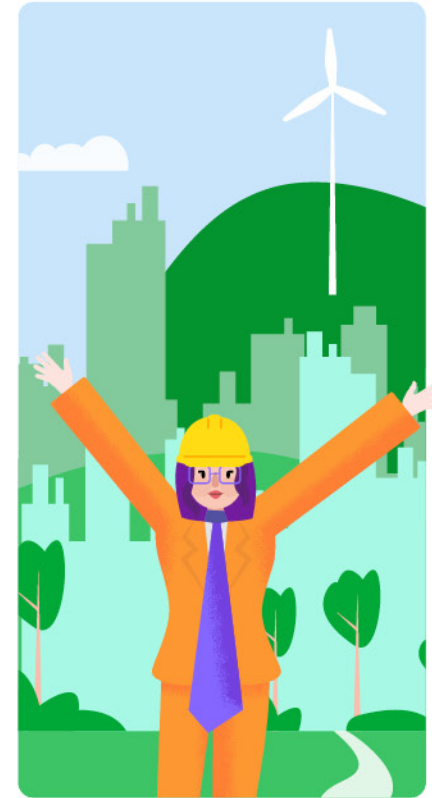
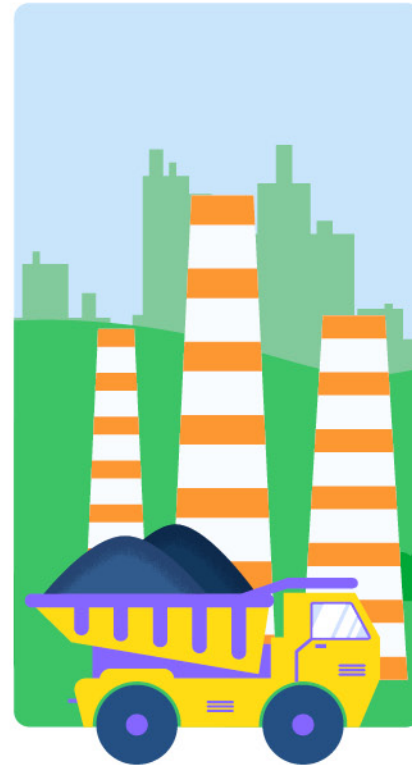
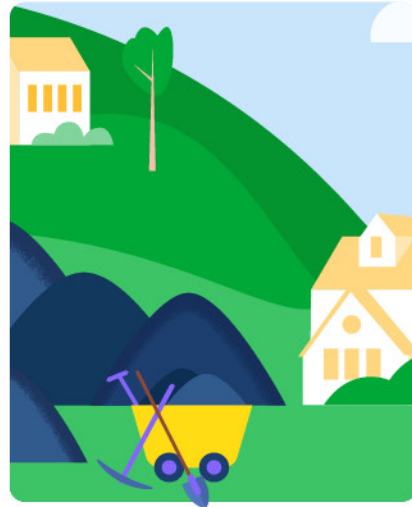


National Resources Tax Conference

21–22 November 2024

The Westin Perth

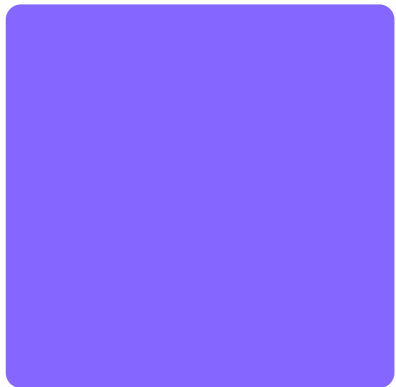
10 CPD hours



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

Lauren Jones, CTA, Deloitte (Chair)
Jason Barnes, CTA, King & Wood Mallesons
Nick Heggart, CTA, Herbert Smith Freehills
Susan Hinton, Rio Tinto
Luke Hutchinson, Shell
Lauren Moses, Jones Day
Robyn Murphy, Santos
Matthew Persse, Australian Taxation Office
Alistair Smith, EY
Dr Niv Tadmor, CTA, Jones Day
Melissa Walton, CTA, BDO

Proudly supported by:





Welcome

It gives me great pleasure to invite you to attend our National Resources Tax Conference to be held at the Westin in Perth on 21-22 November 2024.

