

# Financial Services Taxation Conference

**27 – 28 March 2025**

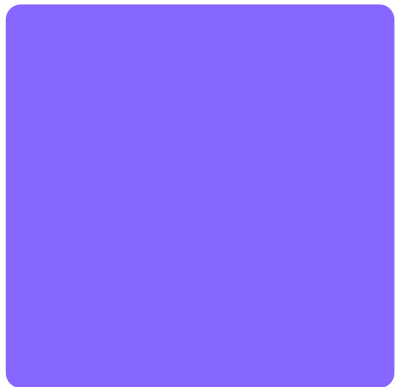
**Crown Sydney**

**12 CPD hours**



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

Matt Osmond, CTA,  
Chair, Organising Committee  
Michael Anderson, BDO  
Michele Carmody, Colonial First State  
Siew-Kee Chen, Deloitte  
Antony Faisandier, Australian Taxation Office  
Simon Jenner, CTA, EY  
Jason King, CTA  
Peter Nearhos, CTA, PwC  
Sarah Pang, IAG  
Michael Potter, Commonwealth Bank  
John Salvaris, CTA, KPMG  
Michelle Siu, Aware Super  
Nicole Stratford, Barrenjoey  
Steve Whittington, Ashurst





# Welcome

On behalf of The Tax Institute and the Organising Committee, it gives me great pleasure to invite you to attend the Financial Services Taxation Conference, the leading conference for financial services taxation professionals in Australia, to be held from 27–28 March 2025 at Crown Sydney.

The financial services industry is facing increased regulatory compliance, technological disruption, economic headwinds, geopolitical changes and a range of ESG reporting obligations. These industry issues overlay a number of tax challenges for taxpayers which impact financial and business strategy, and compliance and reporting obligations.

The Organising Committee has once again designed an amazing program that highlights the most important topics facing financial services taxation professionals in Australia and has invited some of our best thought leaders from around Australia to deliver expert insights, experience and commentary at the Conference.

We will cover a range of tax technical, legal, accounting, policy, economic and political angles in the session content.

The program has plenary and breakout sessions that gives you a choice of sessions to best meet your industry and learning needs.

There will also be many opportunities to meet other financial services taxation professionals and network with friends, clients and colleagues.

I look forward to seeing you at the event.



**Matt Osmond, CTA**  
Chair, Conference Organising Committee

**Early bird pricing offer**  
**Register on or before Friday, 28 February 2025 to save!**

# Technical program

**Day 1** Thursday, 27 March 2025

Time *AEDT	Session
8:00–9:00am	Registration
9:00–9:30am	<p>Welcome and President’s address</p> <p>Speakers: Matt Osmond, CTA, Chair, Financial Services Taxation Conference Organising Committee together with the 2025 President of The Tax Institute.</p>
9:30–10:30am	Session 1: Keynote address – The future of financial services
10:30–11:00am	Morning tea
11:00am–12:00pm	<p>Session 2: Thin capitalisation – case studies and calculations</p> <p>Speaker: Julian Humphrey, CTA, KPMG</p> <p>This session will discuss key aspects of the new debt limitation rules for financial services businesses and workshop how to prepare calculations under the fixed ratio test and group ratio test. The session will include the calculation of elements of tax EBITDA, the group ratio, net debt deductions and the determination of whether a taxpayer remains a financial entity.</p>
12:00–1:00pm	<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p><b>Session 3A: Operational taxes</b></p> <p>Speaker: Jodie Bosler, State Street</p> <p>A practical session on the world of “operational tax” drawn from extensive “lived” experience, incorporating:</p> <ul style="list-style-type: none"> <li>• An industry overview – facts and figures</li> <li>• Operational Tax 101 – why, what, how, when, who?</li> <li>• ATO Guidance: Governance over third-party data – industry challenges</li> <li>• Tax and Technology – SWOT; and</li> <li>• Key tax risk areas – tips in time for FY25 year-end planning.</li> </ul> </div> <div style="width: 48%;"> <p><b>Session 3B: TOFA refresh and industry issues</b></p> <p>Speaker: Michael Anderson, BDO</p> <p>2025 marks the 15th anniversary of the mandatory commencement date of the TOFA rules.</p> <p>This session will:</p> <ul style="list-style-type: none"> <li>• Reflect on whether the TOFA rules have achieved their policy objectives</li> <li>• Provide a refresher on the application of the TOFA rules</li> <li>• Outline some practical examples of applying the TOFA rules in practice e.g. accruals calculations, aggregation of arrangements, novation of derivatives, portfolio hedging, NIFO hedging; and</li> <li>• Suggest areas where reform would reduce compliance costs and uncertainty.</li> </ul> </div> </div>
1:00–2:00pm	Lunch

