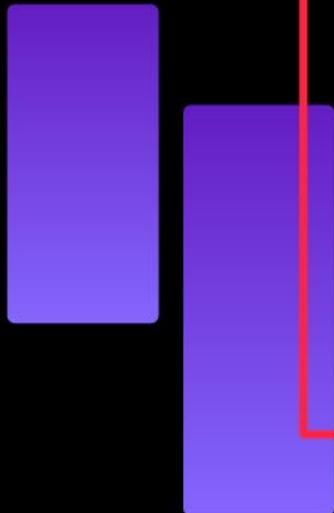


QLD Tax Forum



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

John Middleton, CTA, Australian Taxation Office (Co-Chair, Forum Organising Committee)

Jodie Robinson, CTA, McCullough Robertson (Co-Chair, Forum Organising Committee)

Amy Borrett, Deloitte

John Elliott, CTA, Strategic Edge Business Services

Nick Farr, RSM Australia

Rhiain Garrihy, CTA, Resolution Life

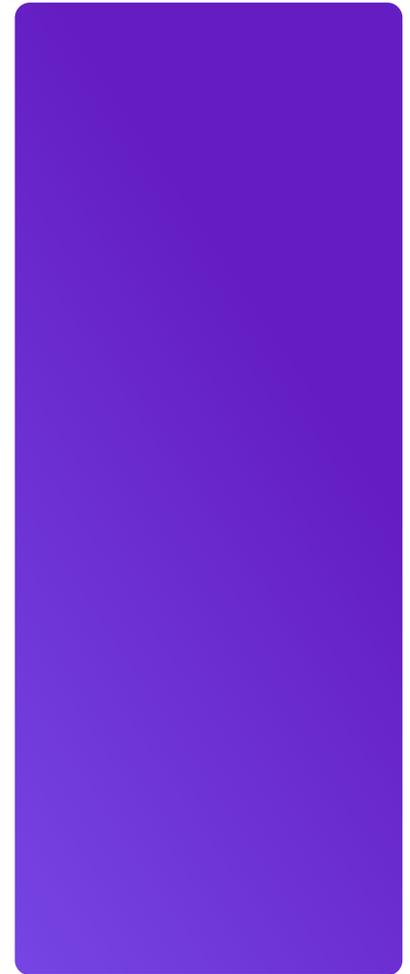
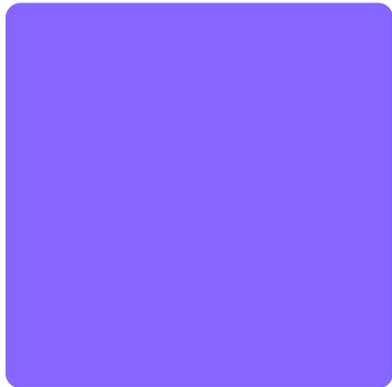
John Lean, Cooper Grace Ward Lawyers

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Karen Young, Flight Centre

Proudly sponsored by:





Welcome

The QLD Tax Forum returns in 2026 with a refreshed format, continuing to focus on the issues that matter most to you. Join us for two days of technical insights, thought-provoking discussion and valuable networking with peers at the event where Queensland's tax community connects.

This year's program features a full agenda of topical sessions designed for advisers working across private business and corporate tax, alongside a dedicated **Next Generation** stream introduced for 2026.

Hear from industry experts on the key issues shaping practice today, with practical sessions covering restructures and rollovers, franking credits, property development, navigating ATO disputes, personal services income and GST, as well as corporate topics including the Interest Limitation rules, Pillar Two, Country-by-Country Reporting and more.

Across both days, our keynote speakers will tackle some of the profession's biggest conversations, including tax reform with *Tax Wars* author **David Montani** and the implications of AI on the profession. Delegates will also hear from experienced practitioners in the inaugural '**Red Flag Round-Up**' panel, sharing practical insights from the front line of practice.

The new **Next Generation stream** has been designed specifically for emerging tax professionals, with sessions focused on navigating ATO disputes, identifying the real issue behind a client's question and building foundational technical capability through topics such as CGT fundamentals.

With **flexible registration options** the event offers opportunities to tailor your attendance while connecting with peers and building valuable professional networks.

We look forward to welcoming you to Brisbane for what promises to be an engaging and thought-provoking event.



John Middleton, CTA
Co-Chair, Forum Organising
Committee



Jodie Robinson, CTA
Co-Chair, Forum Organising
Committee

Early bird pricing offer
Register on or before Friday, 1 May to save!

Program at a glance

KEYNOTES

Keynote address – The bluster, bull dust and bedlam behind Australia’s tax reform gridlock

Ethics beyond the algorithm – The tools may be faster but the ethics remain the same

Red flag round up

SME

Current issues in restructures and rollovers

Let’s be frank – The new reality for Franking Credits

What’s hot in property – Property developer, property investor or leisure property?

Navigating ATO disputes in a changing environment – Part I

2026 Budget analysis – What actually matters for advisers (and what doesn’t)

PSI in Practice – Back to fundamentals after PCG 2025/5

GST – Basics that are never actually basic

Payroll Tax – The hidden cost of people

Losses – “We’ve got losses, so we’ll use them.”

