date with all changes, to competently assist their clients.	What exactly are the investigatory powers of the Tax Practitioners Board? What has been their recent focus, and how can you best protect your registration?					
	In this session Liz will provide a practical and concise update on recent and proposed legislative changes, ATO priorities and focus, as well as other changes relevant for super and SMSF advisers. She will equip delegates with insights to enable them to help clients make informed, strategic decisions on their superannuation savings. Attendees will leave with actionable strategies	This highly relevant session will examine key provisions of the Tax Agent Services Act 2009 (Cth) and the actions the Tax Practitioners Board can take where the Code of Professional Conduct has been breached. It will also review the new Code items and Determination that came into effect for all registered practitioners on 1 July 2025.					
	and a sharper understanding of how to navigate the shifting superannuation environment with confidence and precision	Recent guidance from the Board and relevant case law will highlight key considerations and practical steps that tax practitioners should apply in their					

Day 2 Friday, 20 March 2026 continued

Time *AEDT	SME Stream	Hot Topic Stream		
11:30am-12:30pm	Session 9A: Employee incentive schemes Speaker: Shaun Cartoon, FTI, Arnold Bloch Leibler	Session 9B: Economic update Speaker: Dr Brendan Rynn, KPMG		
	 How does the Australian tax system support those who are willing to forgo a salary and earn sweat equity under an employee incentive scheme? This session will: Provide a brief overview of employee share schemes under Division 83A; Explore some of the features of other plans in the market that don't necessarily fall under Division 83A; and Consider some of the traps and pitfalls of those other plans, including under regimes such as FBT and Division 7A. (Disputes) or superannuation topic. 	This session provides a comprehensive economic update, examining the key tre challenges, and developments shaping Australia's economic landscape. It will confectors such as growth, inflation, interest rates, and global influences, and exploit their implications for businesses and practitioners. The session will offer insight into the current economic environment and provide a forward-looking perspect to help attendees understand emerging opportunities and risks.		
12:30-1:30pm	Lunch			
1:30-2:30pm	Session 10A: Taxing earnouts – Navigating the patchwork quilt Speaker: Karen Goodfellow, CTA, Goodfellow Tax Advisory	Session 10B: I only engage contractors – Why do I have a payroll tax assessment? Speaker: Elissa Romanin, MinterEllison		
	Earnouts can be a useful commercial device in M&A transactions to 'bridge the gap' in reaching agreement on the appropriate amount payable for a business. While they may be helpful from a deal-making perspective, ascertaining the tax consequences of earnout arrangements can be complex and, depending on how the arrangement is designed, fraught with uncertainty.	A deep dive into all thing's Payroll Tax, including the regulator's position on doctors' clinics and the new amnesties and rulings being released. A summary of what the Uber decision means for all industries, especially for those who heavily rely on the traditional contractors to carry out its activities and whether the employee vs contractor test administrated by the state regulators is the same at the test applied in an employment law context.		
	This session will unpack the tax treatment of earnouts from both the vendor's and purchaser's perspectives. It will cover:			
	 The different types of earnouts; The tax treatment of 'look-through earnout rights' under Subdivision 118-I of the Income Tax Assessment Act 1997 (Cth), including how the small business CGT concession regime deals with those rights. 			
	 The uncertainties surrounding the tax treatment of earnout rights not captured by Subdivision 118-1; and Tips from a drafting perspective to minimise uncertainty. 			

Day 2 Friday, 20 March 2026 continued

Time *AEDT	SME Stream	Hot Topic Stream
2:30-3:00pm	Afternoon tea	
3:00-4:00pm	Session 11A: Family trust elections – Intergenerational wealth transfer and succession planning Speaker: Scott Luetjens, ATI, Deloitte This session will clarify family trust elections (FTEs) in today's succession wave – what they are, why they matter, and how rising ATO scrutiny (including FTDT and s 100A) is reshaping risk and strategy. The session will: Translate the rules into practical, succession-ready steps as control and wealth pass between generations; Explain when, why (and how) to make or refresh an FTE – choosing the test individual, mapping the family group, process requirements, and variation windows; Outline what the ATO is focusing on – FTDT exposures, interposed entity elections, trust deeds and variations (including resettlement risk), loss tracing and franking credits, and distribution patterns in current target areas; Highlight issues and fixes seen in reviews, with practical examples; and	Session 11B: State tax considerations for corporate restructures Speaker: Kristina Popova, Grant Thornton This session will explore key state tax considerations, with a particular focus on their importance in corporate restructures. It will examine how state taxes, such as stamp duty and payroll tax, can impact the structuring and execution of corporate transactions, and highlight strategies to manage and mitigate these liabilities. Attendees will gain practical insights into compliance requirements, recent developments, and planning opportunities to ensure state tax issues are addressed efficiently during restructures.



