

Financial Services Taxation Conference

14–15 March 2024

Crown Sydney

11 CPD hours



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

Matt Osmond, CTA, PwC (Chair, Financial Services Taxation Conference Organising Committee)

Michael Anderson, BDO

Siew-Kee Chen, CTA, Deloitte

Andrew Collignon, CTA

Nitin Gulati, Australian Taxation Office

Simon Jenner, CTA, EY

Jason King, CTA, JGK Consulting

Peter Nearhos, CTA, QIC

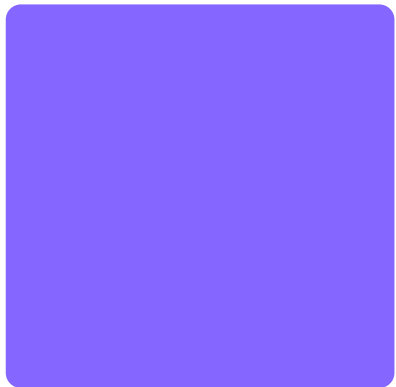
Sarah Pang, FTI, IAG Insurance

Natalie Raju, KPMG

Nicole Stratford, Barrenjoey

Steve Whittington, Ashurst

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Welcome

On behalf of The Tax Institute and the Organising Committee, it gives me great pleasure to invite you to attend the 2024 Financial Services Taxation Conference.

The Tax Institute's Financial Services Taxation Conference continues to be the leading conference for financial services taxation professionals in Australia.

The 2024 Financial Services Taxation Conference is being held at the Crown in Sydney from 14-15 March 2024 and will be an in-person event.

The past 12 months have presented further changes and challenges in the Australian and the global economy and the tax landscape. We have seen further cost of living pressures and multiple increases in the cash rate. ESG, energy transition, reconciliation and governance remain a focus of boards and topics of conversation. Conflict in Europe and the Middle East present economic uncertainty. Wage growth remains subdued and future employment levels are uncertain. The government has continued its focus on multinational tax measures and franking credits are once again being targeted.

This is a great platform to present another broad selection of experts and presenters from policy-makers, economists, barristers, corporate tax professionals, tax lawyers and accountants to bring a diverse range of insights and perspectives and focus on recent developments and current policy issues. The program is designed to deliver a choice of sessions to best meet your needs.

There will also be many opportunities to meet other financial services taxation professionals and re-connect with friends and colleagues.

I look forward to seeing you at the Crown in Sydney in March 2024.



Matt Osmond, CTA
Chair, Conference Organising Committee

Early bird pricing offer
Register on or before Friday, 16 February 2024 to save!

Technical program

Day 1 Thursday, 14 March 2024

Time AEDT	Session
8:30 – 9:00am	Registration
9:00 – 9:30am	Welcome and opening address Speaker: Matt Osmond, CTA, PwC
9:30 – 10:30am	Session 1: Keynote address The Hon Allegra Spender MP
10:30 – 11:00am	Morning tea
11:00am – 12:00pm	<p>Session 2: Thin capitalisation Speakers: Ryan Kinsella, Deloitte, Shahzeb Panhwar, PwC</p> <p>The Treasury Laws Amendment (Making Multinationals Pay Their Fair Share – Integrity and Transparency) Bill 2023 (the Bill) containing amendments to Australian thin capitalisation rules in Division 820 was tabled in Parliament on 22 June 2023. Following the release of a findings report with recommendations of the Senate Economics Legislation Committee, a further exposure draft was released in October 2023 containing technical amendments to the Bill so as to “ensure the new thin capitalisation rules are appropriately targeted”.</p> <p>The thin capitalisation amendments can have a significant impact on multinational groups operating in Australia, including entities in the financial services industry.</p> <p>This session will explore the latest state of play, with a focus on:</p> <ul style="list-style-type: none">• Impact of the amendments on financial entities• The new interest limitation rules, examples and practical considerations for general class investors including those that provide financial services (e.g., insurance companies, fund managers); and• How to approach the debt deduction creation rules.

