



International Masterclass

 24 Jun 2026

 CPD 7

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

Thomas Ickeringill, FTI, Chair, International Masterclass Organising Committee

Donna Arnold, HLB Mann Judd

Mathew Chamberlain, CTA, EY

Keir Cornish, Australian Taxation Office

Kai-Chen Lamb, Mallesons

Peter Oliver, CTA, KPMG

Shahzeb Panhwar, ATI, Alvarez & Marsal

Zubin Sadri, CTA, BDO

David Schultz, Deloitte

Cam Smith, ATI, Deloitte

Joey Wang, HLB Mann Judd





Welcome

It is my pleasure to welcome you to this year's International Masterclass.

It has been a big 12 months in international tax and transfer pricing. At a global level, we have seen ongoing pressure on governments to raise revenue, trade tensions between major political powers and rapidly evolving business models. Against this backdrop, multinational taxpayers, their advisers and tax administrations are being required to navigate an environment that is more complex, more uncertain and more public than ever before.

Familiar themes like related party financial dealings, intangible assets and the taxation of real property remain as complex and contested today as they have ever been. Less familiar themes, like tax transparency, the exchange of information and mandatory binding arbitration, are emerging as major challenges for taxpayers and the ATO. Understanding the forces behind global trends and keeping abreast of domestic developments is essential to remaining at the forefront of international tax today.

This year's Masterclass has been carefully curated to reflect these challenges. Across the one-day event, some of Australia's leading tax professionals will explore what is most relevant in tax policy and practice. The event will cover recent developments in cross-border tax disputes and administration, the proliferation of M&A tax issues and the emergence of tax transparency and governance as a core component of modern tax functions. The event will also consider major legislative, case law and practical developments, including in the context of intragroup finance, the general anti-avoidance rule in Part IVA and the rollout of Pillar Two.

As always, the International Masterclass is intended to be both rigorous and practical. We expect it to equip you with cutting-edge technical insights, while also providing the opportunity to engage with your peers and leading thinkers across the profession.

Finally, I want to thank our speakers and organising committee members for their contributions to what I hope will be an outstanding event. I look forward to welcoming you and to a day of thoughtful discussion, debate and connection.



Thomas Ickeringill, FTI
Chair, International Masterclass
Organising Committee

Early bird pricing offer
Register on or before 22 May 2026 to save!

Technical program

Day 1 Wednesday, 24 June 2026

Time *AEST	Session
8:00 – 8:25am	Registration
8:25 – 8:30am	Welcome and Opening Address Speaker: Thomas Ickeringill, FTI, Chair, International Masterclass Organising Committee
8:30 – 9:30am	Session 1: Taking it Back to the Start: Managing Tax Disputes and Administration with a Cross-Border Element Speakers: Jerome Tse, CTA (Life), Mallesons, Paula Yu, Mallesons Managing tax disputes has never been easy, but with the pace of developments in tax administration, taxpayers may not have expected it to become quite so complex. In this session, the speakers will share their insights and experience on some of the key issues and recent developments in cross-border tax disputes and administration, including: <ul style="list-style-type: none">• The ATO’s information gathering powers, including practical, legal and strategic considerations when dealing with informal and formal RFIs, particularly in the context of offshore information notices• International developments in the exchange of information, including the relevance of the OECD Convention on Mutual Administrative Assistance in Tax Matters and the implications of the recent Federal Court of Canada decision in Shopify• The latest thinking on mutual agreement procedure and mandatory binding arbitration, including the implications of the recent Full Federal Court of Australia decision in Oracle.
9:30 – 10:30am	Session 2: Holding Up the Celestial Heavens of Tax Transparency and Governance in Australia Speaker: Kara Singleton, ATI, Deloitte This session will explore the evolving landscape of tax transparency and governance in Australia, including practical measures for dealing with: <ul style="list-style-type: none">• The rollout of Public Country-by-Country Reporting, what multinationals are disclosing, governance, reputational risk and board-level implications, sourcing data and cross-over with similar international measures, and practical experience with exemptions• The redesigned Voluntary Tax Transparency Code, key changes in the 2025 redesign and practical implications• The ATO’s Justified Trust program, whether the increase in tax transparency is positively influencing taxpayer behaviour• The Board of Taxation’s review into reducing red tape in the tax system.
10:30 – 11:00am	Morning tea