Day 2 Friday, 20 March 2026 continued

Time *AEDT	SME Stream	Hot Topic Stream
4:00 - 5:00pm	Session 12A: Tax residency for individuals – The tests, recent cases and practical tips Speaker: Michael van Schaik, LZR Determining whether an individual is an Australian tax resident can be one of the most complex and contentious areas of tax law. With global mobility on the rise, questions of when a person ceases or commences residency have become increasingly significant, especially given the wide-ranging tax consequences that flow from a change in status. This session will explore the current law on individual tax residency, the implications of changing residency, and recent case law in this space. It will cover: The statutory tests for individual residency under section 6(1) of the <i>Income Tax Assessment Act 1936</i> (Cth) and key interpretive principles; The consequences of changing residency; Insights from recent cases, including <i>Quy and Commissioner of Taxation</i> [2025] ARTA 174, <i>Kirtlan and Commissioner of Taxation</i> [2025] ARTA 539, and <i>Abotomey v Commissioner of Taxation (Taxation and Business)</i> [2025] ARTA 719; and Practical tips for advisers on managing risk and navigating disputes over residency.	Session 12B: The ATO's debt approach – What can you do for your clients? Speakers: Anna Longley, Australian Taxation Office, Tuan Van Le, Challenger Law The ATO's firmer approach to debt continues in 2026. What is the strategy behind this, and how will it impact your clients? This session is designed to gain insights into the ATO's much discussed firmer position on debt, understand the tools it is using to assist in the debt recovery process, and showcase the support options available for taxpayers. The session will also provide the view from the "flip side" – the practical tips and traps from a practitioner about the issues that arise when dealing with the ATO, including when disputing a debt.
5:00pm	Forum close	



Julie Abdalla, FTI, is the Head of Tax & Legal at The Tax Institute, Julie has practiced in the corporate tax teams of Big 4 and top tier law firms in Sydney and Melbourne. She has expertise in law and policy across a broad range of taxes and industry sectors. Prior to joining The Tax Institute, Julie gained experience across the spectrum of UK taxes while working at an international law firm in London. 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 represents The Tax Institutes in several external forums including the ATO's National Tax Liaison Group and the Australian Treasury's Tax Treaty Advisory Panel, 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.

Adrian "the Taxinator" Cartland has practiced for nearly 20 years, working at a number of tax law roles in top tier firms as well as boutique tax practices, meeting his billable targets on at least a few occasions. About ten years ago he began thinking about the future of law and developed an interest in legal Artificial Intelligence, mostly in an effort to find a robot to do the work he was too lazy to do. Deciding that it was

best to pursue this expensive and time consuming hobby (er, business) while not on someone else's timesheet he founded his own firm Cartland Law, and is now unemployable. Because Adrian knows very little about other, more normal, areas of law, Cartland Law specialises in and only accepts instruction in tax, trusts and technology. Coming from a family of engineers who have constructed many things beneficial to society, Adrian has instead created a number of tax and trust structures that are so complex no-one really knows what they do. He has also created Ailira, the Artificially Intelligent Legal Information Research Assistant and partly contributed to the doom of humanity by Al. He is the Chair of the Society of Trust and Estate Practitioners SA, the TTI's State Taxes Committee, was Australia's funniest lawyer in 2007 and holds the Australian record for fastest MMA knockout at 6 seconds.

Shaun Cartoon, FTI, is a partner in Arnold Bloch Leibler's tax practice. He advises a range of clients, including ultra-high-networth individuals, ASX listed companies and large private groups. Shaun's practice includes a specialty advising on ATO audits and disputes, taxation of offshore assets and structures, issues and disputes concerning tax residency and asset protection.