# Technical program

**Day 1** Thursday, 27 March 2025 continued

Time *AEDT	Session
2:00 – 3:00pm	<p><b>Session 4A: Investing in US private credit</b> Speakers: Peter Oliver, CTA, KPMG and Vanessa Kasbekar, KPMG</p> <p>US private credit is a fast-growing asset class for Australian investors. This session will:</p> <ul style="list-style-type: none"><li>• Reflect and comment on the emergence of US private credit as an asset class for Australian investors</li><li>• Compare and contrast fund structures</li><li>• Outline key US and Australian income tax and withholding tax considerations</li><li>• Discuss hedging strategies and alignment of the tax character and tax timing of hedging gains and losses with underlying investments; and</li><li>• Comment on US tax policy matters.</li></ul>
	<p><b>Session 4B: Income tax and GST treatment of fees</b> Speakers: Brad Miller, EY and Kimberley Christy, EY</p> <p>Financial services business, customers and investors receive and pay a range of fees.</p> <p>This session will consider and discuss a variety of fees, including loan fees, broker fees, trail fees, and advisor fees and comment on:</p> <ul style="list-style-type: none"><li>• The income tax treatment of fees for businesses and customers, including recent ATO guidance on financial advice fees paid by individuals;</li><li>• The GST treatment of fees for businesses, including eligibility of superannuation funds and investor-directed portfolio services investment platforms to claim reduced input tax credits on adviser fees; and</li><li>• Contractual, compliance and governance considerations.</li></ul>
3:00 – 3:30pm	<b>Afternoon tea</b>
3:30 – 4:30pm	<p><b>Session 5A: Pillar Two workshop – key principles and calculations</b> Speakers: Angela Danieletto, CTA, PwC and Tony Chen, PwC</p> <p>The Pillar Two rules are proposed to apply for income years commencing on or after 1 January 2024.</p> <p>This session is a practical session on how to apply the Pillar Two rules and will outline:</p> <ul style="list-style-type: none"><li>• What is Pillar Two?</li><li>• How is Pillar Two being implemented in Australia?</li><li>• Who do the rules apply to?</li><li>• How do you prepare Pillar Two calculations? and</li><li>• What disclosures are required in financial statements?</li></ul>
	<p><b>Session 5B: FS M&amp;A update – private equity focus</b> Speaker: James Momsen, BDO</p> <p>Financial services providers have emerged as an attractive asset class for private equity over recent years.</p> <p>This session will consider:</p> <ul style="list-style-type: none"><li>• What is driving private equity investment in financial services</li><li>• What types of assets have been acquired and how they have performed</li><li>• Private equity fund structures</li><li>• Key income tax, transfer pricing and withholding tax considerations</li><li>• Recent issues emerging in tax due diligence and acquisition structuring; and</li><li>• Exit considerations</li></ul>

# Technical program

**Day 1** Thursday, 27 March 2025 continued

Time *AEDT	Session
4:30 – 5:30pm	<p><b>Session 6: Tax Cases and rulings update</b></p> <p><b>Speakers: Steve Whittington, Ashurst and Bronwyn Kirkwood, Ashurst</b></p> <p>This session will consider:</p> <ul style="list-style-type: none"><li>• Australian tax case law which has been determined in the Federal Court, Full Federal Court and High Court in 2024, including an analysis of the win-loss percentage</li><li>• Case law from other Commonwealth jurisdictions that is industry relevant and that may be persuasive in Australia; and</li><li>• Recent rulings or other guidance from the Australian Taxation Office that is of significance to the financial services industry.</li></ul>
5:30 – 7:30pm	<b>Networking Function</b>



