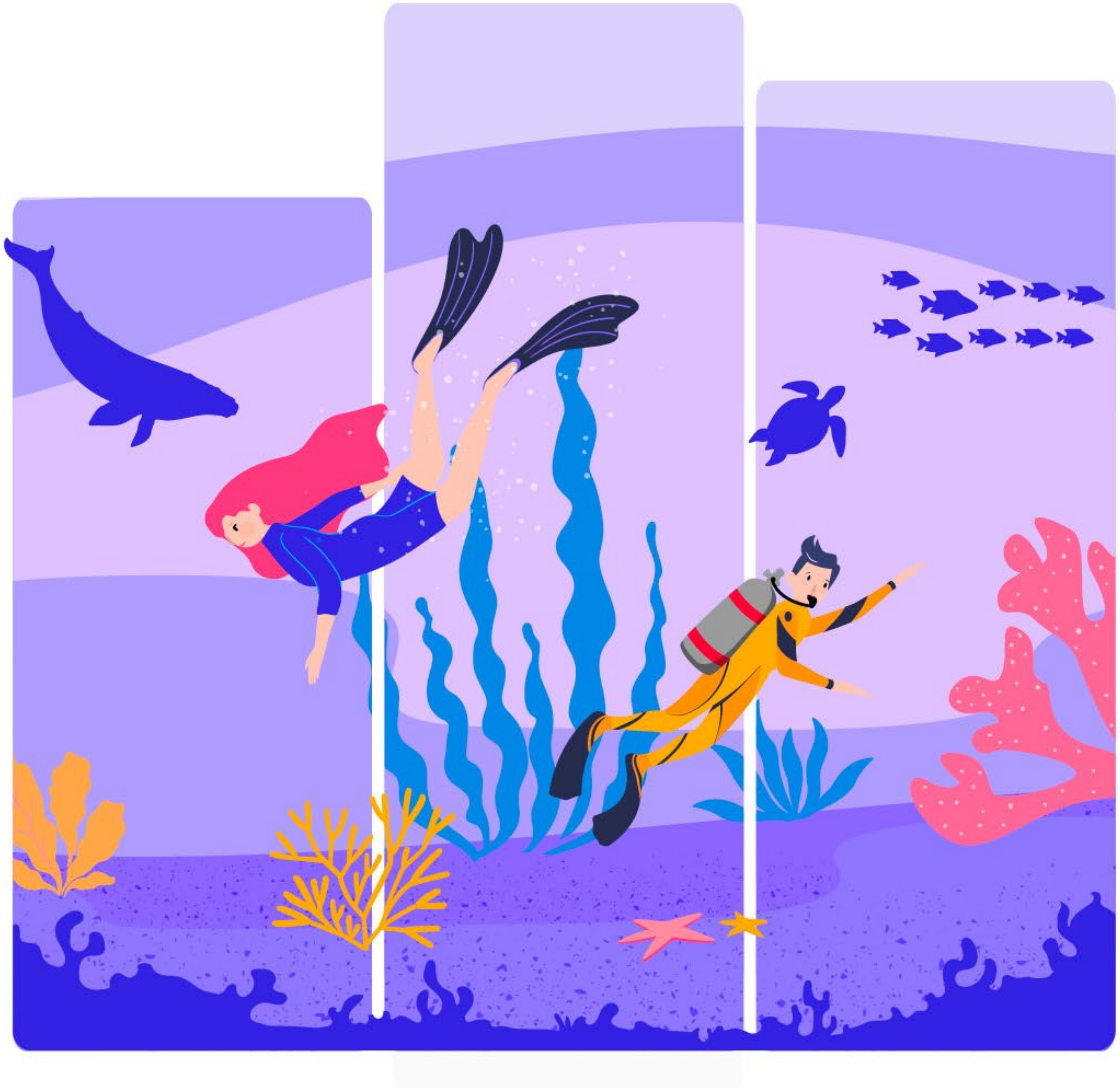
The Tax Institute

Noosa Tax Convention

26–28 November 2025

Sofitel Noosa Pacific Resort

13 CPD hours



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

Kim Reynolds, CTA, Co-Chair, Noosa Tax Convention Organising Committee
Emma Woolley, CTA, Co-Chair, Noosa Tax Convention Organising Committee
Liz Allen, Macpherson Kelley
Anthony Bach, CTA, Australian Taxation Office
Leo Efthivoulou, CTA, ENA Law
John Elliott, CTA, Strategic Edge
Kaitilin Lowdon, ATI, Sladen Legal
John Middleton, CTA, Australian Taxation Office
Sally Preston, CTA, Smart Solutions Tax and Business Advisory
Rachel Vijayaraj, CTA, Brown Wright Stein Lawyers
Mariana von Lucken, CTA, HLB Mann Judd

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Early bird pricing offer
Register on or before Friday, 24 October to save!

Welcome

Greetings and a warm welcome to the Noosa Tax Convention.

This year's theme, Navigating Complexity: Trusts, Private Groups and the Evolving SME Tax Landscape, recognises the increasing challenges faced by tax practitioners working with SME private clients. From shifting trust distribution strategies to significant case law developments, our program is designed to equip you with the technical knowledge and practical tools needed to navigate change with confidence.

We begin our journey with a guided workshop exploring the tax consequences of divorce and relationship breakdown. This interactive session will walk through factual scenarios and share practical experiences in navigating the structural and tax implications of such situations. From there, we will unpack critical topics including Division 7A evolution – Where are we headed?, Trusts under fire – distribution strategies, and rollover traps and back-to-backs, followed by ATO Hot Topics, offering valuable insights into current compliance activity targeting SME private groups. We wrap up with a forward-looking discussion on the new payday super rules and the key superannuation changes every SME should have on their radar.