This conference has long been recognised as Australia's leading tax conference focused entirely on the energy and resources sectors.

As in previous years, the conference program will provide updates on the tax issues that are front of mind for industry. In particular, a number of sessions will focus on the energy transition. I expect there to be plenty of interesting discussion both at the formal sessions and at the networking events.

The National Resources Tax Conference has always strived to be at the forefront of current and emerging tax issues for the energy and resources sectors and the Committee has worked hard to develop a program that maintains that status. It brings together regulators and leading practitioners for two days to discuss tax and related challenges and the opportunities that these will bring. Speakers have been chosen because they are leading tax experts with the essential blend of knowledge and experience in the practical application of the laws.

The Tax Institute's programs are renowned for delivering leading technical presenters with practical solutions and thoughts on the key tax issues. This year will be no exception as we deliver Australia's preeminent energy and resources tax conference.

As always, in addition to a first-rate technical program, delivered in the heart of Perth's CBD, we will also provide ample networking opportunities, including an exclusive conference networking reception, to renew and make new connections across the energy and resources sectors.

This year's program is no different.

I encourage you to register your attendance on or before Friday 25 October to receive the early bird discount and ensure your place.

Finally, I would like to take the opportunity to thank the organising committee for their work in putting this exceptional program together.

I look forward to seeing you there.



Lauren Jones, CTA, Deloitte
Chair, National Resources Tax Conference Organising Committee

Early bird pricing offer
Register on or before Friday, 25 October 2024 to save!

Technical program

Day 1 Thursday, 21 November 2024

Time	Presenter(s)	
8:00 – 8:45am	Registration	
8:45 – 9:00am	Welcome and President’s address Speaker: Lauren Jones, CTA, Chair, National Resources Tax Conference Organising Committee, Todd Want, CTA, President, The Tax Institute	
9:00 – 10:00am	Session 1: Economic update Speaker: Aaron Walker, Head of Economics, CMEWA	
10:00 – 11:00am	Session 2: Division 40 and resource projects post Shell Speakers: Martin Fry, FTI, Allens, Ria Neilson, Allens This session provides an update on the recent developments in Division 40, primarily focusing on: <ul style="list-style-type: none">• The change in how MQPRs are “used” under the legislative amendments in response to the Shell case• New MQPRs issued as a subset of an existing ‘old’ MQPR• Learnings from the Shell case outside of the legislative ‘fixes’• When does a joint venturer hold an interest in a Division 40 asset held by the joint venture; and• Recent case law affecting Division 40 terms and concepts.	
11:00 – 11:30am	Morning tea	
11:30am – 12:15pm	Session 3A: BEPS Pillar Two – The saga continues Speaker: Natalie Chang, FTI, Rio Tinto, Alia Lum, CTA, KPMG As many organisations continue to grapple with implementation of the BEPS Pillar 2 initiative, this session will focus on: <ul style="list-style-type: none">• Status update and key issues around application dates• Practical implementation issues; and• Financial reporting and compliance considerations.	Session 3B: R&D and government grant funding Speaker: Melissa Fardone, ATI, BDO, Leigh Pearce, ATI, BDO This session will explore critical updates and common pitfalls in R&D Tax Incentives, alongside funding opportunities for hydrogen and renewable energy projects. This session will discuss: <ul style="list-style-type: none">• Key updates to the R&D Tax Incentive program• Common mistakes in R&D Tax Incentive applications and how to avoid them• Grant availability and eligibility criteria for hydrogen and renewable energy projects; and• Strategies for successful grant applications and real-world examples.