## Networking Function

At the close of Day One, 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 27 March 2025

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

**Venue:** Crown Sydney

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

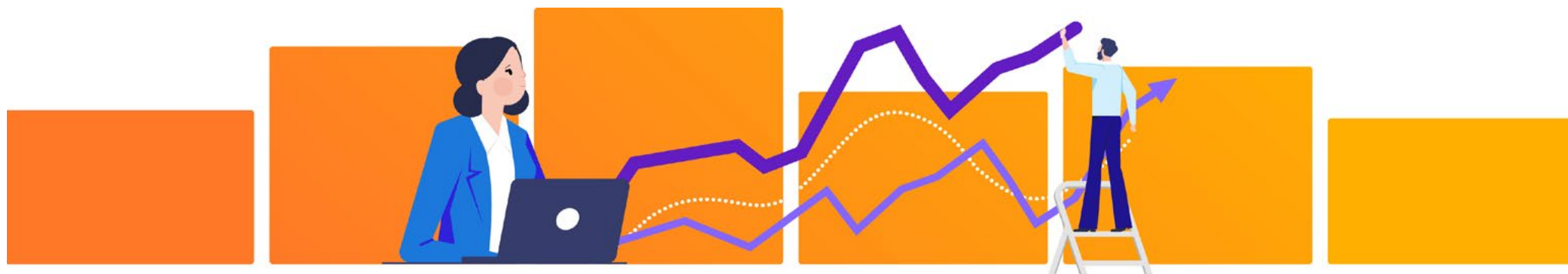
**Dress:** Business or business casual



# Technical program

**Day 2** Friday, 28 March 2025

Time *AEDT	Session
8:30 – 9:30am	<p><b>Session 7: Economics update</b> Speaker: Chelle Murphy, EY</p> <p>How is the Australian economy performing and tracking on key economic indicators? This session will address the key forces shaping the economy in 2025 / 2026 and the key trends for the years ahead.</p>
9:30 – 10:30am	<p><b>Session 8A: Tax treatment of intangible assets in financial services</b> Speakers: Cameron Blackwood, ATI, Corrs and Angelina Lagana, CTA, Corrs</p> <p>There are many intangible assets that can be created or acquired in financial services businesses, including software, management rights, contractual or non-contractual customer relationships, core deposit intangible assets and goodwill. The use of intangibles across borders has become a key risk area with the ATO dedicating resources to compliance activity in this space.</p> <p>This session will consider:</p> <ul style="list-style-type: none"><li>• The identification and characterisation of intangible assets for income tax purposes</li><li>• Tax consolidation and valuation considerations</li><li>• Whether assets are held on capital or revenue account</li><li>• The income tax treatment of payments made or received in respect of intangible assets</li><li>• Withholding tax considerations; and</li><li>• The ATO’s compliance activity [in light of the <i>PepsiCo</i> case, recent ATO guidance and proposed government measures].</li></ul>
	<p><b>Session 8B: Anti-avoidance regimes in Australian tax law</b> Speaker: Daniel McInerney KC, Victorian Bar</p> <p>Most tax practitioners will be familiar with the general anti-avoidance rule in Part IVA of the <i>Income Tax Assessment Act 1936</i>.</p> <p>However, there are a myriad of other anti-avoidance regimes within the Australian tax law.</p> <p>This session will cover:</p> <ul style="list-style-type: none"><li>• What anti-avoidance regimes exist in Australia</li><li>• How has the Commissioner applied the anti-avoidance regimes in practice; and</li><li>• What are the trends in the application of anti-avoidance rules and lessons from the cases determined by the courts.</li></ul>



