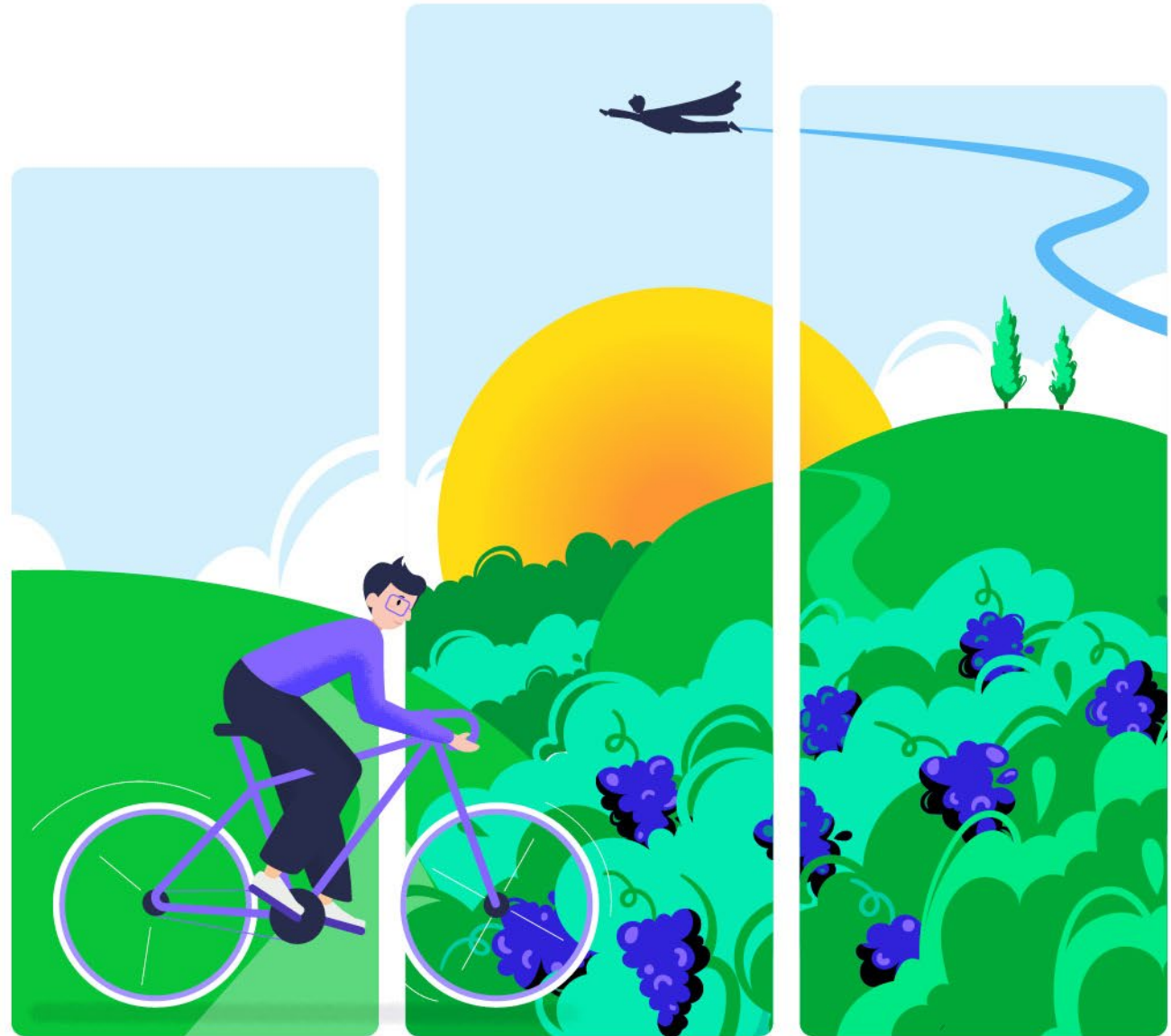


# Barossa Convention

**7-9 August 2024**

**Novotel Barossa Valley Resort**

**13 CPD hours**



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

Jessica Pengelly, CTA, HWL Ebsworth Lawyers (Chair, Barossa Convention Organising Committee)