Michael Clough, FTI, is a Partner at King & Wood Mallesons and has over 40 years experience advising Australian and foreign-owned clients on tax issues which arise in the capital and debt markets, corporate transactions and resources and infrastructure sectors. On behalf of his clients, Michael has helped resolve many disputes with the ATO and also conducted numerous tax appeals and other related proceedings in the state, Federal and High courts and tribunals.

Enzo Coia, CTA, is a Tax Partner at KPMG with more than 25 years experience advising on Australian tax matters associated with mergers and acquisitions. Enzo has significant expertise in advising clients in energy and resources. Enzo has advised on many significant transactions in power and utilities including renewable energy, mining and the oil and gas sectors. Enzo is a frequent presenter to industry bodies and has published many articles on mergers and acquisitions.

Leanne Connor, CTA, is a Director of WGC Business Advisors, a chartered accountancy firm specialising in taxation and strategic advice to SMEs and high net worth individuals. Leanne has over 30 years experience providing accounting, business advisory, strategic superannuation and taxation services. Leanne's areas of expertise include tax

and superannuation planning, business restructuring and understanding the fundamental issues relating to SMSFs, family trusts and private companies.

Leanne is a Director and National Council member of The Tax Institute and past chair of its Victorian State Council & PD Committee. She is a regular presenter for The Tax Institute and winner of the 2020 SME Tax Adviser of the Year Award.

Adam Dimac is a Partner in the Hall & Wilcox Tax Team. He has extensive experience in assisting clients with tax reviews, audit, objections and litigation. Adam also advises clients on a range matters including Division 7A, CGT, corporate restructuring, professional firm structures, trust taxation, superannuation and blockchain/cryptocurrency taxation. His clients include professional firms, small-to-medium enterprises, high-net-worth individuals and family groups.

Christian Febbraro, FTI, is a Senior Associate at Piper Alderman specialising in tax disputes. Christian was previously employed at the Australian Taxation Office, Tax Practitioners Board and Deloitte. During his time at the regulators, Christian often appeared on their behalf in the Courts and Tribunals. Christian brings that knowledge in the advice and assistance he provides his clients, which

are mostly in the SME space. Christian is an admitted lawyer in both the Supreme Court of Victoria and the High Court of Australia. In addition, Christian is a Chartered Accountant, a Fellow with the Tax Institute and has recently completed a Master of Laws at the University of Melbourne specialising in taxation. Christian is part of the Tax Institute's Next Generation committee.

Karen Goodfellow, CTA, is the owner and principal of Goodfellow Tax Advisory Pty Ltd, providing specialist tax consulting services and training to accountants, lawyers and other advisors to SMEs and family groups. She is an experienced tax professional with extensive experience in the tax advising and education (CPD/ CPE) space. As the founder and operator of two successful tax training businesses, Karen has detailed knowledge of Australia's federal tax system. Karen's extensive experience providing tax advice and training gives her an excellent understanding of the most pressing issues facing tax practitioners such as CGT roll-overs, the small business CGT concessions, the CGT main residence exemption, taxation of trusts and taxation of companies.

Rhys Jewell, CTA, is a Partner in the Tax and Tax Controversy practice group at Corrs Chambers Westgarth and has

over 25 years experience advising on the tax aspects of public and private mergers and acquisitions for large domestic and multinational clients. He has extensive experience in tax due diligence (buy-side and sell-side), tax structuring, documentation and postimplementation projects across all asset classes. He has particular experience in advising on inbound investment into Australia. Rhys has lead engagement with the Australian Taxation Office on a variety of issues associated with mergers and acquisitions, including in respect of private rulings and class rulings on capital management matters.