Technical program

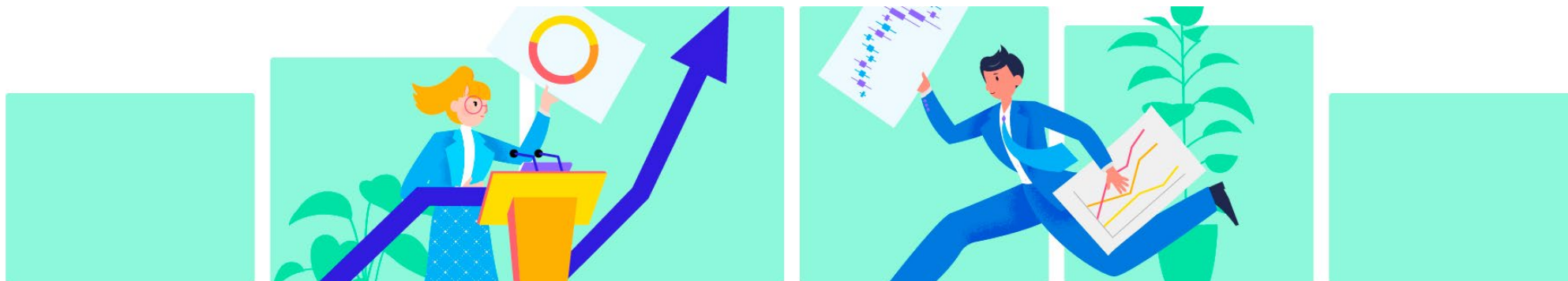
Day 1 Thursday, 14 March 2024 continued

Time AEDT	Session
12:00–1:00pm	<p>Session 3A: Banking, non-bank lending and insurance update Speakers: James Campbell, Australian Taxation Office, Remali Vilathgamuwa, CTA, EY</p> <p>This session will provide a corporate tax update relevant to the banking, non-bank lending and insurance sectors including:</p> <ul style="list-style-type: none"> • Latest on ATO Justified Trust and Specific Reviews • ATO approach to hybrid mismatch rule compliance • Managing thin capitalisation asset attribution issues • Dealing effectively with transition out of the OBU regime; and • Practical issues with the amendment of Division 321.
	<p>Session 3B: Wealth management update Speakers: Blake Sly, Australian Taxation Office, Wendy Tse, Magellan Asset Management Facilitator: Natalie Raju, KPMG</p> <p>This session will provide a tax update relevant to fund managers and superannuation funds including:</p> <ul style="list-style-type: none"> • AMIT issues • Changing custodians • Tax reporting and governance • ATO industry strategy; and • ATO Combined Assurance program.
1:00–2:00pm	Lunch
2:00–3:00pm	<p>Session 4A: Foreign hybrids and CFC's Speakers: Bevan Grace, KPMG, Michelle Siu, Aware Super</p> <p>Investing in foreign partnerships and companies raises a number of technical, commercial and compliance issues.</p> <p>This session, through reference to relevant case studies and examples, will provide and consider:</p> <ul style="list-style-type: none"> • An overview of the foreign hybrid and CFC rules • Common investment structures • The key commercial and tax considerations • Australian and foreign compliance obligations and challenges; and • Areas for future reform.
	<p>Session 4B: M&A – Completing a deal Speaker: Scott Heezen, King & Wood Mallesons, Kaihui Chong, Liberty Global Transaction Solutions, Victoria Lanyon, King & Wood Mallesons</p> <p>Buying or selling a company involves numerous considerations, including a number of key tax matters that must be considered to successfully get the deal done.</p> <p>This session will cover key buy-side and sell-side tax considerations for completing a deal, including:</p> <ul style="list-style-type: none"> • Typical clauses in the SPA including tax indemnities and warranties & gross ups • Exiting an income tax and GST Group • Transfer of tax attributes • Dealing with intercompany balances; • Treatment of transaction costs; and • Tax Indemnity and Warranty Insurance – market trends and considerations.

Technical program

Day 1 Thursday, 14 March 2024 continued

Time AEDT	Session
3:00 – 3:30pm	Afternoon tea
3:30 – 4:30pm	<p>Session 5A: Transfer pricing and MAP Speakers: Priscilla Ratilal, ATI, Deloitte, Bill Yohana, ATI, BDO</p> <p>Transfer pricing management, compliance and governance remain key issues for taxpayers in the Australian financial services sector. This session will cover a number of key themes that impact international related party dealings and transfer pricing policies for the sector, such as:</p> <ul style="list-style-type: none">• Higher interest rates and increase in the cost of capital, and the subsequent impact on intra-group funding, internal reinsurance arrangements and other forms of risk transfer agreements• The focus on outsourced services by tax and financial regulators• Investment in technology and emerging issues related to the treatment of intangibles• Governance and transparency, including developments in the area of CbC reporting. <p>Throughout the session, we will discuss Identify and discuss the latest judicial and legislative developments, and highlight ATO areas of focus for Australian financial services entities. We will also outline the processes and potential outcomes of Mutual Agreement Procedures (MAPs), given the increased attention on transfer pricing and branch profit attribution, and consequently the risk of double taxation.</p>
	<p>Session 5B: What are the ESG considerations for tax practitioners in financial services? Speaker: Shirley Lam, KPMG</p> <p>As the energy transition continues to be a prevalent matter in today’s society, this session will look to cover the implications of investing in renewable projects including wind, solar, hydro and battery storage. Issues practice from a tax perspective will be considered, covering commonly used in structures, pitfalls and traps and common investor matters. The focus will be for both domestic and foreign investors.</p>