Technical program

Day 1 Thursday, 21 November 2024 continued

Time	Presenter(s)	
12:15–1:00pm	<p>Session 4A: PRRT – Recent developments Speakers: Philip Bisset, CTA, Clayton Utz, Paul Corrie, Australian Taxation Office, Suzie Emery, Australian Taxation Office, Julia Low, Australian Taxation Office</p> <p>This session will provide an overview of recent developments regarding the petroleum resource rent tax.</p> <p>The ATO will be discussing its compliance approach and will provide its observations on changes to the law, public guidance and matters attracting their attention.</p>	<p>Session 4B: M&A update session Speakers: Justin Cherrington, King & Wood Mallesons, Victoria Lanyon, King & Wood Mallesons</p> <p>This session will consider recent developments in the tax aspects of M&A transactions. In particular, the session will:</p> <ul style="list-style-type: none">• Outline key recent deals in the natural resources sector• Discuss some key tax considerations in those deals; and• Consider the impact of recent case law and new legislation on natural resource M&A deals going forward.
1:00–2:00pm	Lunch	
2:00–2:45pm	<p>Session 5A: Tax technology and ERP implementation Speakers: Barry Groenendijk, Deloitte, Jody Shand, Deloitte</p> <p>There has been rapid change in ERP systems and tax technology to allow taxpayers to meet the needs of stakeholders and government for increased transparency.</p> <p>In this session the focus will be drawn to:</p> <ul style="list-style-type: none">• Why does tax need to be involved in ERP system implementation and when• What are the important considerations for ERP implementations such as data sets to be captured and governance• Where do we see the common pain points• Data sets which need to be captured (compliance, reporting and Pillar 2); and• Technology solutions available for tax payers for compliance and reporting and what should be considered when choosing tax technology.	<p>Session 5B: From farm-in to carbon farming Speaker: Matt Plint, Plint Legal</p> <p>This session will examine the stamp duty issues that natural resource entities encounter from the exploration phase (including farm-in concessions) through to maturity of the life of mine (including acquisitions and public offerings).</p> <p>The discussion will have an emphasis on decarbonisation and the impact of the shift to renewable energy.</p>
2:45–3:15pm	Afternoon tea	

Technical program

Day 1 Thursday, 21 November 2024 continued

Time	Presenter(s)
3:15–4:15pm	<p>Session 6: Interest limitation rules Speakers: Cameron Blackwood, ATI, Corrs, Mathew Chamberlain, CTA, EY, Harjit Singh, FTI, Australian Taxation Office</p> <p>This practical panel session featuring senior tax professionals from the ATO and advisory will discuss the key practical issues, outcomes and challenges with the new law, including those associated with:</p> <ul style="list-style-type: none">• Transitioning to the new thin cap rules• Their interaction with the transfer pricing rules as to quantum of debt• Understanding the new debt deduction creation rules (especially as they apply to pre 1 July 2024 transactions); and• Navigating the new third-party debt test.
4:15–5:15pm	<p>Session 7: ATO programs – A panel discussion Speakers: Megan Croaker, Australian Taxation Office, Brian Purdy, CTA, South32, David Stevenson, Australia Taxation Office</p> <p>The ATO, together with Brian Purdy from South32 will present on the 2024/5 Justified Trust program for the Top 100 and the Combined Assurance program for the Top 1000.</p> <p>This session will also include updates on:</p> <ul style="list-style-type: none">• 2024 Top 100 and Top 1000 Findings reports• What is attracting the ATO’s attention• Top 100 program updates; and• Differentiated approach for the Top 1000.
From 5:15	Conference Networking function



Conference Networking Function

Join your colleagues and conference speakers for an evening of canapes, drinks and networking.