John Kehoe writes from Parliament House, Canberra on economics and the intersection of politics and business. He appears regularly on Nine's Today Show to talk finance news. Between 2013 and 2018, John was the Financial Review's US Correspondent in Washington. He reported on the Obama presidency and the rise of Donald Trump during the presidential election and the first 18 months of the Trump presidency. John ioined the Financial Review in 2008 and has reported on banking, tax and federal politics. Before entering journalism, John began his career as an economic analyst at the Australian Treasury. He studied economics and politics at Monash University in Melbourne

Anna Longley is Deputy Commissioner, Frontline Risk and Strategy. In this role, Anna is responsible for setting strategic direction for the Frontline Operations group, particularly on registration, lodgement and payment, and managing external stakeholder engagement. Previously, Anna has worked on lodgement and enforcement strategies, providing recommendations on the ATO's strategy for ensuring timely lodgement of taxation obligations, and tailored strategies for enforcing high risk debts, and in a number of Assistant Commissioner roles in the Private Wealth business line, across Behaviours of Concern, Engagement and Assurance, and Technical Advice and Guidance. From 2019 until 2023, Anna was Assistant Commissioner General Counsel at the Australian Charities and Not-for-profits Commission. In that role, Anna was the senior legal adviser to the ACNC Commissioner, was a member of the ACNC Executive and Performance, Audit and Risk Committee, and had operational leadership of the ACNC. Anna also has significant experience in administrative law, dispute resolution and litigation.

Scott Luetjens, ATI, is a Partner at Deloitte Private and predominantly advises privately controlled groups and wealthy families on complex income tax matters, with a particular focus on significant transactions, tax controversy, alternative dispute resolution, and engagement with the ATO. He works closely with other subject matter experts within Deloitte, including succession planning specialists, to assist clients with structuring and tax advice.

Archana Manapakkam, FTI, is a Special Counsel in the tax practice at Velocity Legal. Archana acts for privately owned businesses, high net worth individual and family groups with interests in a wide range of sectors. In addition to broad experience in tax advisory and disputes, Archana has niche expertise in the tax aspects of estate planning and estate administration. Archana is an active member of The Tax Institute ('TTI') and the Society of Trust and Estate Practitioners ('STEP'). Her articles have been published in 'Taxation in Australia' and 'The Tax Specialist', and she has presented at conferences and seminars held by TTI, STEP and CPA Australia (among others). Archana is also a member of the STEP Australia Policy & Advocacy Committee. Archana holds a combined Bachelor of Laws and Bachelor of Commerce (Finance) degree from Monash University, a Master of Laws (Taxation) from the University of Melbourne and a Graduate Diploma in Applied Law (Estate Planning) from the College of Law. Archana was awarded the Frank Pinkerton Scholarship at the University of Melbourne.

Emily L Marsden is a Director and Lawyer within EY's Tax Policy & Controversy Practice. In this role, she provides technical and strategic assistance in relation to ATO enquiries. This includes advising taxpayers on their rights under audit, disputes, tax office investigations, legal professional privilege, administrative concessions, dispute resolution, penalties and interest. Emily specialises in mitigating tax risk within an organisation. This includes drafting and implementing tax risk policies, updating existing policies (to reflect law changes), training organisations on tax risk management. tax controls testing and advising on ATO enquiries about tax governance. Emily also assists Boards understand their obligations for tax governance.

Narelle McBride, CTA, is a Partner at PwC with over 25 years' experience advising some of Australia's largest corporate and privately owned enterprises, comprising varying business structures such as companies, trusts, partnerships and joint ventures. Her clients conduct business across many sectors including retail, property, primary industries and energy and resources. Narelle advises on general income tax matters as well as Australian tax issues associated with restructures, acquisitions and divestments. This extends to planning, due diligence and managing ATO interactions, reviews and

disputes. She also advises on internal and external restructures involving debt financing arrangements, rehabilitation projects and closure projects.

Joseph Phan is a Partner at PKF
Australia, specialising in corporate and international tax. He has over 15 years of experience advising large corporates, SMEs and private groups on a broad range of Australian tax issues and strategic tax planning, including inbound and outbound investments, M&A transactions, and corporate restructures. Joseph's expertise also extends to assisting clients with ATO compliance engagements including audits and reviews, private rulings and developing tax governance frameworks and documentation.

Adam Pritchard is an Assistant
Commissioner in Public Groups. He
leads the Top 1000 Program, responsible
for delivering the assurance reviews
and ensuring consistent engagement
with large businesses. Adam brings
experience from both public and private
sectors, and across corporate and
indirect tax. He holds a combined Law
and Commerce degree from Australian
National University and has completed
the Chartered Accountants Program and
Practical Legal Training.