# Technical program

**Day 2**      Friday, 28 March 2025 continued

Time *AEDT	Session	
10:30-11:00am	Morning tea	
11:00am-12:00pm	<p><b>Session 9: Tax director panel</b> Speakers: Steve Southon, ATI, National Australia Bank, and Sarah Pang, FTI, IAG Facilitator: Siew-Kee Chen, CTA, Deloitte</p> <p>What are the current priority issues for tax directors?</p> <p>We'll explore:</p> <ul style="list-style-type: none"><li>• Tax governance</li><li>• Global compliance models</li><li>• Tax technology and the use of AI</li><li>• Tax reporting and transparency; and</li><li>• Stakeholder management.</li></ul>	
12:00-1:00pm	<p><b>Session 10A: International tax update</b> Speaker: Manu Sriskantharajah, Deloitte</p> <p>What are the latest developments in international tax for financial services businesses in Australia?</p> <p>This session will look back over the past 12 months and look forward over the next 12 months and outline key considerations, including a discussion of emerging issues in relation to the following:</p> <ul style="list-style-type: none"><li>• Thin capitalisation (including debt deduction creation) rules</li><li>• Hybrid mismatch rules</li><li>• Pillar Two rules</li><li>• Non-resident CGT changes</li><li>• Reporting and disclosure requirements; and</li><li>• ATO expectations and areas of focus.</li></ul>	<p><b>Session 10B: Promoter penalty rules</b> Speakers: Jeremy Geale, CTA, MinterEllison and Sarah Taylor, Australian Taxation Office</p> <p>Please replace with: The promoter penalty rules were amended with effect from 1 July 2024 and are intended to deter and take action against the promotion of unlawful tax schemes.</p> <p>This session will:</p> <ul style="list-style-type: none"><li>• Provide a refresher on the promoter penalty rules</li><li>• Outline the recent changes made to the promoter penalty rules; and</li><li>• Reflect on the cases that have been before the courts.</li></ul>
1:00-2:00pm	Lunch	



# Technical program

**Day 2** Friday, 28 March 2025 continued

Time *AEDT	Session
2:00 – 3:00pm	<p><b>Session 11: Tax Policy update</b> Speakers: Graeme Cooper, FTI, Herbert Smith Freehills Tax policy may shape politics for the 2025 federal election. This session will consider:</p> <ul style="list-style-type: none"><li>• Tax policy initiatives announced by the Labor government and potentially include any relevant measures in the 2025-2026 federal budget</li><li>• Key election tax policies of the Labor government, the Coalition and other parties; and</li><li>• The missed opportunities from structural tax reform in Australia.</li></ul>
3:00 – 4:00pm	<p><b>Session 12: ATO Panel</b> Speakers: Bill Neskovski, Australian Taxation Office and Aaron Bennett, Australian Taxation Office Facilitators: Matt Osmond, CTA, PwC and Nicole Stratford, Barrenjoey This session will provide an update from the Australian Taxation office on its strategy and focus areas for the banking and finance industry and managed funds. It will include a panel discussion on some current technical, policy, practical and administrative topics. There will also be an opportunity for moderated Q&amp;A.</p>
4:00 – 5:00pm	<b>Conference close and networking</b>



# Presenters

**Michael Anderson**, is a partner in the corporate and international tax team at BDO. Michael has more than 25 years specialist knowledge of the financial services, energy and infrastructure sectors. He provides advice on M&A transactions, 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 Greenwoods & HSF, where he provided 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. Prior to that Michael was a partner for more than a decade with EY and Deloitte.

**Aaron Bennett**, is the Assistant Commissioner for the Private Equity Branch in Public Groups at the ATO and is responsible for leading the ATO's Collective Investment Vehicles strategy. Prior to taking up this role, Aaron was a Senior Technical Adviser and Acting Assistant Commissioner in the ATO's Tax Counsel Network. Aaron also has engagement and assurance experience from leading the ATO's managed investment trust assurance

program, as well as policy and law design experience from his time working at Treasury.