CORPORATE

Pushing the limits – Navigating the Interest Limitation rules

Beyond borders – Pillar Two update

CbCR in the spotlight

Tax Governance in practice

ATO update for corporates

NEXT GENERATION

Navigating ATO disputes in a changing environment – Part II

How to spot the real issue behind the client question

Borrowing, interest deductibility & debt events – Interest isn’t automatic and debt doesn’t just disappear ... The year end journal trap clinic

CGT 101 – But only the parts that keep tripping us up

Technical program

Day 1 Thursday, 28 May 2026

Time *AEST	Session		
8:00 – 8:45am	Registration		
8:45 – 9:00am	Welcome and President’s address Speakers: Jodie Robinson, CTA, Co-Chair Forum Organising Committee, Tim Sandow, CTA, President, The Tax Institute		
9:00 – 10:00am	Session 1: Keynote address – The bluster, bulldust and bedlam behind Australia’s tax reform gridlock Speaker: David Montani, CTA, Grant Thornton Australia’s tax system is widely acknowledged as complex, inefficient and overdue for reform, yet meaningful change remains stubbornly elusive. In this keynote presentation, <i>Tax Wars</i> author David Montani shares his expert insights from inside the tax reform battleground and discusses reform rhetoric versus political reality, including key takeaways from the 2026 budget. Drawing on the central themes of <i>Tax Wars</i> , David will unpack the forces shaping Australia’s reform trajectory, what recent policy decisions reveal about government priorities, and critically, what this means for advisers navigating uncertainty and guiding their clients in an evolving tax landscape.		
10:00 – 10:30am	Morning tea		
	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>SME Stream</p> <p>10:30 – 11:30am Session 2A: Current issues in restructures and rollovers Speaker: Linda Tapiolas, CTA, Cooper Grace Ward Lawyers</p> <p>Restructure and rollover relief remains critical to facilitating commercial change, but technical missteps, integrity constraints and increasing ATO scrutiny mean relief is no longer a given, even where transactions appear to fall squarely within the law.</p> <p>This session will explore:</p> <ul style="list-style-type: none"> • The scope and limitations of key rollover provisions in subdivisions 122-A to 124-M, including areas of uncertainty and practical risk • The evolving application of B2B back to back rollover relief and where intended outcomes may be challenged • Demerger relief in practice, including integrity provisions, structural constraints and ATO focus areas; and • Emerging compliance themes and what advisers must do to ensure restructures withstand scrutiny. </td> <td style="width: 50%; vertical-align: top;"> <p>Corporate Stream</p> <p>Session 2B: Pushing the limits – Navigating the Interest Limitation rules Speakers: Mike Hennessey, CTA, EY, Glenn O’Connell</p> <p>Australia’s interest limitation rules are expanding in scope and complexity, with recent ATO guidance signalling a clear intent to test arrangements well beyond large multinational groups – placing many private and SME structures firmly within reach.</p> <p>This session will discuss:</p> <ul style="list-style-type: none"> • The application of the Debt Deduction Creation Rules (DDCR) and implications of recent ATO guidance including PCG 2025/2 on restructures • Key interpretative issues arising from TR 2025/2, including under PCG 2025/D2 and its practical implications for related-party financing • Integrity concerns highlighted in PCG 2025/3, including arrangements involving capital raised to fund franked distributions; and • Practical steps to identify risk areas and ensure financing arrangements can withstand ATO scrutiny. </td> </tr> </table>	<p>SME Stream</p> <p>10:30 – 11:30am Session 2A: Current issues in restructures and rollovers Speaker: Linda Tapiolas, CTA, Cooper Grace Ward Lawyers</p> <p>Restructure and rollover relief remains critical to facilitating commercial change, but technical missteps, integrity constraints and increasing ATO scrutiny mean relief is no longer a given, even where transactions appear to fall squarely within the law.</p> <p>This session will explore:</p> <ul style="list-style-type: none"> • The scope and limitations of key rollover provisions in subdivisions 122-A to 124-M, including areas of uncertainty and practical risk • The evolving application of B2B back to back rollover relief and where intended outcomes may be challenged • Demerger relief in practice, including integrity provisions, structural constraints and ATO focus areas; and • Emerging compliance themes and what advisers must do to ensure restructures withstand scrutiny. 	<p>Corporate Stream</p> <p>Session 2B: Pushing the limits – Navigating the Interest Limitation rules Speakers: Mike Hennessey, CTA, EY, Glenn O’Connell</p> <p>Australia’s interest limitation rules are expanding in scope and complexity, with recent ATO guidance signalling a clear intent to test arrangements well beyond large multinational groups – placing many private and SME structures firmly within reach.</p> <p>This session will discuss:</p> <ul style="list-style-type: none"> • The application of the Debt Deduction Creation Rules (DDCR) and implications of recent ATO guidance including PCG 2025/2 on restructures • Key interpretative issues arising from TR 2025/2, including under PCG 2025/D2 and its practical implications for related-party financing • Integrity concerns highlighted in PCG 2025/3, including arrangements involving capital raised to fund franked distributions; and • Practical steps to identify risk areas and ensure financing arrangements can withstand ATO scrutiny.
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Technical program

Day 1 Thursday, 28 May 2026 *continued*

Time *AEST	SME Stream	Corporate Stream
11:30am-12:30pm	<p>Session 3A: Let's be frank – The new reality for Franking Credits Speaker: Alex Whitney, CTA, West Garbutt</p> <p>Franking credits remain firmly in the ATO's sights with recent active compliance activity signalling a renewed focus on arrangements.</p> <p>This session will examine:</p> <ul style="list-style-type: none">• The ongoing relevance and practical application of the 45-day holding period rule• The types of arrangements attracting attention and how these issues are presenting in practice; and• How to assess franking credit risks when they come across your desk – When to proceed, restructure or reconsider.	<p>Session 3B: Beyond borders – Pillar Two update Speaker: Chris Stewart, PwC</p> <p>This session will provide critical insights to help navigate the first wave of Pillar Two compliance with confidence. Including:</p> <ul style="list-style-type: none">• The transition from implementation to compliance including local lodgement requirements and timing considerations• The ATO's transitional compliance approach and implications of recently finalised guidance, including relevant PCGs• Key technical and practical challenges emerging as groups prepare for their first Pillar Two lodgements• Associated structuring, reporting and governance issues arising from new global minimum tax framework. he changes for non-US head quartered entities in the side-by-side package? and• This will include an extension to the temporary safe harbour and guidance on the permanent safe harbour.
12:30-1:30pm	Lunch	