Technical program

Day 1 Wednesday, 24 June 2026 continued

Time *AEST	Session
11:00am – 12:00pm	<p>Session 3: Pillar Two: The Pillars of the Temple Stand Apart Speakers: Jonathan Todd, Australian Taxation Office, David Schultz, Deloitte</p> <p>The Pillar Two rules are going live and represent the most significant global change to international tax since BEPS 1.0. This session will provide an Australian perspective on Pillar Two and what the Side-by-Side rules mean for businesses and their advisers. Our speakers will explore key features of Pillar Two, including:</p> <ul style="list-style-type: none">• The Combined Global and Domestic Minimum Tax Return, including key compliance requirements, timing considerations and practical issues for in-scope groups• The Pillar Two safe harbours and exemptions, including when they may apply, key eligibility considerations and the challenges associated with relying on them• The GloBE Information Return and foreign lodgement notification, including reporting obligations, interaction with overseas filings and practical areas of focus for multinational groups.
12:00 – 1:00pm	<p>Session 4: Related Party Financing: Is Our Credit Still Good? Panellists: Jolyon Dare, CTA, HLB Mann Judd, Sarah Stevens, PwC Facilitator: Shahzeb Panhwar, ATI, Alvarez and Marsal</p> <p>This session will examine the latest international tax developments concerning related party finance, including:</p> <ul style="list-style-type: none">• Practical lessons following the debt deduction creation rules going live• The impact of the new interest limitation rules on related party finance• What activity we are seeing on the quantum of debt• The relevance of interest rate pricing today• The ongoing role of Part IVA.
1:00 – 2:00pm	Lunch
2:00 – 3:00pm	<p>Session 5: Part IVA: Anti-Avoidance Speaker: Dioni Perera, FTI</p> <p>Anti-avoidance remains a key focus area in the international tax landscape, with recent case law developments, proposed changes to Part IVA and the growing relevance of treaty-based provisions continuing to reshape the risk environment for cross-border arrangements. These developments are becoming increasingly important for multinational groups, investors and advisers managing international structures and transactions.</p> <p>This session will examine recent anti-avoidance developments in an international tax context, including proposed amendments to Part IVA and the practical application of treaty-based anti-avoidance provisions. It will also consider the broader implications for structuring, governance and dispute risk in a rapidly evolving international tax environment.</p>
3:00 – 3:30pm	Afternoon tea

Technical program

Day 1 Wednesday, 24 June 2026 continued

Time *AEST	Session
3:30 – 4:30pm	<p>Session 6: Cross-Border M&A: Current Strategies and Challenges Speaker: Naomi Ross, EY</p> <p>This practical session will explore a range of critical tax issues affecting cross-border M&A and transactions, including:</p> <ul style="list-style-type: none">• Practical considerations in dealing with Australian regulators, including the ATO, ASIC and FIRB• Critical issues affecting restructures and divestments, focused on what is “taxable Australian real property” and how it is valued, having regard to recent cases, including YTL Power and Newmont Canada, and recent and proposed legislative reforms• Current ATO activity, including targeted reviews concerning TA 2020/4 and cases, for example Hilton• The impact of the OECD’s Pillar 2 regime on traditional tax due diligence reviews• A renewed focus by revenue authorities on tax residency, treaty eligibility, substance and beneficial ownership.
4:30 – 5:30pm	<p>Session 7: Global Tax Policy at a Crossroads: What’s Next for International Tax and the Digital Economy? Panellists: Hon David Bradbury, KPMG, David Watkins, CTA, DW Tax, Grant Wardell-Johnson, KPMG Facilitator: Peter Oliver, CTA, KPMG</p> <p>Join this panel discussion as leading policy, technical and commercial thinkers unpack the shifting global tax landscape. This session will explore recent and emerging developments in global tax policy, including the key structural challenges in international taxation, potential institutional responses to those challenges, the current state of play of the two-pillar solution for the digital economy, and what the future of US tax policy may mean for investment, deal activity and global uncertainty.</p>
5:30pm	Masterclass close and networking drinks



Networking function

Join your colleagues, peers and our esteemed presenters for an evening of drinks, canapes and networking at the Establishment Ballroom, Sydney.