**Cameron Blackwood, ATI**, is the Head of Tax at Corrs 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.

**Jodie Bosler**, is the Senior Australian Tax Product Manager at State Street with over 30 years' experience in roles at professional services firms (C&L, PwC), fund managers (BT, Perpetual) and custodians/fund administrators (BT/Westpac, RBC,

HSBC, State Street). These roles have enabled Jodie to inform an extensive range of products, services, platforms and operating models – and associated risk management frameworks – for Australian market participants, from a design, execution, administration and change management perspective. Jodie has led in-house tax functions (BT, Perpetual), and engaged as lead tax SME for new product launches, regulatory change, transformation and remediation projects. She has contributed to various industry groups throughout her career and is currently a member of the ACSA Tax Working Group.

**Siew-Kee Chen, CTA**, is a Partner at Deloitte. He is the Deloitte Asia Pacific Regional Tax & Legal Leader for Investment Management. Siew-Kee is recognised as a leading tax adviser in investment management. Siew-Kee has over 26 years' experience providing tax advisory services to financial services, real estate, private equity and infrastructure clients and advising throughout the entire deal life cycle, including mergers and acquisitions, due diligence, tax compliance and divestments. He delivers practical and commercial expertise to clients, drawing from his previous role as the

Head of Tax of an Australian listed group. Siew-Kee has been heavily involved in the tax reform design for Management Investment Trusts, CCIVs and Financial Services.

**Tony Chen**, is a Director in PwC's International Tax Practice and advises on a wide range of corporate tax, international tax and transfer pricing matters with a focus on financial services. Tony has particular expertise in cross-border tax structuring, M&A, establishment of global transfer pricing policies, PE attribution and capital management. He has recently been assisting clients with working through technical and implementation matters relating to Pillar Two, including a secondment with a leading multinational group. Tony is a Chartered Accountant and a practising solicitor.

**Kimberley Christy, CTA**, is a Tax Partner with EY in Queensland and has experience in Australian income tax matters across the financial services industry and beyond. Her expertise covers a broad spectrum of income tax issues affecting clients within the financial services industry, including banks, insurers, superannuation funds and beyond.

# Presenters

**Graeme Cooper, FTI**, is an Emeritus Professor at Sydney University Law School and consultant to Herbert Smith Freehills. He is a former Chair of the New South Wales State Council of The Tax Institute and former member of the National Council. He has worked as a consultant to the ATO, Treasury, Board of Taxation, United Nations, OECD, World Bank, the International Monetary Fund and several foreign governments. He was admitted to legal practice in New South Wales and Victoria, and practised commercial law and tax in Sydney before entering teaching. He has taught in law schools in Australia, Europe, Canada and the United States, and holds degrees from the University of Sydney, University of Illinois and Columbia University, New York.

**Angela Danieletto**, is a partner in PwC's International Tax practice based in Sydney. Angela has over 20 years' experience advising on corporate and international tax matters across a range of industries and 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.

**Jeremy Geale, CTA**, is a Partner at MinterEllison. Jeremy Geale joined

MinterEllison recently, having previously been a Deputy Commissioner with the ATO responsible for the ATO's Review and Dispute Resolution area, covering all objections and litigation. He was also formerly the Deputy Chief Tax Counsel responsible for superannuation. Jeremy has more than 20 years tax and superannuation experience, most of which has been spent assisting taxpayers and the ATO to resolve complex tax disputes from audit through to litigation. He regularly acts for a number of funds, assisting them with engagement with the ATO, management of tax risk and governance, audit assistance and dispute resolution.

**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.

**Vanessa Kasbekar**, is a Tax Director at KPMG who is currently seconded to KPMG US in New York where she leads the US/Australia corridor. Vanessa has been in New York for the past two and a half years and has worked with many Australian institutional investors with investing in the US, including in US private credit. Prior to this, Vanessa has over 12 years' experience in Australian corporate tax, focusing on financial services and asset management where she has worked on major cross-border M&A transactions, fund structuring issues and has extensive experience managing interaction with, and reviews by, the Australian Taxation Office. She also has also spent 18 months on assignment in the London tax team of a large Australian asset manager.