The final day of the program rounds out the technical content with sessions that challenge and broaden our perspective. Ethics under pressure – advising in the grey zone explores the ethical tensions tax practitioners face when clients wish to "test the boundaries". In Foreign affairs – the tax romance (and reality) of doing business abroad, we examine cross-border structuring, withholding tax, and treaty implications. Our lively debate, Is super dead?, will consider the future role of superannuation as a wealth vehicle, before closing with Charting a course – insights from recent tax litigation, highlighting key lessons from landmark decisions impacting the SME market.

As always, the Convention offers a balance of high-calibre plenary presentations and interactive workshops, giving you the opportunity to explore technical issues in depth while applying them to real-world scenarios. We are privileged to have an outstanding line-up of sought-after presenters sharing their expertise, including case study insights, recent audit learnings, and strategies for managing change.

Alongside the technical sessions, our social program provides the chance to connect, network, and unwind in the beautiful surrounds of Noosa. This is a sell-out event each year, so secure your place now for three days of technical excellence, practical insights, and valuable connections.

Kim Reynolds, CTA
Co-Chair, Convention Organising Committee

Emma Woolley, CTA
Co-Chair, Convention Organising Committee

Technical program

Day 1 Wednesday, 26 November 2025

Time *AEST	Session
3:00 – 3:30pm	**Registration**
3:30 – 5:00pm	**Untying the knot – A post-love guided workshop navigating the tax consequences of divorce and relationship breakdown** Speakers: Joe Box, Grant Thornton, Genevieve Dee, Lander & Rogers, Adam Dimac, Hall & Wilcox Facilitator: Emma Woolley, CTA, Hall & Wilcox Nearly 50,000 divorces were granted in Australia in 2024. While this represents a 3% reduction from the prior year these numbers show us that a high number of our clients' relationships are not going the distance. The emotional fall out from divorce can, of course, be significant, but the end of a relationship can be the beginning of a journey through major financial consequences and complexities. Our panel of experienced advisers will take you through fact scenarios and discuss their experience in navigating the structural and tax consequences of splitsville. Each panel member will bring their unique perspective to our guided workshop and take you through issues including: • Determining the asset pool (cost bases, valuations) • Availability of roll overs • Dealing with losses • Trust matters (disclaimer of interest, valuations) • Navigating business issues, including control/management, third parties and shareholder agreements • Known and unknown tax issues (and how to fix them); and • Splitting super.
5:00 – 7:00pm	**Welcome reception**

Welcome reception

Join your colleagues, peers and our esteemed presenters for an evening of drinks and networking.

Drinks will be served at the Sofitel Noosa Pacific Resort from 5.00pm on Wednesday, 26 November. We hope you will join us for an enjoyable evening.

Price: Included for full registration delegates
Additional tickets are $85 per person, see registration form for details

Dress: Business casual

Technical program

Day 2 Thursday, 27 November 2025

Time *AEST	Session
7:45 – 8:15am	**Registration**
8:15 – 8:30am	**Welcome and President's Address, Tim Sandow, CTA, The Tax Institute**
8:30 – 9:30am	**Session 1: Division 7A evolution – Where are we headed?** Speaker: Stephen Holmes, CTA, WMS Chartered Accountants Division 7A continues to challenge advisers working with private groups. Despite the long-standing reform agenda, the law remains complex and fertile ground for both compliance errors and technical disputes. This session explores the operational complexity of Division 7A, focussing on how to future-proof compliance strategies in light of ATO focus areas and judicial developments, while also and highlighting provisions that can trip up or assist practitioners including: • **Section 109R** – Understanding how Division 7A might disregard repayments • **Section 109T** – How deeming provisions that catch indirect payments or loans—critical in structures involving layered trusts or corporate entities • **Section 109ZC** – Practical use of franked or unfranked dividends to reduce Division 7A loans and the documentation and timing rules that apply • **Section 109RB** – How is the Commissioner currently using his discretion to provide relief for genuine mistakes or oversights; and • **Post-Bendel uncertainty** – Where are we at? What does Bendel mean for trust distributions to corporate beneficiaries?

9:30 – 10:30am	**Session 2: Trusts under fire**
	Speakers: DJ Alexander, CTA, Queensland Bar, Kaitilin Lowdon, ATI, Sladen Legal
	Trusts are powerful estate and wealth planning tools—but they're not immune to scrutiny. Whether from regulators, courts, or disgruntled beneficiaries, trustees can easily find themselves "under fire" if decisions aren't made (and documented) with care.
	It is necessary to understand both the legal and tax risks to avoid hot spots in order to avoid the flames. This session will consider both:
	• Trustee obligations, with a particular focus on:
	  ◦ Validity of documents and retaining original documents
	  ◦ Fiduciary obligations; and
	  ◦ Distribution considerations.
	• Regulatory oversight, with a particular focus on:
	  ◦ Anti-avoidance provisions
	  ◦ Special considerations for testamentary trusts and in succession planning; and
	  ◦ Avoiding disclosing information that may open the trustee up to disgruntled beneficiaries.

10:30 – 11:00am	**Morning tea**

Technical program

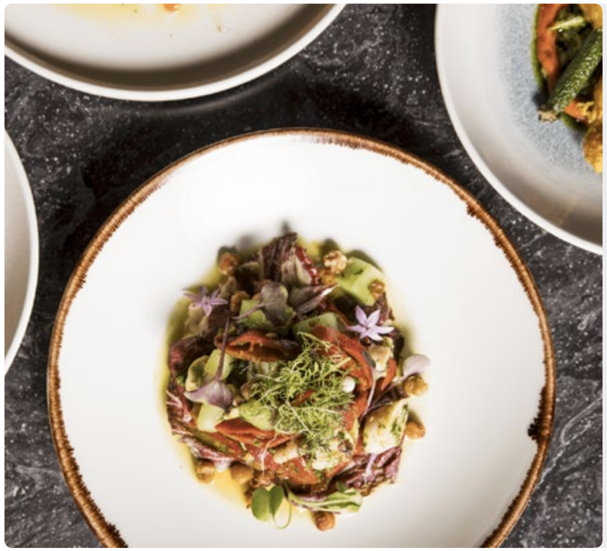
Day 2 Thursday, 27 November 2025 continued