Adrian Cartland, Cartland Law

Briony Hutchens, CTA, Finlaysons

Daniel Marateo, Cowell Clarke

Lisa Christo, NDA Law

Neil, Oakes, CTA, Perks

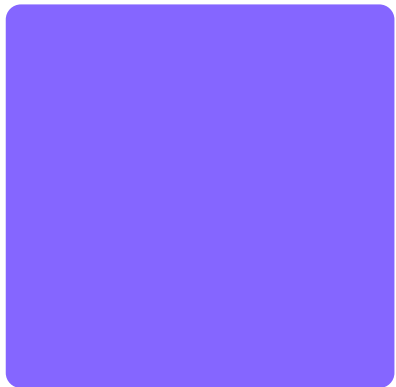
Nicole Peterson, CTA, PKF Adelaide

Sally Storey, CTA, Brentnalls

Sonia Mascolo, CTA, Bentleys

Nick Wilkins, CTA, Wilkins Advisory

## Proudly supported by:





# Welcome

## Tax Conquest: Heroes United

I'm delighted to invite you to join us in the beautiful setting of the historic Barossa Valley for The Tax Institute's Barossa Convention. This gathering holds a distinguished legacy, establishing itself as the foremost event in South Australia for tax professionals specialising in the SME sector.

In the realm of taxation, every day is a battleground, and this year, we embrace the theme of '*Heroes and Villains*'. So, gear up and prepare to embark on a quest through the Barossa Convention! Each session we aim to 'level up' your skills by taking you through the challenges emerging in daily practice, with victories to be found not only in enhanced knowledge but the potential to accumulate an additional 13 of CPD points.

I would also like to take this opportunity to express gratitude to all our speakers for their generous commitment in volunteering their time to share their expertise.

## High quality program

The Convention Organising Committee has curated a diverse lineup of esteemed presenters from various sectors of the profession, ensuring top-tier technical sessions. Attendees can expect a wealth of valuable insights, practical examples, and strategic tips presented in various formats, including panels, case study and technical sessions covering a spectrum of hot topics such as Part IVA, estate planning, tax planning with unit trusts and trust splitting. Moreover, attendees will gain crucial insights into the recent significant developments in the R&D provisions over the past 18 months. They'll also receive guidance on advocating for their clients with revenue authorities, alongside a plethora of other pertinent sessions awaiting exploration at the convention.

## Unique industry networking and idyllic destination

This year, we're excited to announce our return to the Novotel Barossa Valley Resort. Join us on Wednesday evening for a lively night of trivia and networking. Additionally, don't miss the opportunity to mingle with fellow delegates at our Convention dinner hosted at Peter Lehmann winery. The Barossa Valley provides an ideal backdrop for reconnecting with friends and colleagues from various fields including accounting, law, financial services, and regulatory bodies. While you're here, take the time to discover the hidden treasures of the region's cellar doors. Extend your stay in the Barossa Valley or explore the multitude of attractions South Australia has to offer. Whether it's indulging in food and wine tours or engaging in thrilling activities such as hot air ballooning, cycling, golf, and more, there's something for everyone to relish.

Don't hesitate - book now to take up early bird registration offers and secure your ticket to the Barossa.

I eagerly await welcoming you to the convention, where heroes unite to conquer challenges and forge a path towards greatness!

## Early bird pricing offer

**Register on or before Friday, 12 July 2024 to save!**



**Jessica Pengelly, CTA**  
Chair, Barossa Convention Organising Committee

# Technical program

**Day 1**      Wednesday, 7 August 2024

Time AEST	Session
From 6:45pm	Registration
7:00-9:00pm	Welcome reception



## Welcome reception

Is it a bird? Is it a plane? No it's the Barossa Convention Welcome Reception! Let the battle begin and join us for an evening of beverages and canapes while mingling with your fellow delegates and our esteemed speakers.

**Date:** Wednesday, 7 August 2024

**Time:** 7:00-9:00pm

**Venue:** Novotel Barossa Valley Resort

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

**Dress:** Business casual

Proudly sponsored by:





# Technical program

## Day 2 Thursday, 8 August 2024

Time AEST	Session
8:00 – 8:30am	Registration
8:30-8:45am	<b>Welcome and President’s Address</b> Speakers: Jessica Pengelly, CTA, Chair, Convention Organising Committee, Todd Want, CTA, President, The Tax Institute
8:45 – 9:45am	<b>Session 1: Unit trusts ... Look closer</b> Speaker: Peter Slegers, CTA, Cowell Clarke  Unit trusts have a wide application in commerce, particularly in the property sector, offering the flexibility of a trust structure but with the certainty more typically found in corporate structures.  This session will briefly revisit the fundamentals of dealings in private units trusts before delving into some overlooked issues. Topics will include: <ul style="list-style-type: none"><li>• Fixed vs non-fixed unit trusts – when is a fixed entitlement required and why does it matter?</li><li>• Unit redemptions or advancements of capital – CGT Event C2 versus E4 tax outcomes</li><li>• Planning issues concerning CGT Event E4</li><li>• Creation of interim entitlements prior to 30 June; and</li><li>• What to look for in the trust deed.</li></ul>
9:45 – 10:30am	<b>Session 2: The latest in Tax Policy and Advocacy</b> Speaker: Robyn Jacobson, CTA, The Tax Institute  A discussion on the key tax policy and administration issues currently impacting the profession and the work The Tax Institute is undertaking in this regard. The session will explain our current engagement with government and other key stakeholders and will cover: <ul style="list-style-type: none"><li>• The status of the key measures announced as part of the Federal Budget 2024-25</li><li>• Recently enacted and pending measures in our sights</li><li>• The latest on the Federal Court appeal in <i>Bendel and Commissioner of Taxation</i> [2023] AATA 3074</li><li>• Key superannuation measures including Division 296 and Payday super</li><li>• Agents’ new obligations under the <i>Tax Agent Services Act 2009</i>; and</li><li>• Topical ATO administrative processes.</li></ul>
10:30 – 11:00am	Morning tea