Date: Thursday, 21 November 2024

Time: From 5:15pm

Venue: The Westin Perth

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

Dress: Business or business casual

Technical program

Day 2 Friday, 22 November 2024

Time	Presenter(s)
8:00 – 8:30am	Registration
8:30 – 9:30am	<p>Session 8: The changing intangibles tax landscape Speaker: Jacques Van Rhyn, ATI, Deloitte</p> <p>The use of intangibles is no longer limited to tech companies. Resource companies have embraced technology and other intangibles to remain competitive and unlock value from their non-renewable resources. With the increased focus by tax authorities on the role and value created by intangibles, taxpayers need to understand this changing tax landscape and how this will impact their compliance obligations.</p> <p>This session will largely focus on the recently published PCG 2024/1 on Intangibles Migration Arrangements and the interplay with other tax provisions, RTP disclosures and recent case law.</p>
9:30 – 10:30am	<p>Session 9: Demystifying carbon offsets projects and Australian Carbon Credit Units (ACCUs) Speakers: Tristan Boyd, FTI, Herbert Smith Freehills, Naomi Hutchings, Herbert Smith Freehills</p> <p>Participants in the resources sector are bound to have an ever-increasing focus on ACCUs. This “back to basics” session will address:</p> <ul style="list-style-type: none">• The ACCU Scheme including what is an ACCU, key characteristics and how ACCUs are generated.• Markets for ACCUs, what are they used for and how they are traded.• Carbon offset projects under the Carbon Credits (Carbon Farming Initiative) Act:<ul style="list-style-type: none">– Key requirements to establish and maintain a carbon offsets project.– How this relates to the timing and costs associated with the generation of ACCUs.• Division 420 and the tax treatment of ACCUs.



Technical program

Day 2 Friday, 22 November 2024 continued

Time	Presenter(s)
10:30-11:00am	Morning tea
11:00am-12:00pm	<p>Session 10: Dealing with environmental and decarbonisation costs Speaker: Enzo Coia, CTA, Deloitte</p> <p>Managing energy transition and environmental obligations is critically important in the energy and resources sector. This session will use practical examples to explore the way in which the tax system deals with costs associated with managing environmental obligations and decarbonisation initiatives, including carbon capture and storage. Issues that will be covered include:</p> <ul style="list-style-type: none">• In which cases are costs “business as usual” and immediately deductible (as a general deduction or capital allowance)• Dealing with the treatment of early stage exploratory and feasibility expenditure• In which cases should expenditure be included in the cost of an asset and what decline in value applies to the asset• How the project pool provisions apply to these types of expenditures; and• How the timing of these costs can impact value in an M&A context.
12:00-1:00pm	<p>Session 11: Embedded royalties Panel: Dr Julianne Jaques KC, CTA, Victorian Bar, Evan Lang, Australian Taxation Office, Benjamin Lancaster, Jones Day Facilitator: Alexandra Fraser, Jones Day</p> <p>Recent developments in relation to embedded royalties are changing the compliance environment for taxpayers. This panel presentation will discuss these issues and cover emerging issues and developments including:</p> <ul style="list-style-type: none">• What is an “embedded royalty” and what are the practical implications of attempting to separate payments for goods or services from payments for associated intellectual property• ATO guidance including Draft Taxation Ruling TR 2024/D1 (Character of payments in respect of software and intellectual property rights) and Taxpayer Alert TA 2018/2 (Mischaracterisation of activities or payments in connection with intangible assets)• Which industries may be affected beyond tech and what questions may be raised in the energy and resources industry; and• Impact on Australian-headquartered businesses if other global revenue authorities adopt a similar approach to the ATO.
1:00-2:00pm	Close & Lunch

Presenters

Philip Bisset, CTA, is a taxation partner at Clayton Utz. He has over 30 years' experience in many facets of revenue law and commercial taxation, practising as a lawyer, chartered accountant and corporate tax manager. He has significant experience in managing audit and tax disputes and in negotiating settlements to successful outcomes. Philip also helps his clients develop robust tax policies and risk guidelines to minimise the potential reputational and commercial threats to their organisations in connection with tax audits and disputes. Philip is the instructing solicitor for a number of cases currently before the Federal Court.

Cameron Blackwood, ATI, is the Head of Tax at Corrs Chambers Westgarth and is a leading transactional tax expert, specialising in mergers, acquisitions, and restructures. Having advised several of Australia's largest taxpayers, Cameron's expertise includes cross-border issues and all aspects of employee share schemes. He has significant experience acting for public and private companies on capital management, including capital raising, return of capital, special dividends and buy-backs and debt raisings. He regularly presents at The Tax Institute and the Corporate Tax Association on

M&A, management incentive plans and international tax issues and demergers. Cameron has been recognised as a leading lawyer by legal directories and publications including Chambers, The Legal 500 Asia Pacific and Best Lawyers for Tax in Australia.