Technical program

Day 1 Thursday, 14 March 2024 continued

Time AEDT	Session
4:30 – 5:30pm	<p>Session 6A: Deferred tax issues in financial services Speakers: Brad Ivens, ATI, EY, Michelle Mori, EY</p> <p>With increased regulator and auditor focus on tax accounting and the role deferred taxes will play in pillar two calculations, this session will provide a refresher on the deferred tax rules and practical case studies including:</p> <ul style="list-style-type: none">• Resetting tax basis under the tax consolidation rules• The recognition criteria for tax losses including losses subject to an available fraction• Investments in associates• Share based payments• Available for sale assets• OBU transition; and• Pillar 2 considerations.
	<p>Session 6B: LPP Update Speaker: Angela Wood, CTA, Clayton Utz, Kristen Deards SC, Banco Chambers</p> <p>LPP is a common law right which allows a person to refuse to provide documents incorporating privileged communications.</p> <p>This session will provide the latest insights on LPP, including:</p> <ul style="list-style-type: none">• What is LPP• Key elements of the test for LPP• Recent case law• Managing LPP in practice e.g. auditor access to tax workpapers, foreign parents of Australian taxpayers, access to non-legal advisers in deals and restructures• How LPP may be waived• Considerations for in-house lawyers; and• Claiming the privilege in practice (ATO protocols).
5:30 – 7:30pm	Networking function



Networking function

After a full day of technical toil, we'll be inviting delegates to enjoy some delectable canapes and drinks. This is your opportunity to network and exchange ideas with colleagues, peers, and our esteemed presenters.

Date: Thursday, 14 March 2024

Time: 5:30–7:30pm

Venue: Smoke Bar, Barangaroo House

Price: Inclusive for all full registration delegates
Additional tickets are \$80 per person, see registration form for details

Dress: Business or business casual

Technical program

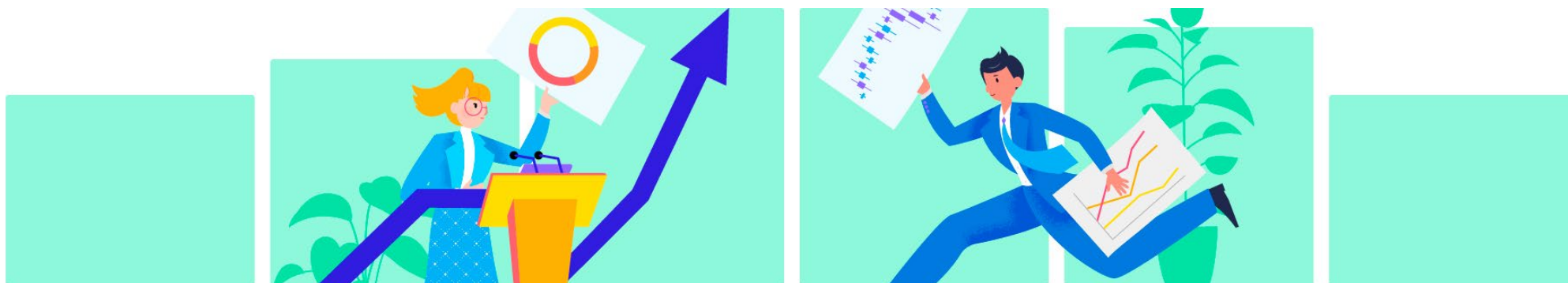
Day 2 Friday, 15 March 2024

Time AEDT	Session
8:30 – 9:30am	<p>Session 7: Economics update Speaker: Warren Hogan, Judo</p> <p>Will the Australian economy remain on the ‘narrow path’ and ensure inflation is brought down without subjecting the economy to a disruptive recessions? What will the recovery look like? Warren will address the key forces shaping the economy in FY25 and the key trends in the recovery ahead.</p>
9:30 – 10:30am	<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>Session 8A: Leasing and asset financing Speakers: Grant Harrison, PwC, Julian Humphrey, CTA, KPMG</p> <p>This session will provide a refresher and update on the tax considerations for leasing and asset financing products:</p> <ul style="list-style-type: none"> • Overview of industry • Lease vs loan (incl notional loan) • Genuine lease – common issues (IT 28, residual values) • Notional loans – common issues • Lease timing adjustments • Issues with characterisation • Funding and securitisation • Consolidation • Thin cap; and • Stamp duty and GST considerations. </div> <div style="width: 48%;"> <p>Session 8B: Pillar 2 implementation Panelists: Michael Barbour, CTA, Westpac, Robert Colquhoun, AFMA, Amelia Teng, Deloitte Facilitator: Michael Anderson, BDO</p> <p>Drawing on the detailed knowledge of our panellists, this session will provide an overview of the Pillar 2 rules, discuss the key implementation and compliance issues facing the financial services market and consider the likely impact of Pillar 2 for the Australian financial services market. In addition, the session is to cover:</p> <ul style="list-style-type: none"> • Available guidance • Inbound / outbound considerations • Overseas experience • ATO views on key issues </div> </div>
10:30 – 11:00am	Morning tea
11:00am – 12:00pm	<p>Session 9: Capital management Speaker: Julian Pinson, FTI, PwC</p> <p>Capital management is back in the spotlight and in particular the Government is seeking to limit the way Australian companies can pass franking credits to shareholders. This session will provide an update on capital management considerations and strategies, including:</p> <ul style="list-style-type: none"> • Share buy-backs for listed public companies • Frankable distributions funded by certain capital raising activity • Impact of thin cap/debt creation rules; and • Future of franking and capital management.