# Technical program

**Day 2** Thursday, 8 August 2024 continued

Time AEST	Session
11:00–12:00pm	<p><b>Session 3: My spidey sense is tingling – Navigating the Part IVA web</b> Speaker: Sylvia Villios, CTA, University of Adelaide</p> <p>This session explores the complexities of Part IVA of the Income Tax Assessment Act 1936 (Cth), tracing its evolution from its legislative origins to recent judicial interpretations. Special attention will be given to two recent cases: <i>Commissioner of Taxation v Guardian AIT Pty Ltd ATF Australian Investment Trust</i> [2023] FCAFC 3 and <i>Minerva Financial Group Pty Ltd v Commissioner of Taxation</i> [2024] FCAFC 28. These cases are particularly significant as they mark the first judicial considerations of Part IVA post the 2013 amendments.</p> <p>The discussion will focus on the practical implications of these amendments, including whether a determination of two alternative postulates is now required, the ongoing viability of the “do nothing” argument, and the extent to which Part IVA has significantly increased in power.</p> <p>This session aims to provide a thorough understanding of Part IVA’s current landscape and its impact on tax law and compliance strategies.</p>
12:00–12:45pm	<p><b>Session 4: Simplified transfer pricing for the everyday tax advisor</b> Speaker: Simon How, CTA, Bentleys</p> <p>Your SME client is subject to due diligence and you, as their advisor, are asked to show that all international related party dealings have been assessed and documented under transfer pricing principles. How do make sure your client can respond positively to this request whilst managing the cost of preparing transfer pricing reports and benchmarking studies?</p> <p>This session will help you assist your SME client with managing their transfer pricing risks with related party transactions. In particular, it will help you:</p> <ul style="list-style-type: none"><li>• Understand transactions and structures which are subject to transfer pricing risk which you need to manage</li><li>• Understand the ATO transfer pricing methodology in simple terms and the work involved for the client to prepare acceptable documentation</li><li>• Understand the ATO documentation safe harbours, what they mean for your client’s group and when they should be applied</li><li>• Identify the specific issues with cross-border intangibles and how to manage the pricing risk between jurisdictions</li><li>• What to do when your client is part of an SGE group; and</li><li>• When and how to engage with specialist transfer pricing advisors to manage your client’s risk.</li></ul>
12:45–1:45pm	<b>Lunch</b>

# Technical program

**Day 2** Thursday, 8 August 2024 continued

Time AEST	Session
12:45-1:45pm	Lunch
1:45 – 3:15pm	<p><b>Session 5: 10 Things I hate about your trust distribution</b> Speakers: Adrian Cartland, Cartland Law, Sally Storey, CTA, Brentnalls</p> <p>Trust distributions are part of the administrative routine for the hundreds of thousands of trusts in Australia. But trust distribution resolutions are more than a template document to be recycled each year. They are a deceptively simple document that deals with a complex legislative scheme that sits atop an amorphous and arcane equity law. Advisors may be called to draft resolutions that deal with issues such as:</p> <ul style="list-style-type: none"><li>• Distributing income and capital of different types to different beneficiaries</li><li>• Utilising different types of income (accounting vs S95) and navigating trust losses</li><li>• Ensuring that an amount is properly paid, applied or set aside</li><li>• Creating present entitlement to income or assets under problematic old trust deeds, unclear equitable rights and obligations, and changing ATO views</li><li>• Distributions of matters that are:<ul style="list-style-type: none"><li>– difficult to identify (eg shares, money and other fungibles)</li><li>– not property (eg income – see Bendel – or cryptocurrency)</li><li>– not divisible at law as they might be for tax (eg CGT assets)</li></ul></li><li>• The presentation will be a mix of both law and accounting, of theory and practical examples, and of (deidentified) real life failures and guidance on how not to make those same failures in your own trust distributions.</li></ul>
3:15 – 3:45pm	Afternoon tea
3:45 – 4:30pm	<p><b>Session 6: Advocacy on your client’s behalf with revenue authorities – Superman or Clark Kent?</b> Speaker: Sam Ure, FTI, VIC Bar</p> <p>A premise of modern advocacy training is that good advocacy is based more on learned skills and hard work than talents or superpowers. This session will suggest practical ways to employ the techniques learned and practised by professional advocates when dealing with revenue authorities in reviews, audits, objections, negotiations and beyond. It will cover:</p> <ul style="list-style-type: none"><li>• Structuring the team and managing client expectations</li><li>• Gathering and presenting evidence</li><li>• Techniques for persuasive written advocacy; and</li><li>• Preparing for negotiations and ADR processes.</li></ul>