Time *AEST	Session
11:00am – 12:00pm	**Session 3: Rollover traps and back-to-backs** **Speaker: David Hughes, CTA, McCullough Robertson** The Commissioner of Taxation demands taxpayers strictly satisfy all requirements of CGT rollovers, and also places an exacting interpretation on legislative phrases (such as the 'nothing else' requirement in the demerger rollover provisions in paragraphs 125-70(1)(c) – see TD 2020/6). Complicating the issue further is the awkward interaction between the rollover provisions and the consolidation rules. The Commissioner's uncompromising approach can lead to unexpected outcomes for taxpayers, particularly SME taxpayers, which will be explored as case studies in this presentation. Additionally, this presentation will consider: • Whether the Full Federal Court's decision in *AusNet Services Limited v Commissioner of Taxation* [2025] FCAFC 21 provides assistance to taxpayers in interpreting the rollover provisions • The state of play in relation to the Commissioner's guidance on back-to-back rollovers; and • The application of Part IVA to rollovers in light of recent cases such as *Merchant v Commissioner of Taxation* [2025] FCAFC 56, even in situations where taxpayers manage to navigate the precise technical requirements of the legislation.
12:00 – 1:00pm	**Session 4: ATO hot topics** **Speaker: Louise Clarke, Australian Taxation Office** Deputy Commissioner Louise Clarke will provide us with her practical insights from recent compliance activities concerning privately owned and wealthy groups, including: • The increase in issues relating to succession planning • Family Trust Elections and associated risks • Reflections on the Private Wealth Tax Avoidance Taskforce programs; and • Recent developments and key observations. This will be an interactive session, with Louise taking questions from the audience throughout her presentation.
1:00 – 2:00pm	**Lunch**
2:00 – 3:30pm	**Workshop 1** **Workshop Coordinator: John Middleton, CTA, Australian Taxation Office** **Workshop Leaders: Elizabeth Allen, Macpherson Kelley, Tara Cuddihy, CTA, PwC, Adam Dimac, Hall & Wilcox, Tracey Dunn, EY, Leo Efthivoulou, CTA, ENA Law, Michael Garrone, CTA, Mage Advisory, Sally Preston, CTA, Smart Solutions Tax and Business Advisory, Tanya Richards, Australian Taxation Office** This workshop will cover scenarios and topics from sessions 1 – 4.

Technical program

Day 2 Thursday, 27 November 2025 continued

Time *AEST	Session
3:30–4:00pm	**Afternoon tea**
4:00–5:00pm	**Session 5: Superannuation – Payday super and SMSF changes unpacked** Speaker: Liz Westover, FTI, Deloitte In this session, Liz will deliver a critical update on superannuation, focusing on the introduction of payday super. She'll explain the legislative proposals behind more frequent superannuation guarantee payments, clarify what payday super means for employers and stakeholders and outline rollout timelines and compliance requirements. Liz will also cover recent key changes in the SMSF industry, highlighting their impact on trustees and their advisors. Attendees will gain clear insights and practical guidance on compliance obligations and the latest SMSF regulatory developments.
5:00–7:00pm	**Delegate Free Time**
7:00pm	**Convention dinner**



Credit: localenoosa.com.au

Convention dinner

Join your colleagues and event speakers for a three course meal, drinks and networking at this fabulous venue.

Surrounded by lush gardens, Locale Noosa sits in a protected corner of Hastings Street just a few steps from the golden sands of Noosa Main Beach. Drawing heavily on Italian tradition, Locale Noosa offers a seasonally changing menu using the best in local produce and premium imported ingredients.

Date: Thursday, 27 November 2025

Time: 7.00pm onwards

Venue: Locale Ristorante & Bar, 62 Hasting Street, Noosa Heads

Price: Included for full registration delegates
Additional tickets are $170 per person, see registration form for details

Dress: Business casual

Technical program

Day 3 Friday, 28 November 2025

Time *AEST	Session
8:30 – 9:00am	**Tax policy & advocacy update**
9:00 – 10:00am	**Session 6: Ethics under pressure – Advising in the grey zone** **Speaker: Dr. Julianne Jaques KC, CTA, Victorian Bar** Explore the ethical tensions tax practitioners face when clients want to "test the boundaries"—whether it's around trust distributions, Division 7A, or asset protection strategies. This session walks through real-life scenarios to consider when advice edges toward enabling avoidance, or where silence may risk complicity including: • Recognising when a tax-effective strategy becomes ethically problematic • Documenting advice vs. shaping outcomes – drawing the line • Adviser independence, influence, and control over client entities • When to push back, when to disengage – practical warning signs • Navigating the tension between code of conduct and client privilege; and • Use of AI.
10:00 – 11:00am	**Session 7: Foreign affairs – The tax romance (and reality) of doing business abroad** **Speaker: Andrew Jones, CTA, BDO** Increasingly, small and medium Australian business perceive business opportunities overseas, including enhanced access to capital, new or larger markets, and proximity to suppliers or customers. Pursuing these opportunities can trigger many changes to existing arrangements, including new foreign-incorporated entities, new licencing or distribution arrangements, and relocating stakeholders – just to name a few. However, "going international" can have consequential longer term tax implications, which this session will consider. The following topics will be covered: • Can we redomicile the business? Can we redomicile the people? Tax residency complications and consequences • Repatriating wealth from companies and other offshore structures • Dealing with withholding taxes, including tax treaties • How does an international structure or investor impact succession planning? • 'Sleeper' issues that might be missed: Hybrid mismatch, foreign hybrids, controlled foreign companies, permanent establishments; and • Thin capitalisation rules, including debt deduction creation rules, and implications for family groups.