Kristina Popova is a Partner in Grant Thornton's State Taxes practice. Kristina is experienced with advising clients operating across a diverse range of industries and specialises in stamp duty, land tax and various other state and territory imposts, including foreign owner surcharges, across all Australian jurisdictions. Kristina is admitted as a lawyer in the Victorian Supreme Court and has advised and acted on indirect tax disputes in the Supreme Court of Victoria, the Federal Court of Australia, the Victoria Civil and Administrative Tribunal and the NSW Civil and Administrative Tribunal. Kristina is also a member of TTI's Victorian State Taxes Committee.

Elissa Romanin is a Partner in the MinterEllison tax practice, specialising in providing tax structuring, tax due diligence, contract drafting and general income and employment tax advice. Many of the matters Elissa work on involve corporate income tax issues related to mergers and acquisitions. divestments and capital reorganisations. Elissa's clients benefit from her ability to connect various tax aspects in her matters including in relation to transactions, mergers and acquisitions and tax risk management strategies. In addition to large corporates, her clients include high net wealth individuals and privately owned groups in Australia and abroad. She works with these clients to help structure their wealth ownership

in a way that tax-effectively achieves their succession planning and asset protection objectives. Elissa Romanin is a Partner in the MinterEllison tax practice, specialising in providing tax structuring, tax due diligence, contract drafting and general income and employment tax advice. Many of the matters Elissa work on involve corporate income tax issues related to mergers and acquisitions. divestments and capital reorganisations. Elissa's clients benefit from her ability to connect various tax aspects in her matters including in relation to transactions, mergers and acquisitions and tax risk management strategies. In addition to large corporates, her clients include high net wealth individuals and privately owned groups in Australia and abroad. She works with these clients to help structure their wealth ownership in a way that tax-effectively achieves their succession planning and asset protection objectives.

Dr Brendan Rynne is Chief Economist for KPMG Australia and is lead partner for KPMG's Economics practice. He is also an Adjunct Professor at Queen Mary University of London in the School of Economics and Finance, and is an Advisory Board member of the Melbourne Institute of Applied Economic and Social Research at the University of Melbourne. Brendan has significant experience in

advising public sector departments and agencies on a range of issues and activities, including econometric analysis, economy-wide modelling, cost benefit analysis, impact assessments, efficiency improvements, and legislative/regulatory reform. Brendan regularly assesses existing policies and provides economic analysis to inform key decision-makers about the impacts of potential policy interventions

Daniel Smedley, CTA, enjoys solving complex taxation and trust law issues for private enterprise clients. He is also a trusted confidant in planning then succession of his client's personal and business affairs. Daniel is a Chartered Tax Advisor with The Tax Institute, accredited as a specialist in Taxation Law with the Law Institute of Victoria and is recognised by his peers in Doyles Guide as a leading lawyer in Taxation. He is also recognised in respect of tax law in the Best Lawyers list published in the Australian Financial Review. Daniel is a regular presenter at state and national industry conventions, conferences and workshops.

Dr Niv Tadmore, CTA, has 25 years' experience advising national and international clients on the conduct and resolution of tax audits, tax disputes, and large-scale transactions. He advises global and Australian

corporations operating in diverse industries including financial services. digital and tech, energy and resources, IT infrastructure, life sciences and pharmaceuticals, aviation, shipping, and consumer products. Niv is president of the Australian Branch of the International Fiscal Association (IFA) and was the founding chair of the global IFA Supervisory Board, Niv has also served as a member of key ATO groups, including Dispute Resolution, Large Business Stewardship, and Advance Pricing Agreement. He has served as a member of Australian Federal Treasury working groups, including BEPS I and II. He is a member of the Melbourne University Tax Advisory Board and the New York University International Tax Program Practice Council.

Nathan Unitt is a Senior Associate at Corrs Chambers Westgarth in the Tax and Tax Controversy practice group.

Nathan advises across a wide range of tax issues involving multinational, public and large private groups including within the superannuation, infrastructure, mining, shipping, finance, private equity, property development and notfor-profit sectors. Nathan has a deep understanding of tax laws, legislative developments and ATO processes, gained from more than a decade of experience in advising clients at the Big 4, designing

new tax laws at the Commonwealth Treasury and leading tax counsel and foreign investment teams at the ATO. He provides comprehensive advice on tax matters, including the ATO's approach to clients' arrangements and how to best respond.