Technical program

Day 1 Thursday, 28 May 2026 continued

Time *AEST	SME Stream	Corporate Stream
1:30 – 2:30pm	<p>Session 4A: What’s hot in property – Property developer, property investor or leisure property? Speaker: Sian Sinclair, CTA, Grant Thornton</p> <p>As property values rise and structures evolve, the ATO and courts are increasingly challenging whether activities are truly investment, development or something in between, with significant tax consequences depending on where the line is drawn. This session will discuss:</p> <ul style="list-style-type: none"> • Recent ATO guidance, including TA 2026/1 and PCG 2025/D7, and what it signals about compliance focus areas • The critical distinction between property development and mere subdivision – and when capital gains treatment may be at risk • Joint venture versus partnership – Why the legal form and underlying substance matter for tax outcomes; and • Key cases, including Morton and recent ART decisions, and their implications for when investment properties may be treated as trading stock. 	<p>Session 4B: CbCR in the spotlight Speaker: to be announced</p> <p>With the first short-form local file lodgements fast approaching and public country-by-country reporting now a reality, multinational groups face heightened transparency and little margin for error. This session will discuss:</p> <ul style="list-style-type: none"> • Preparing for the first short-form local file lodgements, including timing, scope and practical challenges • Disclosure expectations for restructures and how much detail is required to satisfy ATO requirements • Early insights and lessons learned from December and January year-end lodgements • The implications of public CbCR and the increased reputational and compliance risks for corporate groups
2:30 – 3:30pm	<p>Session 5A: Navigating ATO disputes in a changing environment – Part I Speakers: Fletch Heinemann, CTA, HLS Tax Law, Sarah Lancaster, HLS Tax Law</p> <p>The ATO dispute landscape for SME groups has shifted. Reviews are starting earlier, information requests are broader and more forensic, and restructures and governance arrangements are being tested against commercial reality – not just technical form.</p> <p>The session will walk through the dispute lifecycle – from first contact and information requests through to position papers, assessments and objections – with a focus on managing scope, controlling narrative and avoiding unnecessary escalation. We will also address the commercial realities: cost, settlement posture, and managing client expectations in a higher-scrutiny environment.</p> <p>Designed for accountants and lawyers advising SME groups, this session provides practical guidance to help you identify emerging risk, strengthen governance before issues arise, and position disputes early to reduce time, cost and reputational exposure.</p>	<p>Session 5B: Tax Governance in practice Speaker: Kara Singleton, ATI, Deloitte</p> <p>ATO assurance expectations are rising, and governance is no longer a “set and forget” exercise. This practical session focuses on how organisations can confidently move toward Stage 3 with real-world implementation strategies. This session will discuss:</p> <ul style="list-style-type: none"> • ATO assurance reviews and the push from Stage 2 to Stage 3 • The design and implementation of stage 3 requirements • Managing the cost of testing and when external assurance is needed • Practical pathways to move from Stage 1 or 2 to Stage 3 • Governance as an ongoing investment, not a compliance tick-box; and • The relevance of the Annual GST Return – lessons from first-year lodgements

Technical program

Day 1 Thursday, 28 May 2026 continued

Time *AEST	SME Stream	Corporate Stream
3:30–4:00pm	Afternoon tea	
4:00–5:00pm	<p>Session 6A: 2026 Budget analysis – What actually matters for advisers (and what doesn't)</p> <p>Speaker: Julie Abdalla, FTI, The Tax Institute</p> <p>Join The Tax Institute's Julie Abdalla for an insightful session on the budget. Julie will discuss:</p> <ul style="list-style-type: none">• What's changed• What was signaled for change but not yet legislated• What creates immediate client questions, and• What needs to be watched over the next few months.	<p>Session 6B: ATO update for corporates</p> <p>Speaker: David Stevenson, Australian Taxation Office</p> <p>Assistant Commissioner, David Stevenson discusses the latest ATO focus areas for corporate tax professionals.</p>



Networking function

Join your colleagues and network with our esteemed speakers over cocktails and canapes by the pool during the forum's networking function.