Technical program

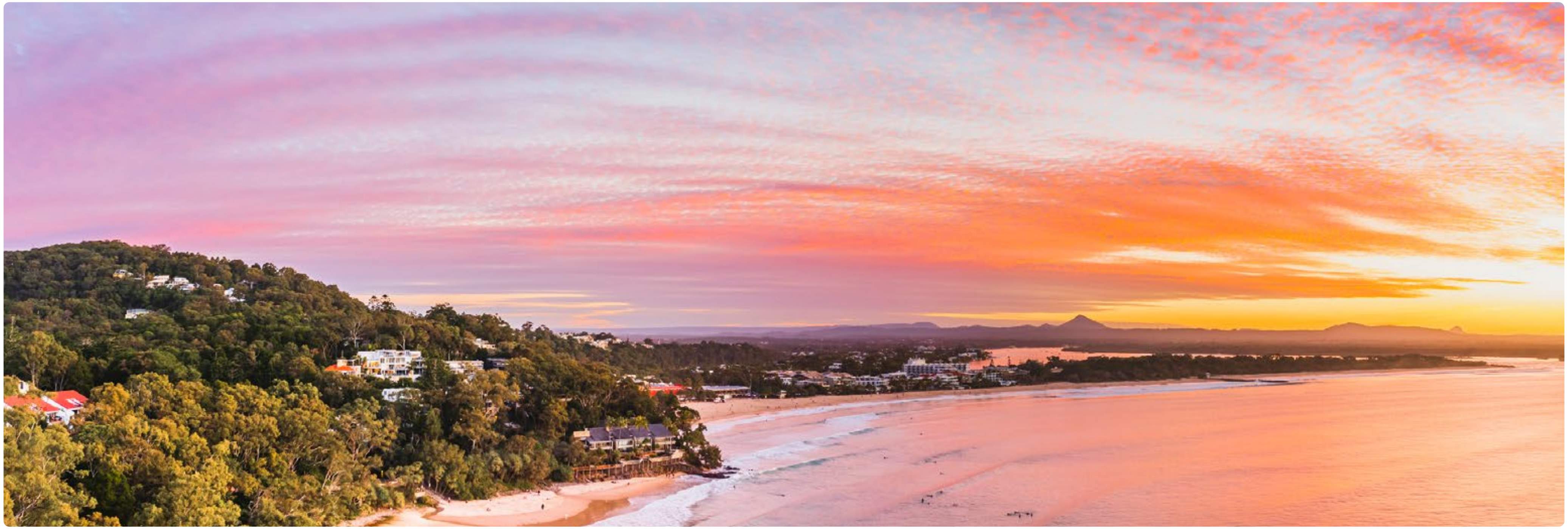
Day 3 Friday, 28 November 2025 continued

Time *AEST	Session
11:00–11:30am	Morning tea
11:30am–1:00pm	**Debate: Is super dead?** Adjudicator: John Elliott, CTA, Strategic Edge Debaters: Paul Banister, CTA, Grant Thornton, Jacquii Burnham, CTA, KPMG, Neal Dallas, CTA, BusinessDepot, Sally Preston, CTA, Smart Solutions Tax and Business Advisory With Division 296 on the horizon and ongoing uncertainty around superannuation legislation, it's time to ask: Is super still a reliable investment vehicle? Are these changes simply causing confusion? Could there be more effective ways to secure your financial future? Should your clients consider alternatives such as trusts, companies, or even early inheritance strategies? Join our panel of expert debaters as they unpack these critical questions and more. This timely and thought-provoking debate, delivered with a touch of humour, will offer valuable insights into the current state and future viability of superannuation in Australia.
1:00–2:00pm	Lunch

Technical program

Day 3 Friday, 28 November 2025 continued

Time *AEST	Session
2:00 – 3:00pm	**Session 8: Charting a course – Insights from recent tax litigation** Speakers: Fiona Dillon, CTA, Australian Taxation Office, Justin Byrne, CTA, Queensland Bar Fiona Dillon and Justin Byrne will close this year's convention with their perspectives on some of the more topical decisions handed down this year that impact the SME market. Fiona's role as the ATO's Chief Tax Counsel gives her visibility across all federal tax litigation whilst Justin, as a member of the Queensland bar, will provide a practitioner's viewpoint with some important signposts for those affected. This session, delivered by two very popular speakers in recent years, will be highly engaging and a fitting way to conclude the event.
3:00pm	**Closing address followed by afternoon tea**



Presenters

DJ Alexander, CTA, is a barrister at the QLD Bar. He advises on all taxes, with a focus on assisting clients manage ATO, QRO and ACNC audits, objections, litigation and rulings. DJ also frequently provides specialist tax opinions in various contexts such as family law property settlements, deceased estates and liquidations.

Elizabeth Allen is a Special Counsel at Macpherson Kelly. She acts for a wide range of private, corporate and HNWI clients with a primary focus on tax structuring and tax dispute work, concentrating on the delivery of outcomes and solutions that give her clients the confidence to keep doing what they do best. Elizabeth also acts for clients on various commercial matters including business sales and acquisitions.

Paul Banister, CTA, is a Chartered Accountant, a Partner at Grant Thornton and is Queensland's representative on The Tax Institute's National Council. He has over 35 years' experience working with clients to help them navigate through complex and potentially risky tax and commercial issues. His expertise includes domestic and international tax planning, transaction advisory and support, expert witness reports, succession planning and estate planning. Paul has presented at many professional and business forums, both in Australia and internationally. He is a contributing author to Thomson Reuter's Financial Planning Handbook. Paul is also the recipient of The Tax Institute's SME Tax Adviser of the Year Award for 2016 and currently the Vice-President of The Tax Institute.