# Technical program

**Day 2** Thursday, 8 August 2024 *continued*

Time AEST	Session
4:30 – 6:30pm	Free time
6:30pm	Bus departs for dinner
7:00 – 10:00pm	Convention dinner
10:00pm	Bus departs for Novotel Barossa Valley Resort



## Convention dinner

**Channel your inner hero or succumb to your villainous side with your favourite cape or mask!**

Join your colleagues, peers and our esteemed presenters for an evening of fine dining and networking. Held at Old Redemption Cellar located in the picturesque location, with sweeping views over the rolling lawns and native gum trees at Peter Lehmann Winery.

**Date:** Thursday, 8 August 2024

**Time:** 7:00–10:00pm

**Venue:** Old Redemption Cellar at Peter Lehmann Winery

**Price:** Inclusive for all full registration delegates  
Additional tickets are \$200 per person, see registration form for details

**Dress:** Cocktail



# Technical program

## Day 3 Friday, 9 August 2024

Time AEST	Session
8:30 – 9:30am	<p><b>Session 7: Trust splitting – Dead or alive?</b> Speaker: Michael Butler, CTA, Finlayson</p> <p>In this session Michael Butler will cover:</p> <ul style="list-style-type: none"><li>• Difference between trust splitting and trust cloning</li><li>• Reasons for, and circumstances when it may be worth considering, using a trust split</li><li>• Tax implications of appointing separate trustees over specific trust assets</li><li>• ATO position on trust splitting in TD 2019/14 and difference between “good” and “bad” splits</li><li>• Possible use of Corporate Trustee Shareholder Deed</li><li>• Possible use of CGT roll-overs and reliefs in ITAA 1997, Divs. 152 and 328-G; and</li><li>• Possible use of asset revaluation reserves (ARRs) and <i>Fischer v Nemeske Pty Ltd</i> (High Court).</li></ul>
9:30 – 10:15am	<p><b>Session 8: New battlegrounds in payroll tax disputes</b> Speaker: Jessica Pengelly, CTA, HWL Ebsworth Lawyers</p> <p>Over the last few years there has been a noticeable increase in audit and review activity in the area of payroll tax compliance. Distinct trends have emerged regarding focus areas for revenue authorities, with the recent Revenue Ruling PTA041 highlighting one of RevenueSA’s focus areas, concerning medical centre structures. The ruling has a broad application and is not limited purely to GP medical practices, but can apply to a broad range of entities providing services in the healthcare sector. A number of other industry groups, including those in the not-for-profit sector, are coming under increased scrutiny from RevenueSA.</p> <p>This session will identify those emerging trends and current hot spots for payroll tax reviews, and steps clients can take to ensure they are well-equipped should they find themselves called to battle.</p>
10:15 – 10:45am	<b>Morning tea</b>
10:45am – 12:15pm	<p><b>Session 9: “Beware of the Dragon” – Estate and structure considerations to avoid a succession fire</b> Speakers: Alexandra Nicola, Thomson Geer Lawyers, Nicole Peterson, CTA, PKF Adelaide</p> <p>A practical case study driven presentation on the importance of structuring for your estate plan including battle stories from lawyers, accountants and independent trustees and advice on how to spot and defeat the dragons hiding in your estate.</p> <p>This presentation will cover:</p> <ul style="list-style-type: none"><li>• The importance of a fact-find and having the necessary documents to facilitate a clean succession plan including case studies and example summaries</li><li>• Considerations for this generation and the next generation</li><li>• The extension of your estate plan from your individual (personal assets) to your companies and trusts; and</li><li>• Succession of control of your entities including independent trustees (planned or unplanned).</li></ul>