Date: Thursday, 28 May 2026

Time: 5:00–7:00pm

Venue: Poolside, The Westin Brisbane

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

Dress: Business casual

Technical program

Day 2 Friday, 29 May 2026

Time *AEST	Session		
8:00 – 8:30am	Registration		
8:30 – 9:30am	<p>Session 7: Ethics beyond the algorithm – The tools may be faster but the ethics remain the same Speaker: Tracey Dunn, EY</p> <p>Ethical issues in tax practice rarely arrive labelled “ethical”. They show up as time pressure, client demands, commercial tension, imperfect information – and increasingly, technology-enabled shortcuts. This plenary reframes ethics as a daily practice discipline: how we make good decisions, document them properly, and protect clients, teams and firms when judgement is tested.</p> <p>AI may be the headline, but the underlying question is timeless: how do we keep professional judgement, objectivity and integrity ahead of speed and convenience?</p> <ul style="list-style-type: none"> • Technology as an accelerant – AI, automation and templates: where risk concentrates and how to keep a human-in-the-loop • Hot-topic risk patterns, including over-reliance, false certainty, shortcuts, and the danger of skipping verification • The recurring fundamentals, such as competence and due care, confidentiality, professional behaviour, and how they show up day-to-day; and • What “good” looks like on file – Documenting reasoning, assumptions, sources, and review steps to stay defensible. 		
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9:30 – 10:30am	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Session 8A: PSI in Practice – Back to fundamentals after PCG 2025/5 Speaker: Natasha Wilson, ATI, Vincents</p> <p>Personal services income is a “fundamentals” topic, if you get the classification and the tests right, and most downstream risk falls away.</p> <p>This session refreshes the PSI framework and then overlays what PCG 2025/5 means in practice, including the ATO’s renewed focus on arrangements that divert, retain or split PSI in ways that may not align with the commercial reality.</p> <ul style="list-style-type: none"> • PSI 101 – Identifying PSI vs business income, and why labels like “ABN”, “company” or “GST registered” don’t decide the outcome • The PSB pathway – The results test, the 80% rule, and when the other PSB tests (and PSB determinations) matter • If PSI applies – Attribution outcomes and the deduction “trip points” advisers still get caught on • PCG 2025/5 in practice – What the renewed ATO focus means, and how to manage the Part IVA risk when structures are used to “deal with” PSI; and • High-risk patterns to spot early – Unjustified profit retention, income splitting, diversion to loss entities, and uncommercial remuneration. </td> <td style="width: 50%; vertical-align: top;"> <p>Session 8B: Navigating ATO disputes in a changing environment – Part II Speakers: Adria Askin, CTA, McCullough Robertson, David Hughes, CTA, McCullough Robertson</p> <p>This session focuses on the fundamentals that keep you (and your file) safe when a matter becomes contentious. How to develop and maintain clean engagement habits, review-ready workpapers, and evidence that holds up months (or years) later. What should your practical toolkit and “risk map” look like for the issues that most often come back to haunt advisers.</p> <ul style="list-style-type: none"> • The fundamentals of not getting hurt (identifying the scope, reliance on information, confirmation of facts, file notes) • Review-ready workpapers and what “good” looks like from source documents, cross-referencing, and clear logic trails • Evidence that survives scrutiny such as contemporaneous records, governance material, and how to avoid “reconstructed” narratives • Responding to ATO information requests and how to triage, manage deadlines, create your “file”, and identify escalation triggers • Preparing clients, managing messaging, and keeping the record straight; and • The “you’ll be blamed for this later” risk map </td> </tr> </table>	<p>Session 8A: PSI in Practice – Back to fundamentals after PCG 2025/5 Speaker: Natasha Wilson, ATI, Vincents</p> <p>Personal services income is a “fundamentals” topic, if you get the classification and the tests right, and most downstream risk falls away.</p> <p>This session refreshes the PSI framework and then overlays what PCG 2025/5 means in practice, including the ATO’s renewed focus on arrangements that divert, retain or split PSI in ways that may not align with the commercial reality.</p> <ul style="list-style-type: none"> • PSI 101 – Identifying PSI vs business income, and why labels like “ABN”, “company” or “GST registered” don’t decide the outcome • The PSB pathway – The results test, the 80% rule, and when the other PSB tests (and PSB determinations) matter • If PSI applies – Attribution outcomes and the deduction “trip points” advisers still get caught on • PCG 2025/5 in practice – What the renewed ATO focus means, and how to manage the Part IVA risk when structures are used to “deal with” PSI; and • High-risk patterns to spot early – Unjustified profit retention, income splitting, diversion to loss entities, and uncommercial remuneration. 	<p>Session 8B: Navigating ATO disputes in a changing environment – Part II Speakers: Adria Askin, CTA, McCullough Robertson, David Hughes, CTA, McCullough Robertson</p> <p>This session focuses on the fundamentals that keep you (and your file) safe when a matter becomes contentious. How to develop and maintain clean engagement habits, review-ready workpapers, and evidence that holds up months (or years) later. What should your practical toolkit and “risk map” look like for the issues that most often come back to haunt advisers.</p> <ul style="list-style-type: none"> • The fundamentals of not getting hurt (identifying the scope, reliance on information, confirmation of facts, file notes) • Review-ready workpapers and what “good” looks like from source documents, cross-referencing, and clear logic trails • Evidence that survives scrutiny such as contemporaneous records, governance material, and how to avoid “reconstructed” narratives • Responding to ATO information requests and how to triage, manage deadlines, create your “file”, and identify escalation triggers • Preparing clients, managing messaging, and keeping the record straight; and • The “you’ll be blamed for this later” risk map
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Technical program