Joseph Box is a Partner – Financial Advisory at Grant Thornton. An Accredited Business Valuation and Forensic Specialist, he has over 25 years' experience preparing expert witness reports across commercial loss assessments, insurance claims, valuations, damages in class actions, financial investigations and professional negligence matters. He has acted as an Independent and Court-Appointed Expert, providing oral testimony in the Federal Court, Supreme Courts, QCAT and various tribunals, including giving concurrent expert evidence. Joseph holds a Bachelor of Business (Accounting) from Griffith University and a Graduate Certificate in Forensic Studies (Accounting) from Monash University, and is a Fellow of CA ANZ.

Jacquii Burnham, CTA, is an Associate Director at KMPG in the Enterprise Division. With over 16 years' experience in Public Practice, Jacquii plays a key role as business and personal tax expert to many high net worth individuals and privately owned businesses. Jacquii has a passion for finding solutions to complex tax issues and enjoys working with clients to navigate the best tax outcome for their personal situation.

Justin Byrne, CTA, is a barrister at the Queensland Bar. Prior to joining the bar he was a solicitor for 20 years where he specialsied in taxation and revenue law. He advises on a wide range of complex taxation issues, including income tax, CGT, GST, payroll tax and stamp duty. He has qualifications and extensive experience in both law and accounting and is uniquely placed to provide practical and commercial tax solutions for clients. He is also experienced in negotiating with the ATO in relation to tax disputes and has conducted tax litigation in the Administrative Appeals Tribunal, Federal Court, High Court and State Courts.

Louise Clarke commenced her role as Deputy Commissioner, Private Wealth, on 23 August 2021 and her experience makes her well placed to lead the business line. Prior to Private Wealth, Louise was the ATO's Deputy Commissioner for Policy, Analysis and Legislation for just over 3 years. During that time, Louise led the ATO's contribution to the legislative design of the COVID-19 measures, including JobKeeper, and contributed to their implementation. Louise has spent an extensive period of her ATO career working in the Tax Counsel Network: she spent 5 years leading ATO strategic litigation and ran significant cases in the Federal Court and the High Court including Chevron, RCF IV and RCI. Louise's law design experience has spanned across her time in the ATO, including two years seconded to Treasury as a member of the Ralph Review Secretariat, working closely with Treasury in developing redrafted transfer pricing law, leading the ATO's contribution to a number of Board of Tax reviews and working of the design and implementation of a raft of new measures including Division 7A, the alienation of personal services income rules and the debt/equity rules.

Tara Cuddihy, CTA, is a Partner in PwC's Private tax group with over 15 years' experience specialising in providing tax consulting and compliance services to privately owned business, high net wealth individuals and family offices. In more recent times Tara has worked with clients in respect to their estate and succession planning as well as working with clients undertaking large scale acquisitions and disposals.

Presenters

Neal Dallas, CTA, is the Legal Director at BusinessDEPOT. He has extensive experience advising clients in the areas of superannuation, tax, estate planning and asset protection. He is recognised in the 2025 Edition of Best Lawyers in Australia in the areas of Superannuation Law, Tax Law, Trusts and Estates, and Wealth Management/Succession Planning Practice.

Genevieve Dee is an Accredited Family Law Specialist who has practiced exclusively in family and relationship law for 15 years. She is highly sought after for her expertise in complex property matters, including those involving taxation issues, trusts, manufacturing companies, rural issues, intergenerational wealth and family businesses, and complex corporate structures.

Fiona Dillon, CTA, is the ATO's Chief Tax Counsel, accountable for the ATO's public advice and guidance, litigation, and resolving the ATO's most significant tax technical issues. Fiona previously served as Minister-Counsellor (Taxation) in the Australian delegation to the OECD based in Paris and spent a number of years in private practice. Fiona is an admitted Australian legal practitioner and holds a Bachelor of Commerce, Bachelor of Laws with Honours, and a Master of Taxation.

Adam Dimac is an experienced tax lawyer, and advises clients on a range of matters including tax planning and structuring, Division 7A, the small business CGT concessions, corporate restructuring, professional firm structures, trust taxation, the taxation of settlements and cryptocurrency taxation. Adam regularly acts for taxpayers in dispute and controversy matters, and provides assistance with ATO reviews and audits.

Tracey Dunn is as Director with EY, Private – Tax in Perth. Tracey has a Bachelor of Business (Accounting), a Graduate Certificate in Commercial Law, a Bachelor of Laws and a Graduate Diploma in Legal Practice. Tracey was admitted as a lawyer in the Supreme Court of Western Australia in May 2022. Tracey has worked in public practice for over 20 years. Prior to commencing a career in public practice, Tracey worked in commerce in various roles. Tracey's expertise lies in providing both simple and complex tax advice to high wealth high net worth individuals, private groups, small and medium-sized businesses, and corporate entities. She has significant experience in advising on the application of FBT, Div 7A and trusts and regularly presents on taxation topics.

Leo Efthivoulou, CTA, is a director at ENA Law. Leo has over 14 years experience in advising in various industries, including agriculture and food, property, health and fitness, and to a broad client base. Leo has extensive experience in tax advisory, structuring and restructuring, succession planning, and general commercial legal transactions and advisory. Leo is also a Chartered Accountant, a member of The Tax Institute's various sub-committees including Tax Summit and Noosa Tax Convention.

John Elliott, CTA, has been in public practice for over 20 years. He has extensive experience working with small to medium businesses across a diverse range of industries. He advises clients on a broad range of matters such as structuring, business and personal income tax. He has been a Chartered Accountant since 2008, and a tax agent since 2010.

Michael Garrone, CTA, of Mage Advisory, is a trusted figure in the industry bringing over 20 years' experience across public practice and commerce. Michael has specialist knowledge in many areas of business, accounting and tax which he uses to facilitate complex projects and drive great outcomes for clients.