Tristan Boyd, FTI, is an Executive Counsel at Herbert Smith Freehills. He has more than 15 years' practice in corporate tax and transactional matters, with broad expertise across income tax, stamp duty and GST and a focus on the natural resources and real estate sectors. His experience includes advising on tax issues for acquisitions and divestments, financing, joint ventures, farm-ins, and treatment of expenditure. Tristan holds a Bachelor of Laws and a Bachelor of Commerce with First Class Honours from the University of Western Australia, and a Masters of Taxation from the University of New South Wales.

Mathew Chamberlain, CTA, is a partner at EY and leads the Perth International Tax Services team. A legal practitioner admitted in WA and NSW, he has more than 30 years' experience in international tax, focusing on the large multinational and corporate environments across Australia, the US, Europe, Asia-Pacific and Africa. Mathew specialises in international tax reform, foreign

investment into Australia and outbound investment from Australia. A long-time member of The Tax Institute, Mathew has presented at numerous national and state conventions on international tax issues and has also lectured on tax law at UWA and Curtin. Mathew has also led and participated in a number of government and ATO initiatives, working groups etc. on international tax law and policy issues affecting Australian inbound and outbound investment, including development submissions on tax residency and the treatment of taxpayers in the oil and gas services and shipping industries.

Natalie Chang, FTI, is a Senior Manager, Global Tax Advisory at Rio Tinto with responsibility to provide strategic tax advice to executive management on tax issues impacting the global Rio Tinto Group, including global M&A projects. More recently, Natalie has supported the provision of Rio Tinto's input into the OECD Pillar 2 tax policy development through the Business and Industry Advisory Committee to the OECD and has a key role leading the policy & strategy aspects of Rio Tinto's OECD Digital Implementation Project. She has been a tax practitioner for over 15 years and prior to joining Rio Tinto, Natalie was a Transaction Taxes Director at a Big 4 Firm.

Justin Cherrington practices in both Hong Kong and Australia, where he specialises in the tax issues in both jurisdictions. He is closely involved in all manner of tax work including major acquisitions, corporate restructures, and international tax issues. His work specifically includes all aspects of corporate taxation, including the tax consolidation regime, dividend imputation, capital gains tax and capital distributions.

Enzo Coia, CTA, is a Tax Partner at Deloitte and leads the tax practice in power and utilities nationally and has deep expertise in advising clients in the mining and oil and gas industry. He has more than 20 years' experience providing advice on Australian and international taxation matters. He specialises in mergers and acquisitions, financing, capital management and dealing with revenue authorities.

Paul Corrie is a Senior Law Interpretation Specialist in the Office of the Chief Tax Counsel, Tax Counsel Network at the Australian Taxation Office. In his current role, Paul provides advice on corporate income tax matters with a particular focus on energy and resources including the petroleum resource rent tax law.

Presenters

Megan Croaker is an Assistant Commissioner in Public Groups and Internationals, leading the Top 1000 program. Megan started her career specialising in GST at a large advisory firm before joining the ATO in 2017. During her time at the ATO Megan has led the GST Financial Services and Insurance strategy, JobKeeper Compliance, and the ATO's Criminal Law Program.

Suzie Emery is the Assistant Commissioner, Engagement & Assurance – Perth and Oil & Gas strategy. Suzie has a range of private practice experience, primarily in controversy and dispute resolution. Since joining the ATO, her focus has been compliance and assurance programs aimed at ensuring large businesses pay the right amount of tax in Australia. She led the Public Groups Private Equity branch covering a range of strategies impacting the private credit market and has also played a key role in the advisor strategy which concentrates on the role that intermediaries play in supporting large businesses.