# Technical program

**Day 3** Friday, 9 August 2024 continued

Time AEST	Session
12:15–1:00pm	Lunch
1:00–1:45pm	<p><b>Session 10: Research and Development</b> Speaker: Brett Zimmermann, CTA, Australian Taxation Office</p> <p>The last 18 months have been significant to the development of the law underpinning the R&amp;D provisions. Recent Court and Tribunal decisions (several of which in the agribusiness sector) have provided taxpayers, the Commissioner and DISR with a more precise understanding of how the R&amp;D provisions are to be interpreted. This session will examine the following topics from the perspective of Brett Zimmermann, Assistant Commissioner, Tax Counsel Network with technical responsibility for the ATO's significant R&amp;D litigation and Taxpayer Alerts.</p> <ul style="list-style-type: none"><li>• The decision in GQHC and Commissioner of Taxation – circumstances when the Commissioner may put R&amp;D eligibility in dispute and feedstock in primary production.</li><li>• Discussion of other recent tax R&amp;D cases – TDS Biz and Sunlite</li><li>• Taxpayer Alert TA 2023/4 and R&amp;D expenditure incurred to an associate</li><li>• Taxpayer Alert TA 2023/5 R &amp; D and expenditure on R&amp;D activities conducted overseas for a foreign entity</li><li>• R&amp;D Transparency measure; and</li><li>• Governance and risks with R&amp;D claims.</li></ul>
1:45–2:45pm	<p><b>Session 11: Navigating the GST maze – Essential insights for property developers?</b> Speaker: Anna Chong, CTA, KPMG</p> <p>Applying GST to transactions relating to property development can be difficult at the best of times and many clients do not consider this major expense in the budgeting and planning for property developments. GST on property developments doesn't just impact large-scale developers but it can also apply to unsuspecting smaller-scale activities. Anna will help you be the hero by ensuring that your clients aren't at risk of an unexpected GST surprise. This session will consider the key GST issues that may result in property development.</p> <ul style="list-style-type: none"><li>• Margin Scheme</li><li>• Change in creditable purpose</li><li>• Mum and dad development what can go wrong</li><li>• Registered or required to be registered; and</li><li>• GST withholding at settlement.</li></ul>
2:45–3:00pm	Afternoon tea

# Technical program

**Day 3** Friday, 9 August 2024 continued

Time AEST	Session
3:00–4:00pm	<p><b>Session 12: Unmasking the tax heroes and villains of employment departures – Panel session</b> Speakers: Matt Brittingham, CTA, Tributum Law, Will Snow, Snow Legal</p> <p>As more and more people leave their employment, advisors are required to understand and deal with negotiated employment settlements. Where emotions can be high, parties often negotiate benefits and financial outcomes in pursuance of balancing party interests, without any thought for the potential tax consequences. This insightful panel session will explore the intricate world of employment exits and their tax consequences. It will cover:</p> <ul style="list-style-type: none"><li>• The true meaning of a genuine redundancy</li><li>• Common negotiated outcomes of employment exits</li><li>• The tax consequences of employment exits; and</li><li>• General risks to be identified before an employment exit is finalised.</li></ul>
4:00–5:00pm	<p><b>Session 13: Jumping the ditch – Not landing in it</b> Speaker: David W Marks KC, CTA, QLD Bar</p> <p>Our clients frown at the automatic gate in Auckland, the gate swings open, and they think they are just in an extended bit of Australia. This session will discuss:</p> <ul style="list-style-type: none"><li>• The new 39% trust tax rate</li><li>• Cross-border estates – avoiding pitfalls, gaining the 33% rate</li><li>• Whether standard Australian tax structuring translates to New Zealand; and</li><li>• Resolving double-taxation issues.</li></ul>
5:00pm	<b>Closing address</b>



# Presenters

**Mathew Brittingham, CTA**, is the Managing Director of Tributum Law, as specialist tax & trusts law advisory firm. Mathew's broad expertise includes advising on tax avoidance, international tax, tax structuring and complex trust law issues. Mathew is also regularly called on to act for taxpayers in disputes with the ATO and State Revenue Offices, and routinely assists to resolve audits with these authorities. Mathew is consistently recognised as an industry leader in lawyer rating guides and Australian wide awards in the tax law field.

**Michael Butler, CTA**, is the Partner in charge of the Finlaysons Tax & Revenue Group. Michael advises domestic and foreign clients on federal, international and state tax matters, and has a special interest in corporate restructurings, cross-border investment, property, wine and mining taxation, trusts, and estate and succession planning. Michael is a past chair of The Tax Institute's South Australia State Council and a regular contributor to Institute events.

**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 AI. 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. He used some of the material in this bio to meet his wife on Tinder, and has asked for the remainder to be added

to his eulogy if he is ever (accidentally) brutally dispatched (by her).