David Hughes, CTA, is a Partner at McCullough Robertson and a Queensland Law Society Accredited Specialist in taxation law. David acts for clients throughout Australia and offshore in relation to navigating cross-border taxation issues, including structuring advice and taxation disputes with the ATO, including audits, objections and running appeals in the High Court, Federal Court and the Administrative Appeals Tribunal against excessive tax assessments. David has also taken court action to prevent the ATO from taking illegal enforcement action, including successfully overturning departure prohibition orders.

Stephen Holmes, CTA, is a Partner with WMS Chartered Accountants based on the Gold Coast. He has been practicing as an accountant since 1987 and has had a focus on tax since 1994. He specialises in all SME tax matters with a particular interest in the CGT small business concessions, tax effective restructures and Division 7A. Since 2011, Stephen has been a senior tax and superannuation trainer with CAANZ and has been instrumental in establishing dedicated tax training communities on both the Gold Coast and in Lismore for Northern NSW practitioners. He is passionate about tax education and assistance for regional accountants. He is also a regular speaker for other professional bodies including the Tax Institute. Stephen holds separate Masters degrees in both Taxation and Economics as well as a Bachelor of Business. More recently, he was awarded a Juris Doctor degree with first class honours from Bond University.

Presenters

Dr. Julianne Jaques KC, CTA, is a barrister specialising in taxation law and regularly appears in taxation matters in the AAT and Federal courts, including more recently in the cases of Sharpcan, Victoria Power Networks and Sole Luna. Prior to coming to the Bar, Julianne spent 10 years in private practice with a major accounting firm and a major law firm, and was senior taxation adviser to the Federal Assistant Treasurer. She is a Chartered Tax Adviser and a Chartered Accountant, and her doctoral thesis at the University of Melbourne was on the taxation of corporates. Julianne is a member of the Tax Practitioners Board and the Board of Taxation. In 2020, Julianne was awarded Chartered Tax Adviser of the Year by The Tax Institute.

Andrew Jones, CTA, is a corporate and international tax partner with BDO Brisbane, and a member of the BDO Food and Agribusiness team. He provides practical, timely and relevant guidance and solutions to clients on a diverse range of tax matters, including tax compliance and risk management, transactions and restructures, and international operations. Andrew has a particular interest in agriculture, and co-owns a small horticulture operation in the Lockyer Valley, Queensland.

Kaitilin Lowdon, ATI, is a Principal Lawyer in Sladen Legal. She acts for a diverse range of clients, including (ultra) high net wealth individuals, family offices and business enterprises. Her expertise includes advising clients on high-profile and complex tax matters, including reviews, audits and litigation, and transactions, across a wide range of taxation matters.

John Middleton, CTA, is part of the ATO's Tax Counsel Network, where he works on complex technical advice, tax reform projects, and strategic litigation. He also worked in Policy and Law Design within the ATO. Prior to this, he had over 20 years in the private sector at Clayton Utz Brisbane specialising in revenue and commercial law. He practised in CGT, stamp duty, GST and general tax, as well as trust and corporate law. While in private practice John was listed in Doyle's and Best Lawyers in respect of revenue law matters.

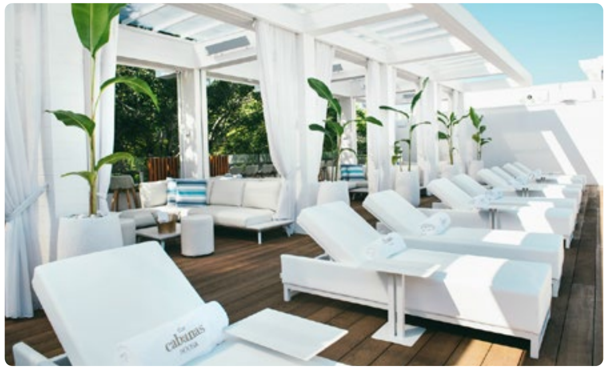
Sally Preston, CTA, is a partner of Smart Solutions Tax and Business Advisory. Sally has an extensive compliance and advisory background, specialising in tax consulting and transaction advisory. With a diverse career background, Sally has worked across various industries and offers a wide range of services to both small and large organisations. These services have included tax advisory, compliance, complex group structures including structuring for listed inbound and privately owned businesses, and assistance with ATO and Revenue office audits.

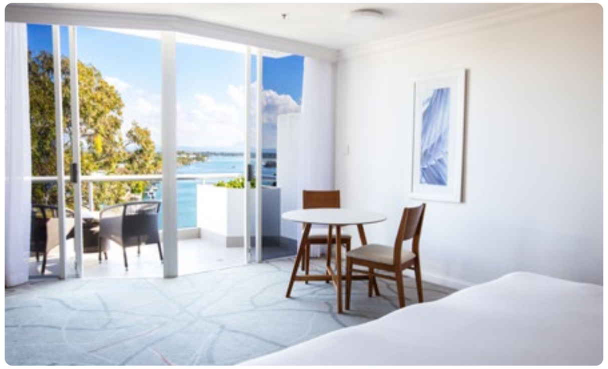
Tanya Richards, is a member of the ATO's Tax Counsel Network where she works on complex technical advice, strategic litigation, the development of Public Advice and Guidance and Law Reform in the private domestic structure market. Tanya has over 20 years' experience providing tax advice in the government with significant experience in Private Wealth. Tanya has qualifications in Law, Accountancy and Information Technology and prior to the joining the ATO worked in private practice as a business consultant and commercial litigator.