Melissa Fardone, ATI, leads BDO's Adelaide based grant work and has over 10 years of experience assisting entities with their grant work both as a consultant and when working for the Federal Government. During her

time with Federal Government, Melissa managed the Adelaide based grant team for AusIndustry. This included managing administration of the Federal Government's renewable energy funding schemes for South Australia, worth approximately \$2 billion. This included assessment and sign off of renewable energy grants across the Clean Technology Investment Program, Clean Technology Food and Foundries Investment Program, and the Clean Technology Innovation Program. Melissa was also heavily involved in administration of several other grant funds focussed on small business support and commercialisation activities. In addition to her time with AusIndustry, Melissa spent 5.5 years with EY, where she managed all grant work for the Adelaide office. This involved the successful lodgement of grants to the ARENA Advancing Renewables Program and the previous SA Economic Investment Fund, helping a prominent food manufacturer secure \$20m of investment for a factory expansion. These experiences have not only given Melissa an excellent understanding of how the Government assess grant applications, but have also enabled her to build important relationships across both Federal and State Government departments.

Alexandra Fraser is an experienced tax controversy practitioner assisting large Australian and multinational corporations to navigate the complexities and challenges of a dispute with the Australian Taxation Office. She has experience across all stages of the dispute process including information gathering, audit and objections, right through to litigation. Alexandra has represented both private clients and the Government (Inland Revenue of New Zealand) in large and complex tax litigation at all levels of the Court system across three jurisdictions (New Zealand, United Kingdom and Australia). This experience gives her a unique insight and perspective on strategic considerations in all matters she is involved in. Alexandra advises across all areas of federal and state taxation with a particular focus on international taxation including transfer pricing, anti-avoidance and integrity measures.

Martin Fry, FTI, is the Practice Leader of the Allens Tax Group. Martin represented the taxpayer in *Shell Energy v Commissioner of Taxation* before the Federal Court, Full Federal Court and High Court. With over 20 years as a Partner of Allens, Martin advises corporations on a broad range of tax issues across a wide range of sectors, including resources, infrastructure,

financial services and IP-intensive businesses. Martin has extensive experience in contentious matters, including audits, settlement negotiations, mutual agreement procedure and litigation. Martin has taught Corporate Tax at a postgraduate level at the University of Melbourne.

Barry Groenendijk is a Director in Deloitte's Tax Technology Consulting team. He has worked in the field of Tax Technology for direct taxes for 13 years and works with his multinational clients by articulating and designing their tax technology vision and roadmap on all tax types and helps to deliver solutions that span from ERP systems, consolidation systems, data analytics to specific solutions, although often focusing to direct tax and tax accounting solutions.

Naomi Hutchings is Executive Counsel in the Environment, Planning and Communities team at Herbert Smith Freehills. She provides commercially focussed, strategic and practical advice on environment, planning, land access and native title and heritage issues. She works regularly for clients who are developing carbon farming projects. She brings insights and perspectives gained from working in private practice, in-house for BHP and BBI Group, and in environmental policy development for government.

Presenters

She has worked across multiple jurisdictions in Australia and overseas. According to Legal 500 'Perth's Naomi Hutchings has deep knowledge of new policies and regulations concerning the transition to a lower carbon economy.' She holds a Master of Laws (Environmental) from University of Sydney, and is a graduate of the Australian Institute of Company Directors. Naomi also sits on the Mining Rehabilitation Advisory Panel, an independent statutory panel which provides expert advice to the Director General of the West Australian Department of Mines, Industry Regulation and Safety.

Dr Julianne Jaques KC, CTA, is a barrister specialising in taxation. Cases in which she has appeared include Sharpcan and Bywater in the High Court. Prior to coming to the Bar, Julianne spent 10 years in private practice with a major accounting firm and a major law firm, and 2 years as senior taxation adviser to the Federal Assistant Treasurer. She is a Chartered Tax Adviser and a Chartered Accountant, and was awarded a doctorate from the University of Melbourne for her thesis on the taxation on corporates. Julianne is a current member of the Federal Government's Board of Taxation

(reappointed December 2023) and Independent Parliamentary Expenses Authority (reappointed July 2022), and a former member of Tax Practitioners (2016-2022). In 2020, Julianne was awarded Chartered Tax Adviser of the Year by The Tax Institute.