Technical program

Day 2 Friday, 15 March 2024 *continued*

Time AEDT	Session
12:00–1:00pm	<p>Session 10: Tax and governance Panelists: Teresa Dyson, Non-Executive Director, Alan Lee, Great Southern Bank, Sarah Pang, IAG Facilitator: Simon Jenner, CTA, EY</p> <p>This session will seek to explore different insights and perspectives on tax and governance including:</p> <ul style="list-style-type: none">• What is tax governance?• Identifying and reporting on tax risks• Dealing with global tax obligations and risks• Briefing the board• Assessing the impact of new legislation (e.g. thin capitalisation changes and Pillar 2); and• Managing relationships with tax authorities.
1:00–2:00pm	<p>Session 11: Tax cases and rulings update Speakers: Joanne Dunne, CTA, Australian Taxation Office, Steve Whittington, Ashurst</p> <p>This session will consider:</p> <ul style="list-style-type: none">• Australian tax case law which has been determined in the Federal Court, Full Federal Court and High Court in 2023, including an analysis of the win-loss percentage• Case law from other Commonwealth jurisdictions that is industry relevant and that may be persuasive in Australia; and• Recent rulings or other guidance from the Australian Taxation Office that is of significance to the financial services industry.
2:00pm	Conference close, light lunch



Presenters

Michael Anderson is a partner in the corporate and international tax team at BDO. Michael has specialist knowledge of the financial services, energy and infrastructure and healthcare sectors, with a particular focus on venture capital and growth start-ups. He provides advice on M&A transactions and corporate actions, including fund establishment, debt and equity raisings and new business ventures with a clear focus on helping clients strategically navigate the complexities of Australia's tax system. Before joining BDO, Michael was a Special Counsel at Australia's premier boutique tax firm, providing strategic advice on and the delivery of transactions for many of Australia's leading banks and other large corporates as well as venture capital funds.

Michael Barbour, CTA, is Group Head of Tax, Group Taxation for the Westpac Group. Michael is responsible for the Group's global tax management and strategy. This includes overall responsibility for tax policy, risk management and strategic issues affecting the Group, and areas such as Capital Management, Group Treasury, Mergers and Acquisitions, as well as Human Resources. Michael has been with Westpac for more than twenty years,

beginning in 1998 as Tax Controller and moving into Head of Group Tax in 2001. He also has in-depth accounting firm experience having worked with Coopers & Lybrand, Deloitte Touche Tohmatsu and Price Waterhouse. Michael also has considerable experience in dealing with domestic and global tax issues affecting the financial services sector. In particular, he engages on industry issues through the Australian Bankers' Association and directly with Federal Treasury through various consultative groups. Internationally, Michael chairs the Tax Working Group for the International Banking Federation.

James Campbell is a director, managing the Banking and Finance Strategy in the Public Groups business line of the ATO. James has 20 years experience in compliance, audit and public advice with a focus on the banking and finance industry. Areas of expertise include capital management and hybrid financing, offshore banking units (OBUs), transfer pricing, branch attribution, controlled foreign corporations (CFCs), Part IIIB and thin capitalisation. James is currently playing a leading role in the delivery of the ATO's Top 100 and Top 1,000 program in relation to the banking and finance industry.

Kaihui Chong is a senior tax underwriter on the Liberty GTS Tax Liability Insurance team, based in Singapore. Kaihui's focus is on tax risks arising across the Asia Pacific (APAC) region. At Liberty GTS, Kaihui has structured and implemented bespoke tax insurance solutions across major APAC jurisdictions, covering tax implications associated with mergers and acquisitions (M&A), restructuring and other specific tax risks. Prior to joining Liberty GTS, Kaihui was with PwC Singapore, specialising in financial services tax. She has a focus on international tax advisory and broad experience advising on areas including the various tax aspects of M&A and other large corporate reorganisations and transactions for financial sector clients. Kaihui is a member of the Institute of Singapore Chartered Accountants.

Rob Colquhoun is a Director of Policy at the Australian Financial Markets Association (AFMA), as well as the Company Secretary and Financial Controller. He has primary carriage of AFMA's taxation and AML/CTF issues. Rob joined AFMA in December 2012 with more than 11 years experience in corporate taxation. Rob holds honours degrees in both Law and Commerce from the Australian National University.