Date: Wednesday, 24 June 2026

Time: 5:30pm onwards

Venue: Establishment Ballroom, Sydney

Price: Inclusive for all full registration delegates
\$80 for additional tickets – see registration form for details

Dress: Business or business casual attire

Presenters

Hon David Bradbury is a partner in KPMG Australia's Consulting Division. Prior to returning to Australia in mid-2024, David was the Deputy Director and Head of Tax Policy at the OECD in Paris for more than 10 years. At the OECD, David was a key contributor to the OECD/G20 BEPS Project and the OECD's work on the two-pillar solution to address the tax challenges arising from the digitalisation of the economy, which included the development of the global minimum tax on large multinationals. Prior to joining the OECD, David was the Assistant Treasurer in the Australian Government, where he had responsibility for tax policy and administration. David started his career as a tax lawyer working in private practice.

Jolyon Dare, CTA, is a Tax Partner of HLB Mann Judd (NSW) where he specialises in helping corporate and SME clients and their advisors. Jol has significant experience in SME restructuring, practically assisting small businesses to manage their tax risk and opportunity, and realise their highest value at sale. Jol is a regular presenter for The Tax Institute's Local Tax Club and NSW Tax Forum.

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.

Shahzeb Panhwar is a Managing Director and Transfer Pricing Lead in Alvarez & Marsal's Australian Tax practice. Shahzeb has extensive experience in international tax, tax structuring and transfer pricing matters across a number of industries. Before joining A&M Shahzeb was a Tax Controversy Partner at a Big 4 firm as well as an Assistant Commissioner with the ATO and had strategic oversight of a number of strategic international tax and transfer pricing risks and strategies.

Naomi Ross is an experienced, internationally connected tax advisor who has spent the last seven and a half years leading EY's Australian Tax Desks in both London and New York. With over 20 years' experience advising Australian and multinational groups, she specialises in cross border M&A, structured finance and complex international tax matters, including Australian tax residency, permanent establishment and treaty issues, taxation of intangibles, hybrid mismatch rules, and cross border and

domestic financing. Having worked across multiple jurisdictions, Naomi brings a global perspective to complex transactions and has advised on numerous cross border M&A deals in recent years.

David Schultz is an International Tax Partner with over 15 years' experience across Big 4 and law firms across both Australia and the UK. David specialises in advising on cross-border tax issues, including M&A, reorganisations, IP structures and corporate finance. David has a particular focus on Pillar Two and has worked extensively with taxpayers in both Australia and the UK in relation to Pillar Two compliance, strategy, and planning. David previously worked for Baker McKenzie in London and spent over 10 years advising on UK international tax, and before that worked for PwC in both Australia and London. He was also a member of the ATO's Pillar Two working group.

Kara Singleton, ATI, is a Partner in Deloitte's Trust & Governance Team with over 20 years experience providing tax advisory and end-to-end compliance services, with a focus on tax risk management. Kara is passionate about tax governance and working with clients to ensure appropriate and robust processes and controls are in place to manage their key tax risks.

Sarah Stevens is a transfer pricing specialist in PwC's Global Tax team in Sydney. Sarah has specialised in transfer pricing since joining PwC in 1999 and has deep transfer pricing experience across a wide range of issues and industries, and has also supported clients to review their cross-border arrangements in light of other international tax rules such as the diverted profits tax and hybrid mismatch rules. Sarah has assisted numerous clients to review their cross-border funding arrangements in light of the ATO's risk assessment framework in PCG 2017/4.

Jonathan Todd has been the Assistant Commissioner for OECD Programs, Treaties and Advice since March 2026. His branch is responsible for the ATO implementation of OECD related programs or work, including the administration of Pillar Two. He also has oversight of the Treaties Consultation Unit which supports the Government's tax treaty program and provides specialist treaty related advice. His prior roles were AC in Private Wealth and Behaviors of Concern, Acting Deputy Commissioner of Litigation and Legal Services, AC of General Litigation, ATO General Counsel for 7 years, Senior Tax Counsel and member of the Public Rulings Panel, Senior Lawyer at the Australian Government Solicitor and auditor in the High Wealth Individuals Task force.