Michael van Schaik is an Associate
Director at LZR Partners. He has over
25 years of expertise in specialist
expertise in the area of International
Mobility, having worked both in Australia
and the United Kingdom. During this
time, He worked with clients in a
multitude of industries to advise on
the taxation implications that arise
from employees living and working
outside their home countries including
tax effective remuneration packages,
superannuation, pension and termination
payments and share schemes.

Tuan Van Le has over 18 years of experience in tax debt recovery and tax litigation including a role as the Executive Director of the ATO's Legal Services Branch (now known as ATO Litigation and Legal Services) where he managed the ATO's litigation department in Victoria and Tasmania. Together with the ATO Debt business line, Tuan led the litigation strategy for many of the ATO's highest risk and high-profile debt recovery cases, including Project

Wickenby and Operation Rubix. Prior to establishing Challenger Law, Tuan was appointed a Judicial Registrar and the Appeals Registrar of the Federal Court of Australia, the National Coordinating Registrar for the Taxation National Practice Area and the Secretariat of the Judges' National Practice Committee. Tuan has been recognised as a recommended "Leading Tax Lawyer" in Victoria in the 2025 edition of Doyle's Guide, in the 2023, 2024, 2025 and 2026 editions of The Best Lawyers in Australia for Tax Law & Litigation, the 2023 and 2024 editions of the Legal 500 for Dispute Resolution: Litigation, and the 2023 and 2024 editions of Who's Who Legal in corporate tax. Tuan is a senior fellow at Melbourne Law School and is also a member of the Tax Committee of the Law Council of Australia and its representative on the ATO Private Groups Stewardship Group.

Eugene Wheelahan KC, FTI, practices principally in tax law. He has appeared for both taxpayers and the Commissioner of Taxation in leading cases in the High Court and Federal Court, including, most recently, the Minerva, Mylan, Ausnet and PepsiCo cases. Eugene has a Master of Tax from the University of Melbourne where he is a Senior Fellow of the Law Faculty, lecturing in the subject Tax Litigation.

Liz Westover, FTI, is a Partner and National SMSF Leader at Deloitte. She is responsible for the firm's SMSF service offering, providing compliance and advisory services to the firm's clients. Liz has extensive experience in superannuation and has strong capabilities on the technical and practical application of superannuation and associated tax laws. She is a regular commentator on superannuation and self-managed super funds (SMSFs) having presented and authored articles on these and related issues for many years. Liz has been involved in superannuation policy development and advocacy, regularly liaising and consulting with Government, regulators and stakeholders on technical, legislative and policy matters. She is a Fellow of The Tax Institute, Fellow Chartered Accountant, CA SMSF specialist and holds a Master of Legal Studies from the University of New South Wales and a Bachelor of Business from the University of South Australia.

Chris Wookey, CTA (Life) operates his own specialist tax consulting practice after previously having been a principal in the tax consulting division of Deloitte Private in Melbourne. A finalist in The Tax Institute's Tax Adviser of the Year Awards for 2020 and 2022 and made a life member of The Tax Institute

in September 2023, he has over 30 years' experience in the chartered accounting profession and is a member of The Tax Institute's national SME Technical Committee and had been its representative on the ATO's Private Groups Stewardship Group from 2021 to 2022. Chris was also a member of the Board of Taxation's Reference Group for its Review of Small Business Tax Concessions. His experience, centred on issues encountered by private groups, includes providing input to Treasury in relation to the proposed targeted amendments to the Div 7A integrity rules and participating in confidential consultations with the ATO in relation to the 2022 and 2023 developments in relation to section 100A.

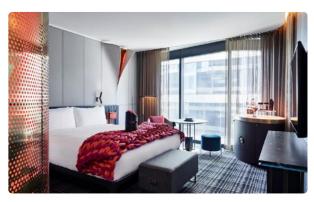
Nick Wookey is an Associate in our Tax & Structuring team, advising SMEs and family businesses on trusts, tax, asset protection, and commercial law matters. He helps clients navigate complex trust deeds, taxation disputes, business restructures, and M&A arrangements, delivering practical and commercially sound solutions.