Kristen Deards SC appears for taxpayers and the Commissioner of Taxation in income tax and GST cases in the Administrative Appeals Tribunal, the Federal Court and the High Court of Australia. She has appeared in a large range of tax cases, from complex Part IVA and transfer pricing cases, to disputes concerning CGT, the consolidation regime, international tax, superannuation, insurance, trusts and charities.

Joanne Dunne, CTA, is a lawyer from Melbourne. She was formerly a tax partner at law firms in both Australia and New Zealand. She has more than 25 years' tax experience in general income tax, GST, international tax, and tax controversy. Joanne is a member of a wide range of professional organisations, including The Tax Institute's Tax Disputes Committee, and until 2020 she represented The Tax Institute on the ATO's Dispute Resolution Working Group.

Teresa Dyson is a non-executive director of Seven West Media Ltd, Genex Power Ltd, entyr Ltd, Energy Queensland, Gold Coast Hospital & Health Service, Shine Justice Ltd, Brighter Super and the Foundation for Alcohol Research and Education.

Presenters

Teresa has also served as a member of the Foreign Investment Review Board and the Takeovers Panel and is a former chair of the Board of Taxation. Teresa is an independent member of the Australian Taxation Office Audit & Risk Committee. Teresa has over 25 years legal experience advising the private sector and governments on complex infrastructure, mergers and acquisitions, finance transactions and social infrastructure. She was formerly a partner of Ashurst and Deloitte.

Bevan Grace is a Partner in KPMG's Tax & Legal team. With nearly 25 years global financial services tax experience, Bevan specialises in the taxation of large Australian superannuation and managed funds and brings significant technical and practical experience in tax governance and strategy, global tax compliance, and tax regulator advocacy and engagement. Bevan re-joined KPMG in 2023 after 9 years at AustralianSuper where he established and led the in-house Group Tax function, and prior to that, was a Director with KPMG where he provided complete tax advisory and compliance services to large financial services organisations for 14 years (including two based in KPMG Dublin's Financial Service Tax practice).

Grant Harrison is a corporate tax Partner in PwC's Financial Services tax practice and has over 19 years' experience, including two years in the PwC London Banking and Capital Markets tax practice. Grant's clients are predominately foreign banking groups, non-bank lenders and trading groups. His experience includes mergers and acquisitions, due diligence, securitisation and supporting clients with ATO assurance reviews. He is a Chartered Accountant and a practising solicitor.

Scott Heezen is a partner at King & Wood Mallesons in Sydney. Scott is both a qualified lawyer and a Chartered Accountant and has more than 25 years' experience advising on a wide range of tax matters with a particular focus on property, infrastructure and funds transactions. He also advises numerous Australian banking and non-banking financial institutions on their capital raisings, financing and securitisation programs.

Julian Humphrey, CTA, is a partner of KPMG's Banking and Finance practice with over 25 years experience. He works primarily with international banks and financial services companies operating in Australia, providing corporate income tax advisory and compliance services.

Julian's areas of expertise include the taxation of banks and bank branches, the taxation of financial arrangements and retail financial products as more recently the taxation of crypto currency and digital assets. He is a regular participant in consultation with the government on Australia's tax reform proposals affecting the financial services sector.

Warren Hogan is the Managing Director and Founder of EQ Economics, a consultancy specialising in economic, market and industry analysis. Warren is also an economic advisor to Judo Bank, a specialist SME focused lender. Warren is a regular in Australian and international media. He is a columnist for the Australian Financial Review and a contributor to Sky News Australia. He is regarded as one of Australia's top economic analysts and commentators. His focus is on the Australian economy and supporting business decision making. Warren's career started in banking and financial markets where he held various roles as an economist and financial market strategist. With a strong focus on forecasting and prediction Warren values open-mindedness, critical thinking, and plain speaking. Theoretical foundations, historical precedent and statistical evidence are at the centre of

Warren's approach to economic problem solving. Warren lives in Sydney with his wife and two daughters.

Brad Ivens, ATI, is an associate partner in EY's Financial Services tax practice, focussing on wealth and asset management including superannuation funds and managed funds. In particular, Brad has over 20 years' experience in providing tax compliance and advisory services for the superannuation industry, covering matters such as investment due diligence, capital gains tax planning, unit pricing/crediting rate reviews, custodian tax reporting, fund administration, tax effect accounting, tax governance and ATO reviews/audits. His clients have ranged from some of Australia's largest industry and retail funds, through to public sector and employer-sponsored funds. Brad has also been an active contributor to the government and the ATO in relation to various superannuation tax issues and reforms.

Simon Jenner, CTA, is a partner in the Financial Services Tax practice at EY, specialising in banking and capital markets. Simon has over 24 years' experience advising large corporates on a variety of tax issues, including capital management, capital

Presenters

raisings, mergers, acquisitions, disposals and the application of the tax consolidation regime. He has also advised extensively on the application of the taxation of financial arrangements rules.