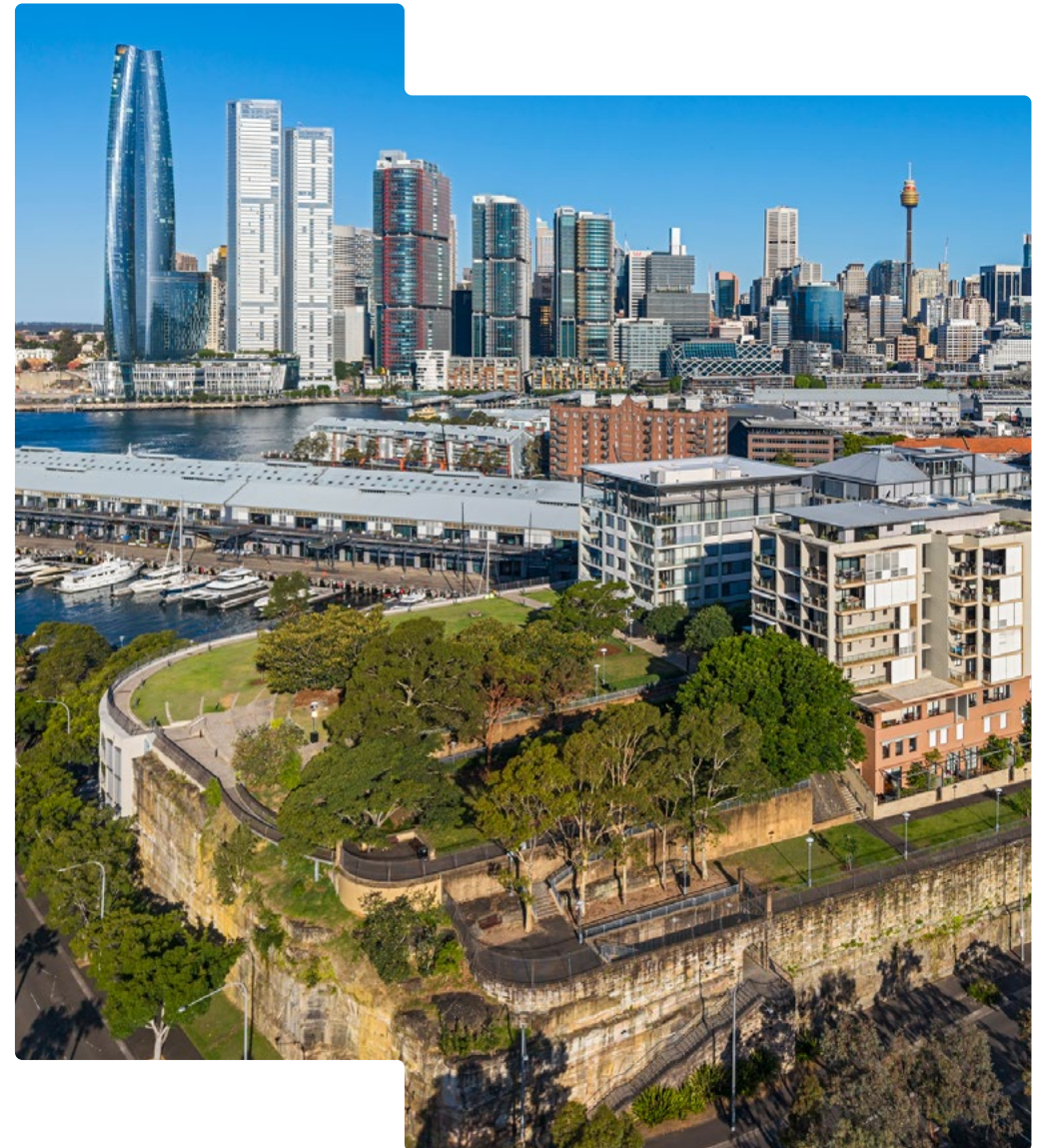
Presenters

Jerome Tse, CTA (Life), is a Partner at Mallesons, specialising in taxation disputes and litigation. Jerome is also the firm's global transfer pricing coordinator. Jerome is an experienced tax practitioner and has been involved in a number of Australia's recent high profile tax cases. Jerome was the 2022 Tax Institute President.