**Anna Chong, CTA**, is Head of Indirect Tax leading the KPMG Enterprise Indirect Tax practice. She specialises in GST, Stamp Duty, Land Tax, Fuel Tax Credit and Wine Equalisation Tax with over 20 years of experience in providing indirect tax advisory and compliance services. Her practice covers a wide range of industry sectors from HNWIs and private clients to top ASX 200 companies and government agencies on financial services, infrastructure projects, property developments, cross broader transactions, mergers and acquisitions, and GST and Fuel tax compliance affairs. Anna is currently a member of Tax Committee of Australia Property council (SA) and National GST Technical Committee of The Tax Institute.

**Simon How, CTA**, is a tax consulting partner at Bentleys SA, chair of the Bentleys national tax group and a lead Australian tax partner for the Global Allinial network. Simon provides specialist taxation advice with a focus on clients in the SME & International market. Simon regularly works as part of a global team of Allinial tax advisors to deliver a integrated tax solution for multinational clients operating in Australia. Simon has over

26 years experience in public practice and with the ATO.

**Robyn Jacobson, CTA**, is the Senior Advocate at The Tax Institute. She has more than three decades in the profession, including a public practice background that preceded her various training roles over 23 years. A regular conference and webinar presenter, Robyn is also an avid advocate, social media commentator, columnist and blogger, and hosts The Tax Institute's TaxVibe podcast. She is frequently quoted in the media. Robyn is a Chartered Tax Adviser of The Tax Institute, a Fellow of both CA ANZ and CPA Australia, and a Registered Tax Agent. She regularly consults with the Treasury, ATO and professional associations on technical issues including as Co-Chair of the ATO's Tax Practitioner Stewardship Group and a member of various other working groups. Robyn has been recognised as a Thought Leader five times over four consecutive years (2019-2022) as Winner of this category across the Women In Finance Awards and the Australian Accounting Awards. Robyn was the Winner of the Accountants Daily Excellence Award 2020 and was named in the global Top 50 Women in Accounting 2019.

# Presenters

**David Marks KC, CTA**, is a commercial Silk at the Queensland Bar practising principally in tax. He has a broader practice in commercial litigation, trusts and estates, and administrative law. He contributes to the life of the profession through his committee work for The Tax Institute and other professional bodies. He is a Chartered Tax Adviser and a registered Trust and Estates Practitioner. He received The Tax Institute's Meritorious Service Award in 2013, and is on TTI's Editorial Board. David also serves on the disciplinary panel of an international practitioner association.

**Alexandra Nicola** is a Senior Associate in the tax team at Thomson Geer Lawyers. She specialises in complex taxation, superannuation and estate planning matters. Alexandra has particular expertise in income tax law (including CGT), GST and stamp duty, structure reviews and restructuring as well as estate and succession planning for individuals and businesses.

**Jessica Pengelly, CTA**, is a Special Counsel in HWL Ebsworth's Tax Group in Adelaide. Jessica has over 10 years' experience in tax and

revenue law, and practices across a broad range of taxation and revenue law areas including income tax, GST, Wine Equalisation Tax (WET), excise, stamp duty and payroll tax. Prior to joining HWL Ebsworth, Jessica worked for the ATO and was part of the ATO's Tax Counsel Network. Jessica has a particular interest in tax and revenue litigation and dispute resolution, international tax, indirect taxes and state taxes. Jessica has extensive experience assisting clients with payroll tax audits and successfully negotiating with revenue authorities in payroll tax disputes.

**Nicole Peterson, CTA**, has worked at PKF Adelaide for over two decades where she is involved with the various specialities PKF Australia provides. Early on Nicole developed a strong interest and now specialises in the areas of complex family structures and in particular the impacts of Division 7A, small business CGT concessions, structuring and compliance. Nicole's priority is delivering taxation services and associated advice to add value and go beyond compliance. She has developed diverse technical expertise, to assist in structuring and succession

planning advice. In addition, Nicole has numerous court appointed independent trustee and protected estate manager roles.

**Peter Slegers, CTA**, heads Cowell Clarke's Tax & Revenue, Superannuation and Private Client practice groups. Peter advises and acts for a wide range of public and private companies and high net worth individuals and families. Peter's areas of expertise include income tax (as it impacts on business and high net worth clients), capital gains tax, goods and services tax, state taxes, trust law and superannuation law. Peter has published numerous papers on trust structures and has considerable experience in this area. Peter is also a co-author of the Tax Institute's SMSF Income Stream Guide and Cowell Clarke's Australian Agribusiness Advisers' Guide.