Ryan Kinsella is an account director with Deloitte with over 15 years' experience advising on Australian corporate and international tax matters. Ryan advises both funds and corporate groups on inbound and outbound transactions with areas of specialisation including tax consolidation and financing considerations, profit repatriation strategies and exit planning. Ryan also has a focus on international tax law reform and Base Erosion and Profit Shifting (BEPS) related measures, including Australia's hybrid mismatch rules and the OECD Pillars reform.

Victoria Lanyon is a Senior Associate in the taxation team at King & Wood Mallesons where she advises on all aspects of Australian taxation law for large multinational corporations. She has a particular focus on private equity, corporate, and resource clients and sits on the firm's climate and ESG committee. She also advises on matters involving the taxation of not-for-profits. In addition to her

Australian qualifications, Victoria has been awarded a Master of Laws from Columbia University and is licensed to practice law in the state of New York.

Shirley Lam is a partner at KPMG in its Deal Advisory Tax practice, based in Sydney. She specialises in infrastructure, energy, and corporates, and has worked on key transactions in the Australian landscape involving. Shirley works closely with asset managers and fund clients, and inbound strategic investors, on both entry and exit into assets as well as ongoing investment.

Alan Lee joined Great Southern Bank as Chief Financial Officer in 2023. A globally experienced finance executive with extensive exposure across retail and wholesale banking, Alan has worked in financial and professional services sectors across Europe, United Kingdom, Asia, and Australia. Prior to joining Great Southern Bank Alan was at ING Australia for over 20 years where he held senior roles in risk, home lending, audit and finance. Most recently he was Chief Financial Officer of at ING Bank (Australia) Limited and General Manager of ING Bank (Sydney Branch). In this role he collaborated closely with the CEO and management executives to achieve

the bank's strategy in Australia. Prior to this Alan was based in Singapore as ING's Asia Regional Chief Financial Officer. Having led multi-cultural, hybrid and high performance teams, Alan is passionate about developing people and building teams that are self-directed, have strategic clarity and are empowered to balance the demands of life while also being achievement focused. Alan has a Bachelor of Commerce from the University of Queensland, is a Chartered Accountant and certified Internal Auditor, and attended the Senior Executive Program at the London Business School. In 2018 he received the CFO of the Year award at RFI Group's Australian Retail Banking Awards.

Michelle Mori is a tax partner at EY and has over 18 years experience providing specialist tax and tax accounting advisory services to local and multinational organisations across the number of industries including retail and consumer products. She has extensive experience in relation to providing corporate advisory and tax compliance services to clients as well as in assisting Australian and multinational companies in the preparation of their ongoing tax accounting disclosures.

Shahzeb Panhwar is a partner in PwC's Tax Controversy practice. Shahzeb has extensive experience in international tax, tax structuring and transfer pricing matters across a number of industries. Before joining PwC Shahzeb was an Assistant Commissioner with the ATO and had strategic oversight of a number of strategic tax risks and strategies.

Sarah Pang, is a commercially focused tax executive with 18 years' experience in the financial services industry both in-house and within professional services in Australia and the United Kingdom. Sarah is currently the Head of Tax at IAG (Insurance Australia Group) focusing on domestic and international acquisitions, restructures and divestment of assets, tax risk governance, dividend management, capital raisings, fund structuring, transfer pricing issues and tax representation on Boards and Audit Committees and frequently participates in consultations to develop Australian tax laws. She also currently sits on the Board of the Financial Services Accountants Association.

Natalie Raju is a Tax Partner within the Financial Services division of KPMG, with more than 20 years' experience advising on taxation issues relevant to

Presenters

the funds management, custody and broader financial services industry. Natalie also has five years in-house experience with a fund manager, where she was a lead product originator and tax counsel. Natalie has a particular passion for financial product innovation and partnering with financial service providers to ensure the correct tax outcomes.

Julian Pinson, FTI, is a partner at PwC. Julian advises on a wide range of tax matters, with a focus on banking and financial services and M&A. Julian has particular expertise in cross-border finance, TOFA, corporate restructures, debt and equity raisings and M&A.

Priscilla Ratilal, ATI, is a partner in the Deloitte Australia Transfer Pricing team. Priscilla has over 18 years of transfer pricing experience across Sydney, New York and London. Priscilla specialises in advising on intra-group financing activities and serving clients in the financial services industry across the asset management, insurance, banking and fintech sectors. Priscilla's client experience includes transfer pricing policy development and implementation, preparation of documentation, Country-by-Country reporting, mergers and acquisitions

(due diligence and structuring) and engagement with tax authorities in the context of Advance Pricing Agreements (APAs), audits and reviews. Priscilla also has in-house experience in a diversified financial services group, managing transfer pricing for the Americas region.