Day 2 Friday, 29 May 2026 *continued*

Time *AEST	SME Stream	Next Generation Stream
10:30–11:00 am	Morning tea	
11:00am–12:00pm	<p>Session 9A: GST – Basics that are never actually basic Speakers: Louis Carney, RSM Australia, Sam Mohammad, RSM Australia</p> <p>GST is often treated as “tick-the-box” – but the “basics” are where advisers still get caught.</p> <p>This session revisits the core GST framework and shines a light on the rules that are often forgotten, glossed over, or applied by habit, creating avoidable risk in everyday SME work.</p> <ul style="list-style-type: none"> • Registration and enterprise fundamentals – When you’re really carrying on an enterprise, group/entity boundaries, and why this matters • Taxable supply vs GST-free vs input taxed supplies • Common traps in applying the going concern provisions • Is your client intending to use the margin scheme later? What information do they need to get now? • Creditable purpose & apportionment – Mixed-use expenses, private components, and “close enough” methods that don’t hold up; and • A checklist of the recurring ‘gotchas’ to test on every SME file as a part of practical GST hygiene. 	<p>Session 9B: How to spot the real issue behind the client question Speaker: Tom Walrut, FTI, Cooper Grace Ward Lawyers</p> <p>Clients rarely ask the “right” question, they ask the question that feels immediate. Our value as tax adviser’s is diagnosing what’s really going on. What is the hidden tax issue, the commercial driver, the missing facts, or the risk that will surface later?</p> <p>This session is a practical toolkit for advisers to move from answering questions to solving problems.</p> <ul style="list-style-type: none"> • From question to diagnosis and how to separate symptoms from the underlying issue (and avoiding the “quick answer” trap) • The fact-finding framework (who/ what/ when/ why) – The documents to request, and the missing pieces that can change outcomes • Issue-spotting and recognising common “hidden” themes (entity mismatch, timing, characterisation, connected parties, cash vs accrual reality) • Risk triage – Determining what’s urgent vs important, and how to frame risk without alarming the client • How to ask better questions, reset assumptions, and manage expectations in plain English • Turning analysis into advice and the process of moving from the initial question, to options, recommendations, and clear next steps; and • Protecting the file (and yourself) – Documenting assumptions, scope boundaries, and why the client’s original question wasn’t the real one.



Technical program

Day 2 Friday, 29 May 2026 continued

Time *AEST	SME Stream	Next Generation Stream
12:00-1:00pm	<p>Session 10A: Payroll Tax - The hidden cost of people Speakers: Liam Cooke, Qld Revenue Office, Luke Furness, Clayton Utz, leuan Murphy, QLD Revenue Office</p> <p>This session will guide you through the essentials of payroll tax. Covering the basics, key updates for the 2026 financial year, and the compliance model, this session will highlight common pitfalls, detection methods, and practical strategies to stay on top of your obligations.</p>	<p>Session 10B: Borrowing, interest deductibility & debt events - Interest isn't automatic and debt doesn't just disappear ... The year end journal trap clinic Speaker: Stephen Holmes, CTA, WMS Chartered Accountants</p> <p>Borrowing is routine but the tax outcome rarely is. Interest deductibility depends on the facts - why the funds were borrowed, how they were actually used, and what evidence exists to support the nexus. Then come the "debt events" that tax advisers can often treat as accounting tidy-ups: waivers, write-offs, refinances, loan variations and forgiveness.</p> <p>This session is a practical trap clinic that connects the legal/commercial reality to the tax rules, with a focus on the issues that quietly create (or mask) problems and later become painful to unwind.</p> <ul style="list-style-type: none">• Interest isn't automatic - What are the core deductibility tests, how to trace and identify use-of-funds, and what breaks the nexus• Timing and substantiation - When are deductions actually available, and what to have on file• Related-party funding reality checks - Documentation, terms, and when "it's just a loan" becomes a tax issue• Debt events that change everything - The impact of variations, releases, waivers, refinancing, forgiveness and "debt doesn't just disappear; and• The debt forgiveness rules - The practical flow-on impacts for related parties that advisers sometimes miss (losses, cost bases, future deductions.)
1:00-2:00pm	Lunch	

Technical program

Day 2 Friday, 29 May 2026 continued

Time *AEST	SME Stream	Next Generation Stream
2:00 – 3:00pm	<p>Session 11A: Losses – We’ve got losses, so we’ll use them..” Speaker: Michael Garrone, CTA, Mage Advisory</p> <p>Clients hear “losses” and assume they can be cashed in whenever profits return. In practice, losses are conditional: the right entity must own them, the right tests must be satisfied, the activity and ownership history matters, and one “minor” action/restructure can quietly switch them off.</p> <p>This session is a practical guide to separating losses that are real and usable from losses that look good on paper but can’t be accessed when it counts.</p> <ul style="list-style-type: none"> • Losses aren’t a credit balance, tax advisers need to identify what type of loss exists (revenue vs capital) and where it sits (entity-by-entity), and what can and can’t be offset • How to prove the loss position – What records, calculations and assumptions you need before you tell a client their losses are “usable” • Company losses in the real world – Continuity vs “same or similar business” thinking, and the common ownership/activity changes that quietly deny access • Trust losses without the pain – Is there an Family Trust Election? What are the key trust loss tests? How important are historical distribution patterns, and documentation gaps that can trip you up • Restructures and group changes – How “small” changes (new shareholders, new income streams, entity swaps) can reset the loss story; and • Integrity and review risk flags and the patterns that attract attention and how to keep positions commercially coherent and defensible. 	<p>Session 11B: CGT 101 – But only the parts that keep tripping us up Speakers: Kara Bentley, Elda Legal, Natalie Cameron, CTA, Elda Legal</p> <p>CGT feels familiar ... Until a “standard” transaction throws up characterisation, timing, cost base or documentation issues that change the outcome.</p> <p>This session is a practical refresher on the CGT fundamentals that most often trip up advisers in SME files, with a focus on the questions you need to ask early and the evidence you need to support the position.</p> <ul style="list-style-type: none"> • Asset and transaction characterisation – CGT vs revenue, active assets vs passive, and when it changes • Timing traps – HOA vs contract date vs settlement, earn-outs, options, and when the event actually happens • Cost base and records – Common omissions, improvement costs, incidental costs, and reconstructing evidence when records are thin • Main residence & property “usual suspects” – Partial use, foreign residents, absence rules, subdivisions, and mixed-purpose properties • CGT discount issues – Eligibility and the “surprising” exclusions that get missed • Small business CGT concessions (high-level triage) – Basic gateways, red flags, and when to escalate; and • Review-ready CGT files – A checklist of information and evidence to keep on record to simplify future CGT calculations and reduce audit risk.
3:00 – 3:30pm	Afternoon tea	
3:30 – 4:30pm	<p>Session 12: Red flag round up Panellists: Sally Preston, CTA, Smart Solutions Tax and Business Advisory Facilitator: Jodie Robinson, CTA, McCullough Robertson</p> <p>Advising private client groups is rarely just about technical correctness. It involves navigating incomplete records, family dynamics, legacy structures, commercial pressure and increasing ATO scrutiny.</p> <p>This practical panel session focuses on real-world experiences in dealing with private clients, the scenarios that regularly arise, the red flags that advisers encounter in practice, and how those issues are best managed before they become disputes.</p> <p>Rather than a purely technical analysis, the discussion will centre on how matters actually unfold, including: what clients say (and don’t say), where documentation gaps appear, how risk is identified late, and how advisers balance technical integrity with commercial and relational realities.</p>	
4:30pm	Forum close	