**Bronwyn Kirkwood**, is a Counsel at Ashurst in Melbourne. Bronwyn's practice is in direct tax, with an emphasis on financial services and general corporate tax issues. Bronwyn's experience covers a broad range of matters, including providing income tax advice for cross border financing, structured financing arrangements, securitisations and mergers and acquisitions.

**Angelina Lagana, CTA**, has over 24 years' experience specialising in

tax controversy and dispute resolution. Angelina has represented high wealth individuals, large corporations and multinationals subject to Australian Taxation Office (ATO) Reviews and Audits, including the early assessment of contemporaneous evidence, audit strategy, and conducting successful negotiations leading to satisfactory resolution of ATO inquiries, reviews and audits. Angelina assists and advises her clients throughout all stages of an ATO inquiry from risk reviews, audits, objections, alternative dispute resolution, settlement and litigation. Angelina advises on effectively preparing for and resolving audits and disputes with the ATO, the preparation of evidence, application of legal professional privilege, freedom of information and regularly assists taxpayers when the ATO uses their Access powers (including onshore and offshore formal information gathering processes that occur during ATO risk reviews and audits).

**Daniel McInerney KC**, is one of Australia's leading taxation barristers. Since being called to the Bar in 2007 he has appeared in many significant tax cases and is regularly called upon for his advice on complex tax issues by taxpayers and the Australian Taxation Office.

# Presenters

**Brad Miller**, is a Partner in EY's Financial Services Indirect Tax team advising on a range of indirect taxes including GST. Brad focuses on assisting clients in the financial services sector by providing clear and concise value propositions to clients on very technical aspects of the GST legislation. Brad also assists clients from an indirect tax perspective on due diligence; structuring for acquisitions; divestment, developing and documenting GST apportionment methodologies; and managing ATO justified trusts reviews, as well as audits and disputes. Brad is an active member of a number of indirect tax committees for different industry associations, regularly advocating on behalf of those associations before both the ATO and Treasury.

**James Momsen**, is a Partner within the Sydney Tax team at BDO and provides Australian income tax structuring advice, and due diligence on transactions made by private equity, corporate, property and infrastructure clients. With almost 20 years experience solving Australian taxation issues across a range of corporate control and restructuring transactions, James specialises in the Private Equity, Venture Capital, property, and the large corporate

space. James has previously worked for a global accounting firm in New York and has extensive experience in M&A Tax advisory, fund structuring and management incentivisation structures.

**Cherelle Murphy** is EY's Oceania, Chief Economist. Prior to EY, Cherelle was Chief economist at Austrade, helping guide Australian Government policy in trade, foreign investment and tourism. Cherelle also spent 15 years at ANZ Bank, having started her career as an economic research analyst at the Reserve Bank of Australia. She also worked as a journalist for the Australian Financial Review. Cherelle holds a Bachelor of Commerce (Hons) from Curtin University and a Master of Population Studies from Australian National University. She is a graduate of the Australian Institute of Company Directors. Cherelle is and a member of Chief Executive Women and Deputy Chair of Australian Business Economists.

**Bill Neskovski**, is an Assistant Commissioner in Public Groups at the ATO and is responsible for leading the ATO's Banking and Finance, and GST Financial Services and Insurance strategies. Bill also leads a number of Engagement and Assurance teams

in Sydney which are responsible for the delivery of a large portfolio of compliance engagements across the Top 100, Top 1000 and Medium and Emerging markets. Bill has over 20 years' experience in leading complex audits and compliance engagements and also has responsibility of the ATO's transfer pricing Inbound Supply Chain strategy.

**Peter Oliver, CTA**, is the National Leader, International Tax at KPMG. Peter advises on cross-border transactions, international M&A, restructuring and other corporate matters. Peter formerly led the Australian Tax Centre at KPMG US from 2019 to 2022 where he also led the Australia-US corridor. Peter advises major ASX listed, private and institutional clients across a range of international tax issues, including the treatment of intangibles, hybrid mismatches, financing, corporate structuring and related matters.