Michelle Siu is a senior manager in the investment tax team at Aware Super. Aware Super is one of Australia's largest superannuation funds and is committed to earning strong long-term returns and being a force for good for its members. Michelle leads the investment tax team in advising on the Fund's domestic and international investments across various asset classes, including private equity, infrastructure, property and credit. Michelle has over 13 years of experience within in-house transaction tax teams and as a tax advisor at PwC in Australia, UK and New Zealand, specialising in the financial services sector.

Blake Sly is a Senior Director in the Public Groups Private Equity Branch of the ATO which has oversight of the Private Equity, Collective Investment Vehicle (CIV), Infrastructure and Foreign Fund Strategy teams and the CIV Top 1000 assurance team. Blake

has previously held a number of roles across the ATO including Senior Director Investment Industry Strategy which included oversight over insurance companies, large APRA regulated superannuation funds and managed investment funds and Director roles in PG Strategy and PG Engagement and Assurance.

The Hon Allegra Spender MP, is the independent member for the federal seat of Wentworth. She is a mum, business leader, and renewable energy advocate, and was elected in 2022 on a platform of climate action, integrity, inclusivity, and a future-focused economy. Allegra has diverse leadership experience in the corporate, non-profit, private, and public sectors. She started her career at McKinsey & Company, before working at the U.K. Treasury and in a leading U.K. public teaching hospital. From 2008 to 2016, Allegra was the Managing Director of Carla Zampatti, a leading Australian designer fashion business. She was also Chair of Sydney Renewable Power Company, a renewable impact investment company that financed over 500kw of solar on the International Convention Centre. Prior to standing for Wentworth, Allegra was the CEO of Australian Business and Community Network (ABCN) a social

mobility not-for-profit. The network is made up of a group of forty leading corporations, including Macquarie, Microsoft, Lendlease, Optus and Bain, whose team members mentor over 5,000 students from low socio-economic backgrounds.

Amelia Teng is an international tax partner at Deloitte who specialises in cross-border tax structuring issues and has a focus on tax policy initiatives and BEPS reforms. In her past roles she has been closely involved in the development and implementation of BEPS measures.

Wendy Tse, has been Head of Tax at Magellan Financial Group since 2015. Prior to Magellan, she managed and led the tax function at BlackRock in Australia for more than eight years. Wendy has extensive experience in the wealth management industry focussing on fund structuring and product rationalisation, domestic and cross-border corporate tax matters. Her role is also responsible for managing the Group's tax risk governance and making tax representations on Boards and Audit Committees. She has worked with key stakeholders on various tax reforms including the Attribution Managed Investment Trust regime.

Presenters

Remali Vilathgamuwa, CTA, is a partner who leads EY's Financial Services Tax Controversy Practice. She has over 18 years' experience in managing Australian Taxation Office ("ATO") reviews, audits and litigation. In Tax Governance Remali assists clients implement, review and test their tax governance in accordance with ATO guidelines and client's internal risk management process and procedures. Remali has been more recently been assisting clients with respect to the ATO's Governance over Third Party Data supplementary guide. Remali has successfully assisted top 100 and top 1000 clients achieve both stage 2 and stage 3 ratings overall and in relation to tax governance.

Steve Whittington is a partner in the direct tax practice at Ashurst. Steve advises on a wide range of tax matters, with a focus on funds, real estate acquisitions, mergers and acquisitions, and financial arrangements. His expertise in advising on the establishment of funds extends to commercial office, build to rent, hotels, logistics, retail, and infrastructure. Steve has participated heavily in the consultation process relating to thin capitalisation, including as a representative of the Property Council's Capital Markets Committee.

Angela Wood, CTA, is a partner in Clayton Utz's Tax Dispute Resolution & Controversy practice. A leading tax dispute resolution and litigation lawyer, Angela brings an exceptional track record of success over 25 years' dedicated practice in the field. She focuses on proactive, efficient and early resolution of disputes, advising multinational and large domestic corporates on complex international and domestic tax and administrative law issues. Angela is known for her strategic, practical advice, and her ability to strike the right balance between robust representation for taxpayers and maintaining productive working relationships with revenue regulators to achieve the best results, and has deep tax litigation experience having run significant Federal, State and High Court matters for both the Commissioner of Tax and for taxpayers.

Bill Yohana, ATI, is a Melbourne-based Partner with BDO Australia's Transfer Pricing Practice. He has over twenty-five years of transfer pricing consulting experience, with a focus on assisting clients with evaluating the transfer pricing implications of intra-group financial transactions, as well as providing transfer pricing advice to major financial institutions,

including commercial banks, securities firms, insurers, hedge funds, private equity investors, asset managers, family offices and real estate development and investment firms. In providing this advice, he draws upon knowledge gained in the first nine years of his career, where he held front office roles in U.S. and emerging market equity and balanced account investment management, the analysis of payment systems risk, and fixed

income derivative structuring and marketing. Bill has a BA in Economics from the University of Chicago, was a visiting student in Philosophy and Economics at Jesus College, University of Oxford and holds an MBA degree from Cornell University's Johnson Graduate School of Management, with a focus in Finance and International Business. Bill is a CFA Charterholder and an Associate member of the Tax Institute.