**Will Snow** is an employment lawyer who acts for companies and executives in negotiating the ending of employment (among other things). Previously working at national firms and in-house roles at an ASX listed company and State Government utility, he now heads up Snow Legal, a boutique

employment and safety practice with a growing team of lawyers with their poodle cross-breeds. His favourite hero / villain combination is Batman and the Joker and his own personality oscillates between the two.

**Sally Storey, CTA**, is passionate about helping her clients grow and protect their wealth, and achieve financial freedom. Sally is a Fellow of Chartered Accountants Australia and New Zealand and holds a Masters in Applied Taxation. With 20 years' experience in all areas of accounting, taxation and business advisory services, Sally has helped many clients navigate the ups and downs of their business and personal finance journeys.

**Sam Ure, FTI**, has an established reputation as a leading junior counsel in tax, and maintains a practice in Adelaide and Melbourne. Sam has appeared in numerous State and Federal tax cases in superior courts and in the Administrative Appeals Tribunal. He has advised both taxpayers and revenue authorities in many reviews and audits. Sam also practises in commercial disputes, administrative law and regulatory proceedings.



# Presenters

**Dr Sylvia Villios, CTA**, is an Associate Professor at the Adelaide Law School, University of Adelaide. She researches and teaches in taxation law, particularly focusing on questions about the operation of the Australian tax system, taxation policy, corporate taxation and the role, powers and accountability of the Commissioner of Taxation. Outside of her primary research area, she has published extensively on the role and operation of Australia's succession laws. Dr Villios is the Associate Dean of Graduate Studies for the Faculty of Arts, Business, Law and Economics. She is a co-director of the Regulation of Commercial, Corporations, Insolvency and Taxation (ROCCIT) research unit which is based at the University of Adelaide. She is an editorial panel member of the Australian Tax Law Bulletin, Lexis Nexis. During her academic career she has published over 35 peer-reviewed journal articles. She has a strong industry presence and her background in taxation and commercial law extends beyond academia and includes experience in legal practice.

**Brett Zimmermann, CTA**, is an Assistant Commissioner in Tax Counsel Network (TCN) responsible for providing leadership on technical issues that are a priority for the ATO. Brett joined the ATO five years ago, prior to that working 18 years in the private sector as a specialist tax and commercial solicitor. Brett holds a range of roles in the ATO and deals with issues during audit, advice products, litigation and legislative development with a focus on corporate transactions. His recent work includes matters pertaining to current R&D, share capital management and earnout portfolios. Brett was the TCN Assistant Commissioner with technical responsibility for the GQHC, Sunlite and TDS Biz litigation matters.



# Venue and accommodation



## Novotel Barossa Valley Resort

42 Pioneer Avenue, Rowland Flat, Barossa Valley

The Novotel Barossa Valley Resort located in the Barossa Valley district, is set in a natural amphitheatre overlooking Jacob's Creek. The guest rooms all feature private balconies and views of the Barossa Ranges. Both comfort and functionality are assured with iPod docking stations, connecting directly to 32-inch LCD TVs, pay TV channels, in-house movies, comfortable workstations, including ergonomic chairs and broadband access, a large chaise lounge to stretch out on and individually controlled air-conditioning.

An accommodation block has been reserved for delegates at the Novotel Barossa Valley Resort. Favourable room rates have been negotiated and room rates are quoted on a per-person, per-night basis (inclusive of GST) and include breakfast. These favourable room rates have been extended from Tuesday (6 August) to Friday (9 August).

**Rooms are limited and must be booked prior to 6 July 2024.** All accommodation bookings must be made directly with the venue via the [self-book weblink here](#).

For alternative accommodation arrangements, please contact the Barossa Wine and Tourism Association on 1300 852 982 or visit the website <https://www.barossa.com/>.

## Getting to the Novotel Barossa Valley Resort

The resort is located at 42 Pioneer Avenue, Rowland Flat, Barossa Valley. It is 85 kilometres (75-minute drive) from the Adelaide CBD and Adelaide Airport. The venue provides free on-site parking for guests. Car hire is readily available at Adelaide Airport and we encourage you to book when registering for this event.

## Endota Spa

Immerse yourself in down-to-earth pampering at the Novotel Barossa Valley Resort's own Endota Spa. Offering unparalleled relaxation, indulge in a range of spa experiences for your body, face, soul and mind, just a stone's throw away from your room. Bookings in advance on 08 8524 0071 or [barossavalley@endota.com.au](mailto:barossavalley@endota.com.au) are recommended to avoid disappointment.