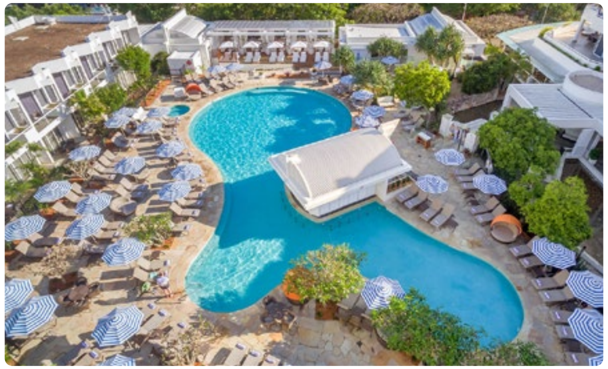
Liz Westover, FTI, is a Partner and National SMSF Leader at Deloitte. She is responsible for the firm's SMSF service offering, providing compliance and advisory services to the firm's clients. Liz has extensive experience in superannuation and has strong capabilities on the technical and practical application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

Emma Woolley, CTA, of Hall & Wilcox Lawyers has extensive experience in advising clients in estate planning and estate administration, trust establishment and ongoing administration, trust estate disputes, and structuring for succession of ownership and control of private and family businesses. She leads Hall & Wilcox Lawyers' Private Client practice. Emma's clients include high net worth individuals, families and privately held businesses.

Venue and accommodation







Sofitel Noosa Pacific Resort

14–16 Hastings Street, Noosa Heads, QLD, 4567

The Sofitel Noosa Pacific Resort is in the heart of Noosa, on cosmopolitan Hastings Street, across from Noosa Main Beach and overlooking Laguna Bay and the natural beauty of Noosa River. The Sofitel Noosa Pacific Resort offers the quintessential five-star Noosa experience, from the luxurious AQUA Day Spa through to a full range of leisure activities including golf and tennis. The very spacious, self-contained guest rooms come complete with private balconies and spa baths.

Getting there

The Sofitel Noosa Pacific Resort is approximately a two-hour drive from Brisbane Airport or 40 minutes' drive from Sunshine Coast Airport.

Parking

Car parking is $25 per day for self-parking or $35 per day for valet parking at the Sofitel Noosa Pacific Resort.

Accommodation

Please see below the available options for booking your accommodation at Noosa:

Mantra French Quarter Noosa
Peppers Noosa Resort & Villas
Jacaranda Noosa Apartments
Hotel Laguna
Tingirana Noosa
Hastings Suites

Through third-party booking websites

Tripadvisor
Booking.com

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

Destination Noosa

Dining Out on Hastings Street

Bistro C | 49 Hastings Street

Positioned perfectly on the beachfront overlooking Noosa's Laguna Bay and inspired by the amazing local produce of the region, Bistro C's menu showcases the changing seasons in carefully created dishes by their dedicated culinary team. Visit the website to find out more or phone 07 5447 2855 to book a table

Miss Moneypenny's | 6 Hastings Street

Miss Moneypenny's, located on beautiful Hastings Street, Noosa, is a stylish venue with a relaxed atmosphere and a focus on social dining that offers a diverse range of cocktails, alongside globally influenced Modern Mediterranean cuisine. Visit the website to find out more or phone 07 5447 5111 to book a table.

Bang Bang | 6/32 Hastings Street

Located in the middle of bustling Hastings Street, Bang Bang is one of the best Asian restaurants in Noosa and offers a diverse and extensive wine list as well as a variety of share plates. Visit the website to find out more or phone 07 3185 4666 to book a table.

El Capitano | Upstairs, 52 Hastings Street

Old world pizza's and cocktails for new age sailors. El Capitano is renowned for their take on old world pizzas, made using certified organic fresh milled flours, filtered water, sea salt and a 72 hour fermentation process, pair this with their vast cocktail list and you've got the perfect evening. Visit the website to find out more or phone 07 3185 4666 to book a table.

Explore Noosa

Stand up paddle-boarding

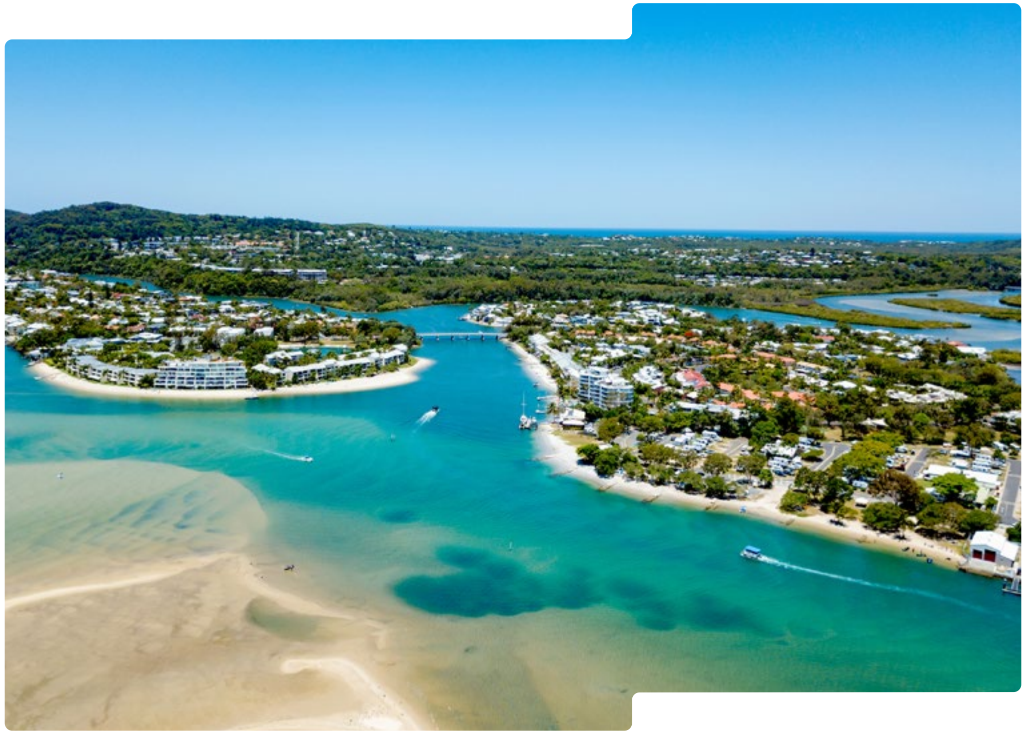
Try your hand at stand-up paddle-boarding and see Noosa from a new perspective, get the team together and book a group lesson or join one of the experienced tour guides for a journey through the waterways and mangroves. Find out more at Noosa Paddle Boarding.