Presenters

Julie Abdalla, FTI, is the Head of Tax & Legal at The Tax Institute. Julie has practiced in the tax teams of Big 4 and top tier law firms in Sydney and Melbourne, and at an international law firm in London. She has expertise in law and policy across a broad range of taxes and industry sectors. Julie is driven to achieve holistic tax reform, and has the depth of knowledge to advocate for members and the betterment of the tax system. Julie leads the Tax Policy & Advocacy team and has oversight of The Tax Institute's National Technical and State Taxes Committees comprised of over 150 volunteers. She represents The Tax Institutes in several external forums including the ATO's National Tax Liaison Group and the Australian Treasury's Tax Treaty Advisory Panel. Julie provides strategic and technical advice to Government and other stakeholders, and has appeared as an expert witness in several Senate Committee inquiries.

Adria Askin, CTA, is a Senior Associate in the McCullough Robertson team with a number of years' experience acting for clients with respect to ATO compliance activity, and providing technical advice. Adria practices in the Federal tax space, including the areas of income tax and capital gains tax (inbound and outbound tax considerations), as well

as superannuation and customs and excise duty. In both her advice and controversy work, Adria is focused on achieving practical and commercial results for her clients, and ensuring that litigation matters are quickly and inexpensively resolved wherever appropriate and possible.

Kara Bentley is a skilled lawyer specialising in tax, corporate, commercial law and private advisory services. Kara is passionate about delivering practical, commercial solutions tailored to her clients' taxation and business needs.

Natalie Cameron, CTA, is an accomplished lawyer and Chartered Tax Adviser with eight years of expertise in taxation and private advisory services tailored for small business owners and high-net-worth individuals. Diligent, dedicated, and strategic in her approach, Natalie's practice revolves around key areas such as taxation, structuring, asset protection, succession planning, and mergers & acquisitions.

Louis Carney is a highly experienced Director in Indirect Tax, based in Brisbane. With more than 20 years of international and domestic experience, he specialises in helping businesses navigate complex GST, VAT and customs duty obligations. Louis's expertise spans general indirect tax

consulting, tax governance, compliance processes and the use of advanced tax technology to improve efficiency, enhance accuracy and reduce risk.

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.

Michael Garrone, CTA, is a trusted figure in the industry with decades of experience across business, accounting and tax. Known for his pragmatic approach, delivering clear advice and practical solutions that work; Michael is valued for his high level of care and responsiveness with clients and practitioners alike. Michael is regarded as unique in the

industry; his combination of expertise, experience and genuine regard for executing the most favourable outcome for his clients is rare. Michael aims to be accessible and easy to work with; providing options, explaining in clear terms and empowering clients to make informed decisions. Michael is a Business Owner, Chartered Tax Adviser and Tax Agent

Fletch Heinemann, CTA, is a principal at HLS Tax Law who specialises in helping clients and their advisers with tax and customs issues. Fletch has a particular interest in helping clients navigate ATO reviews and audits. Fletch and his team help clients with advice, private rulings, objections and litigation. Fletch has also presented sessions at The Tax Institute's Queensland seminars and national conferences and has published papers on topical tax and customs issues.

Michael Hennessey, CTA, is a Partner at EY Brisbane with more than 35 years experience. He has been involved in a number of significant merger and acquisitions and joint venture structuring transactions including funding issue, as well as providing ongoing tax advice and tax compliance services to local and international clients.

Presenters

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.

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 Review 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.

Sarah Lancaster is a principal at HLS Tax Law. She advises and represents taxpayers in a wide range of tax disputes, including those involving the ATO and State Revenue authorities. Her technical expertise covers various areas such as income tax, international tax, GST, payroll tax, stamp duty, and customs duty.

Sam Mohammad is a Partner in RSM Australia's Indirect Tax Practice in Brisbane. Sam has 20 years experience in providing practical GST, fuel tax credit and stamp duty advice across a broad range of sectors, including property and development. Sam has been directly involved in major M&A deals and government asset sales (including the provision of tax and duty structuring and optimisation advice), successfully preparing GST private binding ruling requests on complex matters and assisting clients through indirect tax audits and reviews by revenue authorities.

David Montani, CTA, is National Head of Technical Tax – Private Enterprise at Grant Thornton. He has over 30 years' experience, with over 20 of those in specialist tax advisory. In his role with GT, David delivers practical tax training, mentors staff, provides tax technical support on significant client engagements, and assists with quality and excellence protocols.

Glenn O'Connell advises on the tax aspects of transactions, including mergers and acquisitions, property and infrastructure. In the property sector, Glenn has advised on a range of transactions and projects including commercial office, industrial, health, hotels, build to rent accommodation, social housing projects, student accommodation, manufactured housing and retirement living. Glenn has acted for investors, developers, fund managers and government agencies on a range of projects.