Venue and accommodation







W Melbourne

408 Flinders Lane, Melbourne, Victoria 3000

Melbourne's first luxury lifestyle hotel with its rebellious Flinders Lane address, W Melbourne takes its design cues from the streets of Australia's cultural capital. We hold the back-lane entrance keys to what's New/Next in the city, revealing a playground where the early risers to the late-night revellers can turn up the tracks in this dynamic city. The joy of discovery is what underpins the design narrative at W Melbourne. Each space exhibits its own personality as the rawness of industry gives way to elegance and an array of sensory triggers that reveal unexpected delights.

Getting there

W Melbourne is approximately 10 minutes' walk from both Flinders Street and Southern Cross railway Station.

Parking

To guarantee your parking space ahead of arrival, a valet fee of \$100 per day applies. Guests who prefer to arrange parking on the day may do so, subject to availability, at \$80 per day. Please note that choosing not to secure parking in advance means availability cannot be guaranteed.

Electric vehicle chargers are also available for \$45 per day.

Subject to availability - Same Day Parking is limited and offered on a first-come, first-served basis. The maximum vehicle height allowed is 2.2 metres.

Secure parking

522 Flinders Lane – Open 7 days. For more information on availability and rates <u>click here</u>. 300 Flinders Street – Open 7 days For more information on availability and rates <u>click here</u>.

Accommodation

Favourable room rates have been negotiated and secured at W Melbourne. Accommodation bookings can be made by following the link <u>here</u>.

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

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 event counts for 12 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

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

Delegate list

A delegate list will be included on the attendee hub to assist with networking. Please indicate at the time of registration if you do not want your name to be in-cluded. 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

Networking reception

The forum's Networking reception will be held directly following the last session on Thursday, 19 March, from 5.00pm at W Melbourne. The Networking reception is included in the full 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. The Tax Institute cannot accept responsibility for delegates' late transport arrivals or non-arrivals due to delays.

Privacy

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

Enquiries

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

For registration enquiries, please contact <u>customeradmin@taxinstitute.com.au</u>.

Registration

Registration inclusions

	Online access to presenta-tions and technical papers	Morning/ Afternoon tea/lunches	Networking reception*
Full registration This registration option entitles one delegate to attend the entire event.	<i>\(\lambda \)</i>	//	//
Employer registration This registration option allows one registration to be shared between multiple attendees from the same firm.	#	//	//

^{*}Additional tickets to the Networking reception can be purchased on the registration form.

Discounts

Early bird registration

All registrations received and paid on or before Friday, 20 February 2026 will be entitled to an early bird discount.

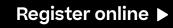
Please note: The registration fee does not include accommodation, hotel incidentals or transfers.

Group discounts

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

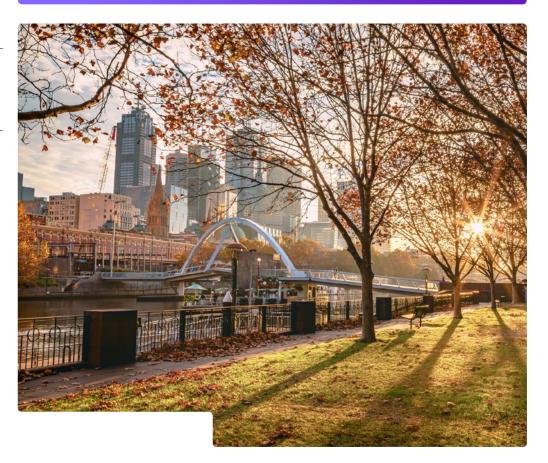
This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together. For further information please contact the national events team on 1300 829 338 or national events@taxinstitute.com.au.