Venue and accommodation



Crown Sydney

1 Barangaroo Ave, Barangaroo NSW 2000

Crown Sydney offers uncompromising design that captures the essence of its harbour side setting, highly intuitive personalised service, and the finest dining and facilities unlike anything Sydney has seen before. Located in the bustling precinct of Barangaroo, connected to sprawling parklands, laneway bars, beautiful public artworks and bay views of Sydney.

Getting there

Crown Sydney is centrally located along the Barangaroo waterfront, close to the heart of Sydney. Sydney Airport is located just 15 kilometres from the hotel. The closest train station is the Wynyard stop, a 9-minute walk to Crown Sydney. The closest light rail stop is the Bridge Street stop, where the L2 and L3 run. This stop is an 11-minute walk to Crown Sydney. The closest stop is Barangaroo South on Hickson Rd, which is a 3-minute walk to Crown Sydney.

Parking

Valet Parking is available through the hotel's Bell Desk team at the rate of \$80.00 per 24 hours. Alternatively, the Barangaroo Reserve car park is a 10-minute walk to Crown Sydney. We invite you to visit the website to view the most current rates and book in advance here – www.carepark.com.au/find-a-care-park/barangaroo-reserve. The closest Wilsons public car park is located at Barangaroo Reserve, however, please kindly be aware this parking lot does not operate 24 hours. For more information you can also visit <https://www.crownsydney.com.au/general/getting-here>.

Accommodation

We have negotiated special rates for delegates attending the conference (subject to availability).

Please click [here](#) for more information or to make a booking. Kindly note, this offer is not combinable with other offers and non-commissionable.

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 conference counts for 11 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

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

Delegate list

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

Dress code

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

Networking function – Thursday 14 March 2024

A networking function will be held directly following the last session on Thursday from 5:30pm. The networking function is included in the conference registration fee for delegates. Additional tickets are available to purchase for accompanying persons at a cost of \$80. Please indicate your requirements, including dietary requirements, at the time of registration.

Special dietary and accessibility requirements

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

Cancellation policy

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

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

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

Privacy

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

Enquiries

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

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

Registration

Registration inclusions

	Online access to presentations and technical papers	Morning/ afternoon tea/ conference lunches	Networking function*
Face-to-face full registration This registration option entitles one delegate to attend the entire event.	✓✓	✓✓	✓✓

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

Discounts


Early bird registration

All registrations received and paid on or before Friday, 16 February 2024 will be entitled to an early bird discount.

Group discounts

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

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



Register now!

Register online ▶

Register via form ▶
included in this brochure



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

1 Registration

Please see page 17 for registration inclusions.

Full registration – 11 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before Friday, 16 February 2024	<input type="checkbox"/> \$1,800	<input type="checkbox"/> \$2,170	<input type="checkbox"/> \$2,100
Standard registration Register after Friday, 16 February 2024	<input type="checkbox"/> \$2,000	<input type="checkbox"/> \$2,370	<input type="checkbox"/> \$2,300

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

Networking function

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

Thursday, 14 March 2024

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

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

Dietary requirements:

*Become a member and save!

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

- up to **50% off membership** to 30 June 2024
- member-only prices to this and future events
- free access to member-only technical resources.

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

I hereby apply for membership of The Tax Institute and declare that I am a person of good fame, integrity and character. I agree to be bound by the Constitution of The Tax Institute.

Signature:

Date of signature:

JOIN TODAY

2 Delegate contact details

Member no.:

If your member details are up-to-date, you can skip this section.

Title: Mr Mrs Miss Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb: State: Postcode:

Telephone: Mobile:

Email:

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

3 Breakout session options

Please tick the breakout sessions you would like to attend during the forum:

Thursday, 14 March

- 12:00–1:00pm Session 3A Session 3B
- 2:00–3:00pm Session 4A Session 4B
- 3:30–4:30pm Session 5A Session 5B
- 4:30–5:30pm Session 6A Session 6B

Friday, 15 March

- 9:30–10:30am Session 8A Session 8B

4 Payment summary

Registration fees

\$

Additional guest tickets – networking function (\$80 each)

\$

Total payable

\$

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

5 Payment method

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

Cheque payable to The Tax Institute (in Australian dollars)

Credit card Card type: AMEX Visa MasterCard Diners

Name on card:

Card no.:

Expiry date:

Cardholder's
signature:

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

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 TTI's Privacy Policy and you consent to your personal information being collected, used and held by TTI and disclosed to third parties in accordance with TTI's Privacy Policy.





To register

Email customeradmin@taxinstitute.com.au

Mail L37, 100 Miller Street North Sydney NSW 2060

Online taxinstitute.com.au

Join the conversation

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