## Golf at the Tanunda Pines Clubhouse

Golf at the Tanunda Pines Clubhouse is just a two-minute stroll from the resort. This world-class golf course is a stunning 18-hole, par-72 course with 100-year-old gum trees lining fairways that undulate across the hilltops of the Barossa Ranges and it just a two-minute stroll from the resort. It is available either pre, during or post-convention. Contact the club direct on 08 8563 1200 to make your individual or group booking, with golf clubs and motorised golf carts available for hire. Bookings in advance are recommended to avoid any disappointment.

## The Tasting Room

For those that are unable to go out and visit one of the 170 wineries in the Barossa, we will bring the Barossa to you! The Tasting Room offers complimentary wine tasting featuring a different winery every Thursday, Friday and Saturday. A wide range of wonderful Barossa products are also available for purchase at any time.



# Event information

## Welcome reception | Wednesday, 7 August 2024

The Welcome reception is included in the registration fee for delegates attending the full Convention. The Welcome Reception includes stand up dinner and drinks. Join us for an evening of networking and a showcase of Barossa's best food and wine.

## Convention dinner | Thursday, 8 August 2024

It's here, the night where *'Heroes and Villains'* unites at the Barossa Convention dinner.

Held at Old Redemption Cellar located in the picturesque location, with sweeping views over the rolling lawns and native gum trees at Peter Lehmann Winery. Celebrate the achievements of members in the local Tax Community with an evening of fine-dining, networking and of course wine.

Dress to impress and make an entrance, with black-tie optional, this unforgettable event is included in the registration fee for delegates attending the full convention.

## Continuing Professional Development

Attendance at the Convention counts for 13 hours of Continuing Professional Development 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 Convention.

## Special dietary and accessibility requirements

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

## Cancellation Policy

The Tax Institute reserves the right to alter, amend or cancel 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.

If a registered delegate is unable to attend as a result of a diagnosis of COVID-19 or they are experiencing symptoms of COVID-19, a full refund will be offered with the provision that a medical certificate is produced explaining the diagnosis or a summary of the appropriate action to be taken i.e. a COVID-19 test and medical advice.

## Privacy

We take your privacy seriously, and our policy can be viewed at: [www.taxinstitute.com.au/privacypolicy](http://www.taxinstitute.com.au/privacypolicy)

## Enquiries

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

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



# Registration

## Registration inclusions

	Online access to presentations and technical papers	Morning/ afternoon tea/ convention lunches	Welcome reception and convention dinner*
<b>Full registration</b> 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

### Registration inclusions

Full convention registration includes participation in the full technical program, electronic access to all available materials via the Barossa Convention Virtual Attendee Hub, attendance at the Wednesday Welcome Reception and Thursday Convention Dinner and all refreshments during convention hours. Registration fees do not include travel, accommodation, or hotel incidentals.

### Early bird registration

All registrations received and paid on or before Friday, 12 July 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](mailto:nationalevents@taxinstitute.com.au).

### 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.

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 – 13 CPD hours

	Member	New member*	Non-member
<b>Early bird registration</b> Register on or before Friday, 12 July 2024	<input type="checkbox"/> \$1,700	<input type="checkbox"/> \$2,090	<input type="checkbox"/> \$2,000
<b>Standard registration</b> Register after Friday, 12 July 2024	<input type="checkbox"/> \$1,900	<input type="checkbox"/> \$2,290	<input type="checkbox"/> \$2,200

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

### Welcome reception

The Welcome Reception is INCLUDED in the registration fee for delegates attending the full Convention.

#### Wednesday, 7 August: Novotel Barossa Valley Resort

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

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

Dietary requirements:

### Convention dinner

The Convention dinner is INCLUDED in the registration fee for delegates attending the full Convention.

#### Thursday, 9 August: Old Redemption Cellar at Peter Lehmann Winery

- Yes, I WILL be attending the Convention dinner OR  
 No, I WILL NOT be attending the Convention dinner  
 Yes, I require additional tickets for the retreat dinner at \$200 per person

No.  x tickets at \$200 each: \$

Dietary requirements:

## 2 Delegate contact details

Member no.:

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

Title:  Mr  Mrs  Miss  Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb:  State:  Postcode:

Telephone:  Mobile:

Email:

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

### \*Become a member and save!

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

- save over \$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](http://taxinstitute.com.au/membership)

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

Signature:

Date of signature:

**JOIN TODAY**



### 3 Payment summary

Registration fees	\$	<input type="text"/>
Additional guest tickets – Welcome reception (\$80)	\$	<input type="text"/>
Additional guest tickets – Convention dinner (\$200 each)	\$	<input type="text"/>
<b>Total payable</b>	\$	<input type="text"/>

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

### 4 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](http://taxinstitute.com.au/professional-development/event-policy).

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

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

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





**To register**

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

Mail L37, 100 Miller Street North Sydney NSW 2060

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

Join the conversation

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