Grant Wardell-Johnson has been involved in international taxation for more than three decades, most recently as KPMG Global Tax Policy Leader based in the United Kingdom from 2021 to 2025. Prior to that he was the Australian Tax Policy Leader for a decade including Co-Chair of the National Tax Liaison Group from 2015 to 2021. He has been leading tax partner for many Australian corporates and M&A transactions.

David Watkins, CTA, has over 35 year's experience in corporate income tax at KPMG, Deloitte and Gilbert + Tobin. Particular areas of interest are global and Australian tax policy, consultations and submissions associated with new and emerging tax law, international tax and double tax treaties. David has lived and worked in Malaysia, Singapore and New York.

Paula Yu is a Solicitor at Mallesons taxation group. She has worked across a range of tax controversy, corporate tax and stamp duty advisory matters.



Venue and accommodation



The Establishment Ballroom, Sydney

Level 3, 252 George Street, Sydney, NSW 2000

Join us at the prestigious Establishment Ballroom in the heart of Sydney for a day of insights, discussion and networking at the International Masterclass. With its high ceilings, grand chandeliers and elegant interiors, the Ballroom offers a sophisticated setting for one of The Tax Institute's flagship international tax events. Located within the iconic Establishment precinct, the venue places delegates in the centre of Sydney's business and dining district, creating the ideal backdrop for a day of thought leadership, practical insights and professional connection.

Getting there

By Car

The Establishment Ballroom is located on Level 3, 252 George Street, Sydney.

By Train

Wynyard Station is the nearest station and is approximately 250 metres from the venue.

By Ferry

Circular Quay Wharf is approximately 600 metres from the venue.

Parking

Nearby parking is available at the following locations:

[Wilson Parking](#)

[Secure Parking](#)

Please note that parking availability is subject to change. Delegates are encouraged to check directly with the parking provider and book in advance where required.

Accommodation

A limited number of rooms are available at the Establishment Hotel, located within the same iconic precinct as the Ballroom. Combining contemporary luxury with heritage charm, the hotel offers delegates the convenience of staying just steps from the event venue in the heart of Sydney.

To make a booking, please contact Guest Services directly on (02) 9240 3100.

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



Event information

Confirmation of registration

Please note you will receive two separate emails in the form of a tax invoice at the time of payment and a confirmation email at registration completion.

Continuing Professional Development (CPD)

Attendance at the conference counts for 7 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

As a hybrid event, both in person and online, 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 Masterclass.

Networking function

Closing networking drinks will be held directly following the last session from 5:30pm in the Ballroom. The closing drinks are included in the Masterclass registration fee for delegates.

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/ masterclass lunch	Masterclass networking*
Full registration This registration option entitles one delegate to attend the entire event.	✓✓✓	✓✓✓	✓✓✓
Online full registration This registration option entitles one delegate to attend the entire event.	✓✓✓		

*Additional tickets to the Networking function can be purchased on the registration form.

Discounts

Early bird registration

All registrations received and paid on or before 22 May 2026 will be entitled to an early bird discount.

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

Group discounts

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


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

Register now!

Register online ▶

Register via form ▶

included in this brochure





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

1 Registration

Please see page 11 for registration inclusions.

Full registration – 7 CPD hours

	Member	New member*	Non-member
Face to face Early bird registration Register on or before 22 May 2026	<input type="checkbox"/> \$1,045	<input type="checkbox"/> \$1,440	<input type="checkbox"/> \$1,345
Face to face Standard registration Register after 22 May 2026	<input type="checkbox"/> \$1,245	<input type="checkbox"/> \$1,640	<input type="checkbox"/> \$1,545

Online registration – 7 CPD hours

	Member	New member*	Non-member
Online Early bird registration Register on or before 22 May 2026	<input type="checkbox"/> \$1,045	<input type="checkbox"/> \$1,440	<input type="checkbox"/> \$1,345
Online Standard registration Register after 22 May 2026	<input type="checkbox"/> \$1,245	<input type="checkbox"/> \$1,640	<input type="checkbox"/> \$1,545

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

Networking function

The closing networking drinks are INCLUDED in the registration fee for delegates attending the full Masterclass.

24 June 2026 at the Establishment Ballroom, Sydney

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

No. x tickets at \$80 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 \$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:



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