**Matt Osmond, CTA**, is a Partner in the financial services corporate tax team at PwC focused on banking and financial services. He is a lawyer, chartered accountant and registered tax agent. Matt brings global and Australian insights in financial services and taxation to his corporate and international clients. Matt has over

27 years' experience working with banks and financial services businesses in Australia and the UK and advises on a range of matters including taxation of derivatives, financial arrangements, dividend management and franking, funding, profit repatriation, branch taxation, tax effect accounting, asset administration, securitisation, hedging, foreign exchange transactions, leasing, commercial and consumer finance products, offshore banking units, M&A and employee share schemes.

**Sarah Pang, FTI**, 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.



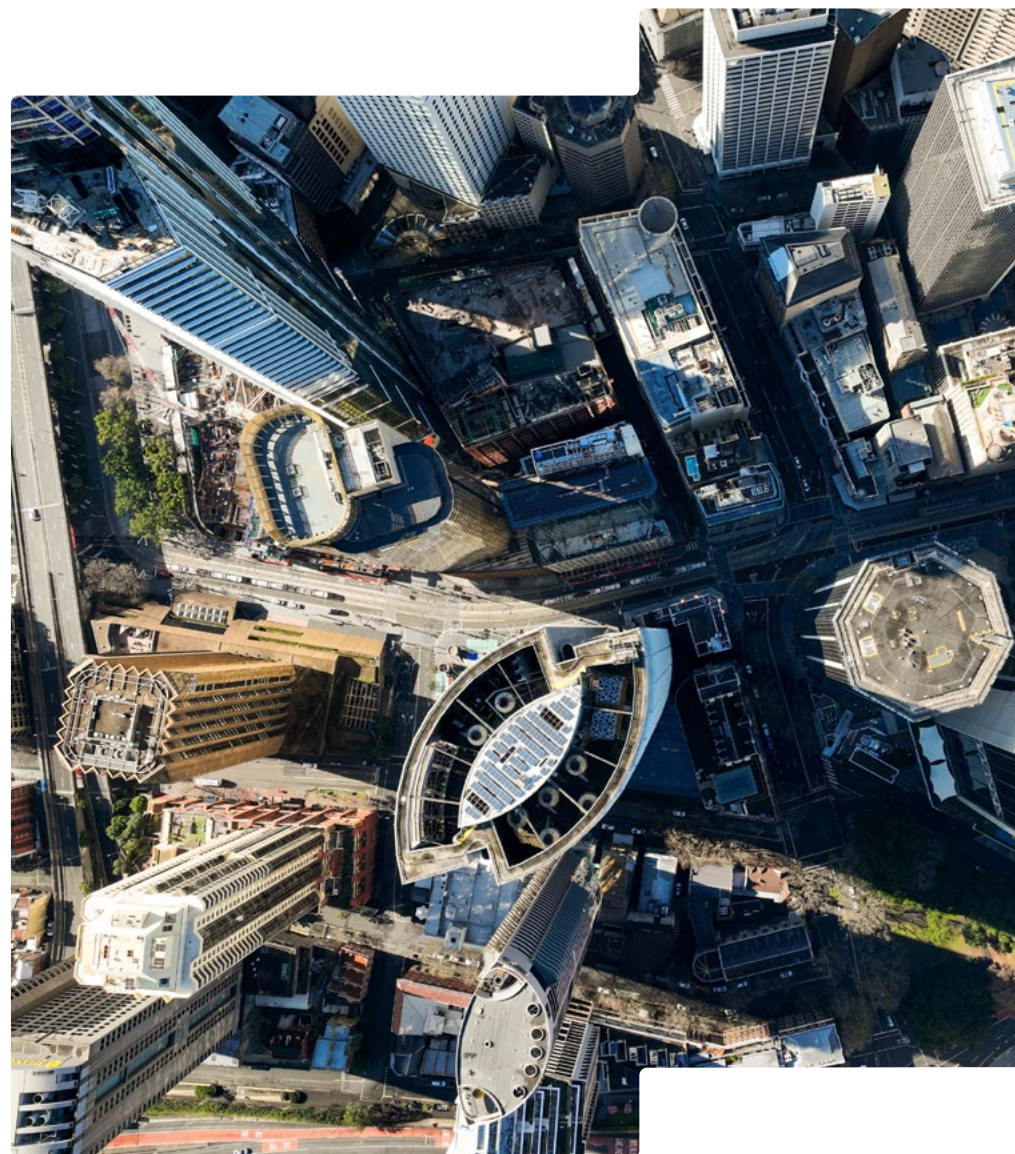
# Presenters

**Steve Southon, ATI**, has been NAB's Chief Tax Officer since March 2013. He has more than 32 years' experience in taxation across many business sectors ranging from small business to international banking. Steve has Bachelor degrees in Finance and Law and Masters degrees in Taxation and Law. Steve is also a former member of the Advisory Panel of the Board of Taxation and past President of the Corporate Tax Association.

**Manu Sriskantharajah**, is a Partner in Deloitte's International Tax Group with over 20 years' experience advising on the corporate and international tax aspects of inbound and outbound investment in Australia. Manu's expertise lies in cross-border M&A, group re-organisations, financing arrangements and intellectual property licencing, particularly in light of the OECD's proposed Base Erosion and Profit Shifting measures. Manu is a regular speaker at tax seminars, client forums, Deloitte's Asia-Pacific Dbriefs and consults with the Australian Government on international tax reform. Manu holds Bachelor of Commerce, Bachelor of Laws and Master of Laws degrees from the University of Melbourne and is an Australian Legal Practitioner.

**Sarah Taylor**, is an Assistant Commissioner, leading the Promoters and Tax Exploitation Program within Private Wealth Behaviours of Concern at the Australian Taxation Office. Sarah leads teams who focus on advisers and other intermediaries who encourage or promote tax avoidance or tax evasion schemes and apply tailored and timely treatment options, including the promoter penalty provisions, to deter the promotion of these unlawful tax schemes. Sarah is a highly experienced taxation professional with over 20 years experience and with special focus on private group structures and international tax. Sarah has significant experience in the private sector working in leadership roles with some of Australia's top professional firms.