Benjamin Lancaster is an Of Counsel in the Australian tax team of international law firm Jones Day. Benjamin predominately practices in the area of tax dispute resolution, with a particular focus on transfer pricing and other international tax issues. He has extensive experience in responding to audits, managing objection processes, providing strategic advice, and conducting tax litigation.

Evan Lang is an international tax specialist within Public Groups at the ATO. He is currently involved in the ATO's risk and strategy approach to arrangements involving intangibles, focusing on royalty withholding tax and intangibles migration. Prior to his current role, Evan worked at Treasury on international tax policy and as a tax treaty negotiator.

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.

Julia Low is a Senior Law Interpretation Specialist in the Office of the Chief Tax Counsel, at the Australian Taxation Office. Her current role focuses on resolving tax law issues on a range of topics including petroleum resource rent tax, schemes and tax administration law.

Alia Lum, CTA, is a tax partner at KPMG with more than 20 years of experience in corporate tax, specializing in financial services, international tax and tax transformation. She is KPMG Australia's Tax Policy and Regulatory Lead. Alia has previously undertaken secondments to London and Singapore and had close to two years seconded to the Australian Federal Treasury Revenue Group and the Board of Tax Secretariat.

Ria Neilson is a Senior Associate in the tax group at Allens. Ria routinely

advises on a broad range of Australian income tax matters for domestic and international clients. Ria has particular experience in the audit and pre-litigation management of tax disputes and is currently involved in assisting a number of clients to resolve disagreements with the Australian Taxation Office in the infrastructure, resources and superannuation sectors.

Leigh Pearce, ATI, having worked for both PwC and BDO, Leigh brings broad industry experience in assisting a diverse range of industries, from start-up to multinational corporations, achieve their innovation goals. Leigh guides clients through all facets of the R&D application and regulatory review processes, providing robust technical and financial analysis to streamline and support the R&D claim process.

Matt Plint is a lawyer specialising in transaction taxes. He developed his skills at a multinational firm for 13 years. As part of a national team run via Melbourne, Matt assisted a diverse client base. He has predominantly worked in Perth with a secondment to Brisbane in 2010-2011. Matt has developed particular expertise regarding indirect tax matters and takes instructions on discrete income tax disputes.

Presenters

Brian Purdy, CTA, is Vice President – Tax & Treasury and is responsible for tax and treasury aspects at South32 and a director of many international group companies. Brian also participates in the ATO Large Business Stewardship Group. He joined South32 from BHP Billiton, where he was Vice-President Tax – Asia Pacific before moving into finance roles in the iron ore business. Brian is a graduate of University of Western Australia and is a member of Chartered Accountants Australia & New Zealand, The Tax Institute and the Australian Institute of Company Directors.

Jody Shand is a Director in Deloitte's Business Tax Advisory team, specialising in tax technology, governance and tax function transformation. She has over 17 years' experience working with large Australian and inbound multinational clients on large scale compliance engagements and has extensive experience with the design and implementation of tax compliance solutions.

Harjit Singh is an Assistant Commissioner in the Tax Counsel Network at the Australian Taxation Office. In this role Harjit provides technical advice on some of the ATO's most complex and pressing tax matters. Harjit has experience working in various

roles at the ATO including, leading case teams in Public Groups and International, leading, developing and implementing the ATO's Energy & Resources Strategy and the Top 1000 program. Harjit started his career in a large advisory firm advising on domestic and international tax matters.

David Stevenson is an Assistant Commissioner in Public Groups currently leading the ATO's Energy & Resources Strategy along with the Brisbane Engagement & Assurance branch of seven income tax and GST teams. David has over 20 years of experience across various roles in the private sector and ATO.