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.

Jodie Robinson, CTA is an Accredited Tax Law Specialist and Special Counsel in the tax team with McCullough Robertson Lawyers. Jodie is passionate about providing clients with results-driven, commercial advice and solutions for their taxation and business needs. Jodie regularly advises on the tax consequences of the sale of significant businesses, business restructures, including applicable rollovers and duty exemptions, and holding company interpositions. Jodie also assists clients and their advisors in obtaining private binding rulings and dealing with payroll tax self-review audits.

Sian Sinclair, CTA, is a Partner in the Tax Group and the current Brisbane Office Chair for Grant Thornton Australia. Prior to that, she held both National and Global leadership roles in the Real Estate & Construction Industry Group with Grant Thornton. Sian's expertise draws on 30 years' experience in taxation, accounting and general business consulting. Advising clients from the start-up and growth phases of business through to those looking to realise their wealth via

Presenters

exit strategies. Her input is focused and practical with real insight into the issues impacting businesses in the industry, with deep experience managing tax risk for large private groups, advising on significant transactions and group consolidations. Sian oversees the compliance and planning needs of many Australian and international business groups in the real estate and construction sector.

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.

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

Chris Stewart, ATI, is a Partner at PwC with over 20 years experience in

providing corporate and international tax advice and compliance services to listed, private and foreign-owned multinational organisations across a variety of industries. Chris has extensive experience in advising on cross-border investment, corporate restructuring, mergers and acquisitions and income tax reporting, and leads PwC Australia's Pillar Two team. Chris is a member of Chartered Accountants Australia and New Zealand and is admitted as a Legal Practitioner in Queensland.

Linda Tapiolas, CTA, is a Partner in the Cooper Grace Ward Lawyers Commercial team. She provides a range of support services to accountants, financial planners, and other professional advisers. This includes technical advice on complex tax, CGT and Div 7A issues, as well as acting on business sales and acquisitions to ensure clients achieve commercial and tax-effective outcomes. Prior to joining Cooper Grace Ward, Linda worked as an accountant for 18 years advising clients on capital gains, business acquisitions and restructuring. She also conducted seminars and training sessions on various topics including CGT small business concessions.

Tom Walrut, FTI, is a Special Counsel at Cooper Grace Ward Lawyers experienced in providing tax advice to clients on both State and Federal tax issues. Tom primarily works with SME clients in a broad range of industries advising on

tax planning, transactional matters, structuring and general commercial matters. He also regularly acts for clients in taxation objections and disputes with both State and Federal Revenue Authorities.



Venue and accommodation



The Westin Brisbane

111 Mary St, Brisbane City QLD 4000

The Westin Brisbane is centrally located in the heart of the city, just a short walk from Queen Street Mall, Eagle Street Pier and Brisbane City Botanical Gardens. Enjoy a riverside stroll up to Howard Smith Wharves or across the Story Bridge to Kangaroo Point Cliffs. Southbank, Queensland Museum, QPAC and the Brisbane Convention & Exhibition Centre are an easy walk away.

Getting there

Ideally situated in the heart of central Brisbane's business and shopping districts, this hotel is conveniently located within a 30-minute drive of Brisbane Airport with the closest bus stop a two-minute walk to Charlotte Street.

Parking

Valet and onsite parking are available from \$60 p/day at The Westin Brisbane. Alternatively, offsite parking is available a short walk at [Wilson Parking](#) on Mary Street.

Accommodation

Retreat to The Westin Brisbane and unwind with an extensive range of rooms and suites. Well-appointed suites complemented with luxurious amenities are designed with your comfort and convenience in mind. From the chic Renewal Suites, which include Westin Club access and impeccably appointed guest rooms, you'll find everything you need for a relaxing stay in Brisbane.

Please note the hotel booking and cancellation policies prior to booking in your accommodation. 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 event 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 event including the Networking Function.

Special dietary and accessibility requirements

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

Networking function

A Networking function will be held directly following the last session on Thursday from 5.00pm, poolside at The Westin Brisbane. 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.

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/ forum lunches	Forum Networking function*
Full registration This registration option entitles one delegate to attend the entire event.	✓✓✓	✓✓✓	✓✓✓
Employer registration This registration option allows one registration to be shared between multiple attendees from the same firm.	✓✓✓		

*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 **Friday, 1 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 four full registrations (early bird or standard) and receive a fifth full registration for free. The free fifth registration must be of equal or of less value to the four paid registrations.