**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.



# 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 redefining bespoke luxury in the heart of the harbour

### Getting there

Crown Sydney is centrally located along the Barangaroo waterfront, yet still 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 [www.carepark.com.au/find-a-care-park/barangaroo-reserve](http://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>.





# 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 12 hours of CPD with The Tax Institute.

## The Tax Institute's attendee hub

This event will be accessible to all delegates via our dedicated attendee hub.

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

## Delegate list

A delegate list will be included on the attendee hub to assist with networking. Please indicate at the time of registration if you do not want your name to be 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](mailto:nationalevents@taxinstitute.com.au)

## Networking function – Thursday, 27 March 2025

A networking function will be held directly following the last session on Thursday, 27 March 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](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.

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](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/ conference lunches	Networking functions
<b>Face-to-face full registration</b> 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 28 February 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](mailto: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 16 for registration inclusions.

#### Full registration – 12 CPD hours

	Member	New member*	Non-member
<b>Early bird registration</b> Register on or before Friday, 28 February	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$2,195
<b>Standard registration</b> Register after Friday, 28 February	<input type="checkbox"/> \$2,095	<input type="checkbox"/> \$2,095	<input type="checkbox"/> \$2,395

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, 27 March 2025 at the Crown Sydney

- 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](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**

### 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, 27 March 2025

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

#### Friday, 28 March 2025

- 9:30–10:30am  Session 8A  Session 8B
- 12:00–1:00pm  Session 10A  Session 10B

## 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](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 Level 21, 60 Margaret Street, Sydney NSW 2000

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_)