Register now!





included in this brochure





VIC Tax Forum Registration form

44829 WD

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		2 Delegate contact details		
Please see page 20 for registration inclusions. Full registration - 12 CPD hours			Member no.:	
	Member	New member*	Non-member	If your member details are up-to-date, you can skip this section.
Early bird registration Register on or before Friday, 20 February 2026	S1,695	S2,090	\$1,995	Title: Mr Mrs Miss Ms Date of birth: DD/MM/YYYY
Standard registration Register after Friday, 20 February 2026	S1,895	\$2,290	\$2,195	First name:
☐ I understand that the registration fees do not in	clude printed materials	. Access to materials	s will be electronic.	Last name:
Networking reception The Networking reception is INCLUDED in the registration fee for delegates attending the full event. Thursday, 19 March 2026 at W Melbourne Yes, I WILL be attending the Networking reception OR No, I WILL NOT be attending the Networking reception Yes, I require additional tickets for the Networking reception at \$80 per person No. x tickets at \$80 each: Dietary requirements:			Position: Company: Address: Suburb: Telephone: Email:	
				*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 \$230 on Affiliate membership on the first 12 months 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:

- access member-only prices to this and future

- access all member-only technical resources.

Find out more about membership at taxinstitute.com.au/membership

Date of signature:

3 Payment summary

Transfer costs are non-refundable and non-transferable.

	_	
Registration fees	\$	
Additional guest tickets – Networking reception (\$80 each)	\$	
Total payable	\$	

Please note: The Tax Institute cannot accept responsibility for delegates' late flight arrivals.

4 Pa	yment	method
------	-------	--------

Ch	hla 4a Tha Tau laatit				
_ Cneque paya	ble to The Tax Instit	ute (in Australian i	dollars)		
Credit card	Card type: 🔲 A	MEX 🗌 Visa	MasterCard	Diners	
Name on card:					
					MM/VV
Card no.:				Expiry date:	IVIIVI/ I I
]	
Cardholder's					
signature:					

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

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

To register

Email customeradmin@taxinstitute.com.au

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au



VIC Tax Forum Employer Ticket

Registration Form

44829 WD

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				2 Delegate contact details								
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.			Member no.:				If your member details are up-to-date, you can skip this secti					
	Classic	Plus	Premium	Tailored	Title:	☐ Mr	☐ Mrs ☐ M	iss 🗌 Ms	Date of bi	irth: 🗀	DD/MM/YYY)	
Early bird on or before Friday, 20 February	\$3,450	\$4,950	\$6,450		First name:							
Standard after Friday, 20 February	\$3,650	\$5,150	\$6,650		Last name:							
Best for	SME	Mid-Tier	Corporate	Large/National	Position:							
Flexibility	Your choice of 20 sessions	Your choice of 40 sessions	Your choice of 60 sessions	Contact us to tailor a quote	Company:							
Team attendance	Up to 5 attendees	Up to 10 attendees	Up to 15 attendees	today for you and your team	Address:							
Session formats	Face-to-face	Face-to-face	Face-to-face	to attend	Suburb:				State:		Postcode:	
Networking	5 networking passes	10 networking passes	15 networking passes	multiple events.	Telephone:				Mobile:		Tostcode.	
All Employer Ticket attendee - Electronic access to downloo - Morning tea, lunch and after - CPD hours allocated accordi	ad available technical noon tea	papers and present			Email: Please tick Payme		,	your name to be	included on the dele	egate list p	rovided to all attendees	for networki
- Coordinators will be contact on the Employer Ticket type		ction form to compl	ete on behalf of atte	endees, based			gistration paymer ne Tax Institute.	nts must be m	ade prior to the e	vent, unl	less other arrangem	ents have
- The session selection form r	nust be completed in	full to ensure proper	allocation of CPD h	ours post-event.	Cheque p	ayab	le to The Tax Ins	t itute (in Austral	ian dollars)			
1 Employer Ticket typ	oes	Promotio	nal code:		Credit ca	rd	Card type:	AMEX U	isa 🗌 Master(Card _	Diners	
Ticket type	Cost	No. of tic	rets	Sub-total	Name on care	d:						
Classic					Cardna						Funing data	MM/Y
Plus					Card no.:						Expiry date:	

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

Premium

Email customeradmin@taxinstitute.com.au

Total payable \$

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Cardholder's

signature:

Online taxinstitute.com.au

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



Join the conversation

- in linkedin.com/school/the-tax-institute
- facebook.com/thetaxinstitute
- x twitter.com/taxinstituteoz
- instagram.com/thetaxinstitute_

taxinstitute.com.au