Gondolas of Noosa

If you would rather relax and let someone else do the driving, why not book a Gondola ride? With BYO drink or catered options, you can take your team or enjoy a quiet ride around beautiful Noosa by yourself. Bookings are essential and can be done via their website or by phoning 0412 929 369.

Shopping

Hastings street is a haven for shoppers with an eclectic collection of boutique and brand-name shops covering all things from fashion, fine art, homewares, jewellery and more.



Event information

Welcome reception – Wednesday, 26 November 2025

The Networking Function will be hosted at the Sofitel Noosa Pacific Resort on Wednesday, 26 November from 5:00pm. The networking function is included in the event registration fee for delegates, additional tickets can be purchased for accompanying persons and guests at a cost of $85

Convention dinner – Thursday, 27 November 2025

The Convention Dinner will be hosted at Locale Ristorante & Bar on Thursday, 27 November from 7:00pm. The dinner is included in the event registration fee for delegates, additional tickets can be purchased for accompanying persons and guests at a cost of $170.

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 Convention counts for 13 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 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 attendee hub by email.

Delegate list

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

Dress code

Business casual or resort wear 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.

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

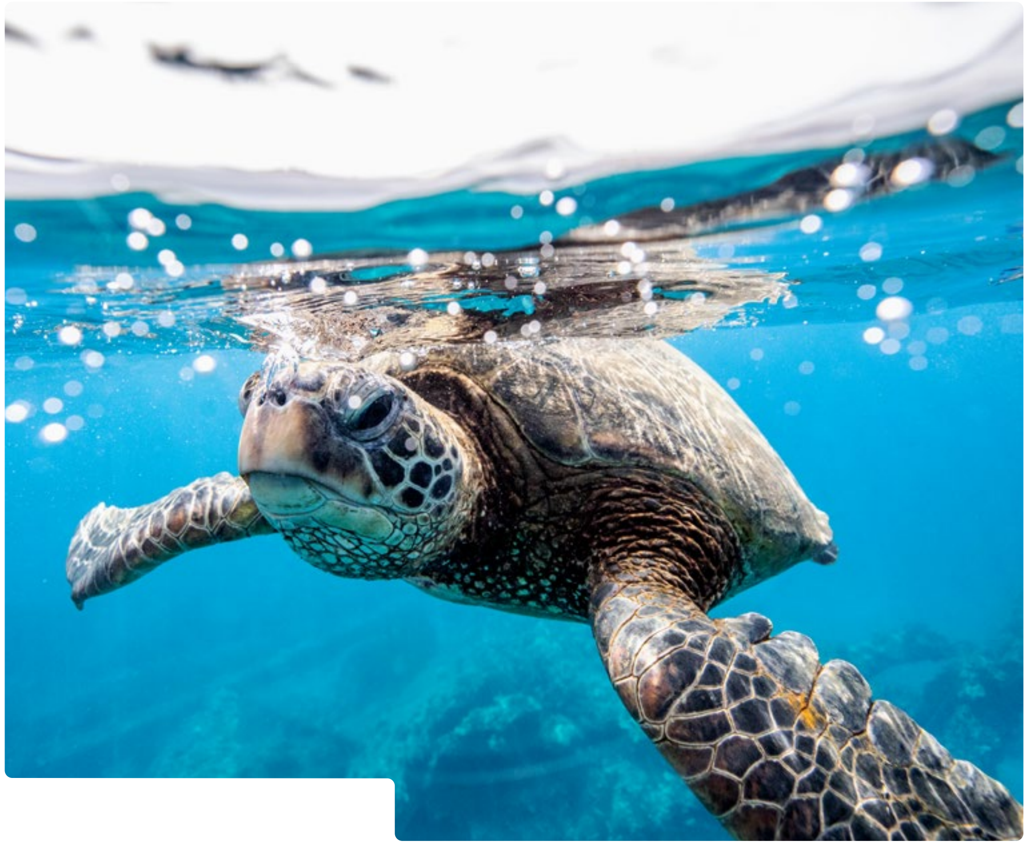
	Online access to presentations and technical papers	Morning/ afternoon tea/ lunches	Welcome reception and Convention dinner*
Full registration This registration option entitles one delegate to attend the entire event.	✓	✓	✓

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

Register now!

Register online ▶

Register via form ▶ included in this brochure



Discounts

Early bird registration

All registrations received and paid on or before Friday, 24 October 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.

The Tax Institute

Noosa Tax Convention
Registration form

44714 | WD

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

1 Registration

Please see page 17 for registration inclusions.

Full registration – 12 CPD hours

	Member	New member*
Early bird registration Register on or before 24 October 2025	☐ $2,195	☐ $2,590
Standard registration Register after 24 October 2025	☐ $2,395	☐ $2,790

☐ 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, 26 November 2025 at Sofitel Noosa Pacific

☐ 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 $85 per person

No. ______ x tickets at $85 each: $ ______

Dietary requirements:

Convention dinner

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

Thursday, 27 November at Locale Ristorante & Bar

☐ 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 $170 per person

No. ______ x tickets at $170 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: DD/MM/YYYY

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

JOIN TODAY

*Become a member and save!

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

- save over $230 on Affiliate membership on the first 12 months
- 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: DD/MM/YYYY

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3 Payment summary

Registration fees	$
Additional guest tickets – Welcome reception ($85 each)	$
Additional guest tickets – Convention dinner ($170 each)	$
Total payable	$

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: MM/YY

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

To register **Email** customeradmin@taxinstitute.com.au **Mail** Level 21, 60 Margaret Street, Sydney NSW 2000 **Online** taxinstitute.com.au

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The Tax Institute

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