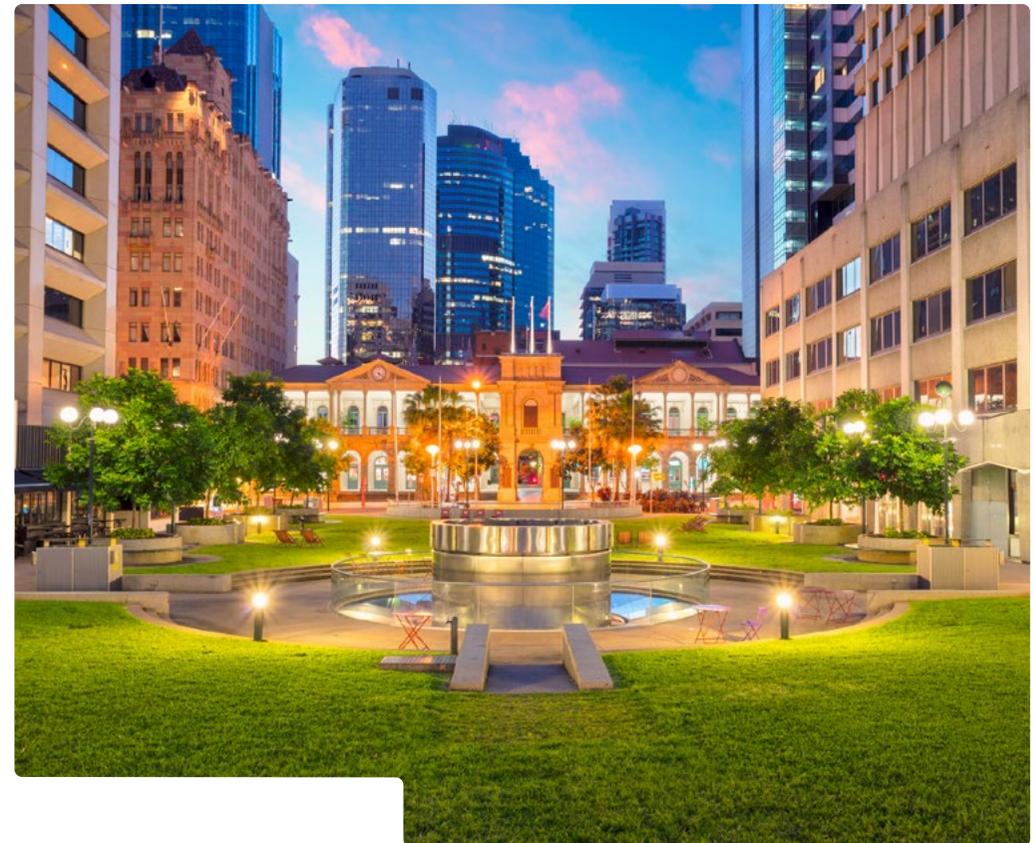
This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together. For further information please contact the national events team on 1300 829 338 or nationalevents@taxinstitute.com.au.

Register now!

Register online ▶

Register via form ▶
included in this brochure





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

1 Registration

Please see page 18 for registration inclusions.

Full registration – 12 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before Friday, 1 May 2026	<input type="checkbox"/> \$1,695	<input type="checkbox"/> \$2,090	<input type="checkbox"/> \$1,995
Standard registration Register after Friday, Friday, 1 May 2026	<input type="checkbox"/> \$1,895	<input type="checkbox"/> \$2,290	<input type="checkbox"/> \$2,195

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

Networking reception

The networking function is INCLUDED in the registration fee for delegates attending the full forum.

Thursday, 28 May 2026 poolside at The Westin Brisbane

- 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 \$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:

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:

DAY ONE – Thursday, 28 May 2026

- 10:30–11:30am Session 2A Session 2B
- 11:30am–12:30pm Session 3A Session 3B
- 1:30–2:30pm Session 4A Session 4B
- 2:30–3:30pm Session 5A Session 5B
- 4:00–5:00pm Session 6A Session 6B

DAY TWO – Friday, 29 May 2026

- 9:30–10:30am Session 8A Session 8B
- 11:00am–12:00pm Session 9A Session 9B
- 12:00–1:00pm Session 10A Session 10B
- 2:00–3:00pm Session 11A Session 11B
- 3:30–4:30pm Session 12A Session 12B

4 Payment summary

Registration fees \$

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

Total payable \$

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

5 Payment method

Please note: All registration payments must be made prior to the event, unless other arrangements have been made with The Tax Institute.

- Cheque payable to The Tax Institute** (in Australian dollars)
- Credit card** Card type: AMEX Visa Mastercard Diners

Name on card:

Card no.: Expiry date:

Cardholder's signature:

For our refund, cancellation and replacement policy, visit taxinstitute.com.au/professional-development/event-policy.

For event enquiries, please contact the National Events Team on **1300 829 338** or nationalevents@taxinstitute.com.au

For registration enquiries, please contact customeradmin@taxinstitute.com.au

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. [You can also request TTI's consultants to provide you with a copy of TTI's 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

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au

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 Employer Ticket types

Employer Tickets offer a flexible option for employers to send multiple attendees to an event. We have different options to suit you and your team.

	Classic	Plus	Premium	Tailored
Early bird on or before Friday, 1 May 2026	\$3,450	\$4,950	\$6,450	
Standard after Friday, 1 May 2026	\$3,650	\$5,150	\$6,650	
Best for	SME	Mid-Tier	Corporate	
Flexibility	Your choice of 20 sessions	Your choice of 40 sessions	Your choice of 60 sessions	Contact us to tailor a quote today for you and your team to attend multiple events.
Team attendance	Up to 5 attendees	Up to 10 attendees	Up to 15 attendees	
Session formats	Face-to-face	Face-to-face	Face-to-face	
Networking	5 networking passes	10 networking passes	15 networking passes	

All Employer Ticket attendees receive:

- Electronic access to download available technical papers and presentations
- Morning tea, lunch and afternoon tea
- CPD hours allocated according to attendee

1 session = 1 CPD hour per attendee

Session selection

- Coordinators will be contacted with a session selection form to complete on behalf of attendees, based on the Employer Ticket type selected.
- The session selection form must be completed in full to ensure proper allocation of CPD hours post-event.

1 Employer Ticket types

Promotional code:

Ticket type	Cost	No. of tickets	Sub-total
<input type="checkbox"/> Classic			
<input type="checkbox"/> Plus			
<input type="checkbox"/> Premium			
Total payable \$			

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 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:

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To register

Email customeradmin@taxinstitute.com.au

Mail Level 21, 60 Margaret Street, Sydney NSW 2000

Online taxinstitute.com.au

Join the conversation

-  [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
-  [instagram.com/thetaxinstitute_](https://www.instagram.com/thetaxinstitute_)