Jacques van Rhyn, ATI, is an international tax and transfer pricing partner based in Brisbane. He has been in professional practice for 35 years, including 25 years in international tax and transfer pricing practices within Big Four firms, and 10 years practising as a commercial attorney in an in-house capacity and for his own account. Jacques has extensive experience advising multinational companies on various cross-border tax and transfer pricing issues, especially in the energy and resources sector, with a specific focus on mining, oil and gas, related services companies

and intangibles. He has been listed in Euromoney's Expert Guide to the World's Leading Transfer Pricing Advisers in South Africa and Australia as well as the World's Leading Controversy Lawyers. In addition, he has published articles on international tax and transfer pricing, mining, oil and gas, and contributed to several intellectual property publications. He is a frequent speaker at global events on intangibles, tax controversy and transfer pricing.

Aaron Walker joined the CME team in July 2023 as Senior Economist and Manager of Industry Competitiveness and Economics. Aaron has more than 10 years of experience across macroeconomic and financial roles, including as a Senior Economist at the Reserve Bank of Australia, and Project Analyst at Wesfarmers. In his more recent role at the RBA, Aaron oversaw the Bank's Liaison Program in the state and undertook research and analysis across many sectors of the economy, including minerals and energy. Through this role, he gained valuable insights into industry sentiment and the operating environment of many of CME's member companies. Aaron holds a Double Degree in Economics and Commerce, with First Class Honours in Economics, from the University of Western Australia.



Venue and accommodation



The Westin Perth

480 Hay Street, Perth

Our conference venue is located on Hay Street in Perth, with unparalleled connectivity to the best dining, tourism experiences and transport routes. The Westin Perth is a rejuvenating haven with luxury accommodation, 5-star amenities, world-class food and beverage outlets and elegant meeting and event venues. Located in stunning Hibernian Place, enjoy our six pillars of wellbeing under the renowned Westin® brand.

Getting there

Entry to the Westin Perth is via Hay Street.

Westin Perth is 20 minutes from the International and Domestic Airports, and a short walk from Perth Bus Station, Elizabeth Quay and Perth Train Stations.

Visit <https://www.transperth.wa.gov.au/Journey-Planner> for more information.

Accommodation

Favourable room rates have been negotiated and secured at the conference venue. Accommodation bookings can be made directly with the Westin Perth [here](#).

Please note that as per hotel booking conditions, accommodation may be 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.

Getting around

For our interstate delegates to the Conference, there are a variety of nearby locations worth a visit during your stay or if you decide to stay a little longer for the weekend. Kings Park, Swan River, The Art Gallery and Museum of Western Australia and Fremantle are great spots to visit.



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 10 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

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

Delegate list

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

Dress code

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

Special dietary and accessibility requirements

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

Networking function

A networking function will be held on Thursday from 5:15pm at the Westin Perth. The 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	Conference welcome reception and networking*
Full registration This registration option entitles one delegate to attend the entire event.	✓✓	✓✓	✓✓

*Additional tickets to the Welcome reception and convention dinner can be purchased on the registration form.

Discounts

Early bird registration

All registrations received and paid on or before Friday, 25 October 2024 will be entitled to an early bird discount.

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

Group discounts

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


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

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 15 for registration inclusions.

Full registration – 10 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before 25 October 2024	<input type="checkbox"/> \$1,800	<input type="checkbox"/> \$2,190	<input type="checkbox"/> \$2,100
Standard registration Register after 25 October 2024	<input type="checkbox"/> \$2,000	<input type="checkbox"/> \$2,390	<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 21 November at The Westin Perth

- 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 over \$220 on Affiliate membership for the first 12 months
- access member-only prices to this and future events
- access all member-only technical resources.

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

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 conference:

Thursday, 21 November 2024

11.30am-12.15pm Session 3A: BEPS Pillar Two – The saga continues

Session 3B: R&D & government grant funding

12.15pm-1.00pm Session 4A: PRRT – Recent developments

Session 4B: M&A update session

2.00-2:45pm Session 5A: Tax technology and ERP implementation

Session 5B: From farm-in to carbon farming

4 Payment summary

Registration fees \$

Additional guest tickets – Networking function (\$80) \$

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

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To register

Email customeradmin@taxinstitute.com.au

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au

Join the conversation

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