Financial Services Taxation **Conference**

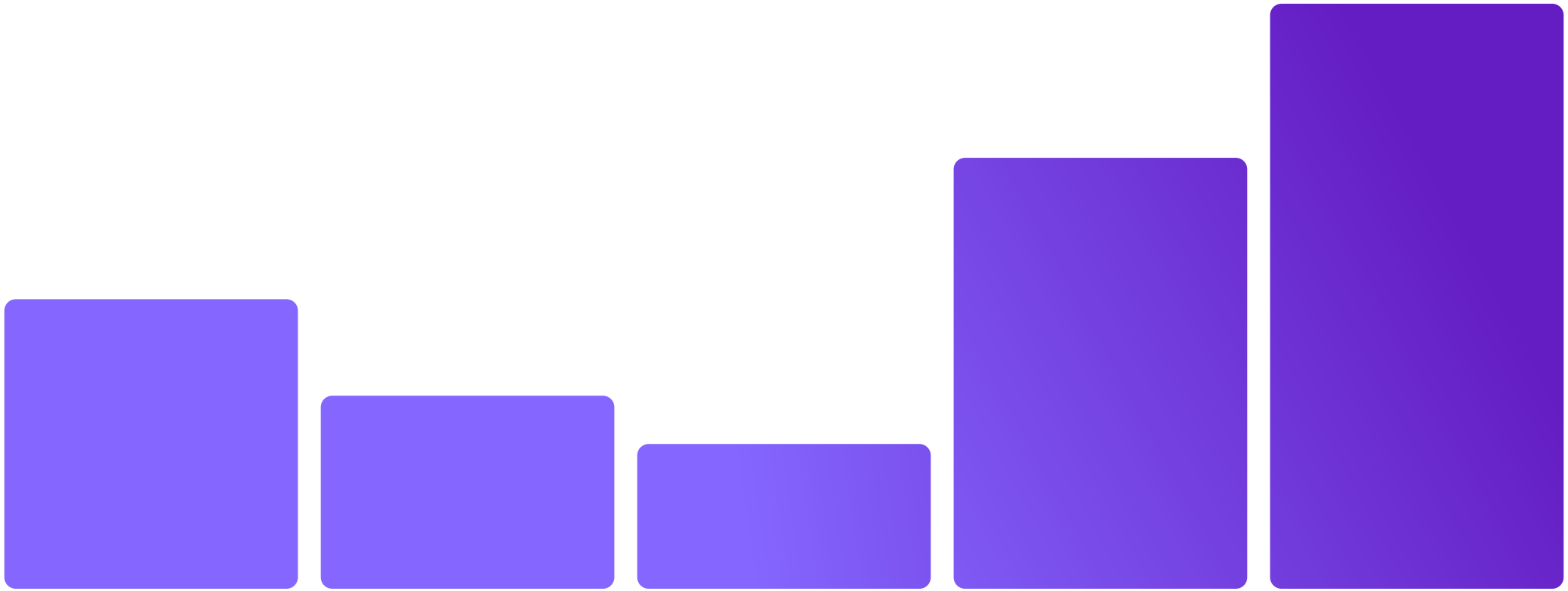
The Tax Institute



11-12 Mar 2027 ☆ CPD 12

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

Matt Osmond, CTA, Chair, Financial Services Taxation Conference Organising Committee
Michael Anderson, FTI, BDO
Michael Barbour, CTA, Westpac Banking Corporation
Michele Carmody, Colonial First State
Siew-Kee Chen, CTA, Deloitte
Matthew Eggins, La Trobe Financial
Antony Faisandier, Australian Taxation Office
Simon Jenner, CTA, EY
Dina Lander, 5 Selborne
Michael Potter, Business Council of Australia
John Salvaris, CTA, KPMG
Michelle Siu, Aware Super
Nicole Stratford, Barrenjoey
Simon Tucker, CTA, SW Accountants & Advisors
Steve Whittington, Ashurst





Early bird pricing offer
Register on or before Friday 12 February to save!

Welcome

On behalf of The Tax Institute and the Organising Committee, it gives me great pleasure to invite you to attend the 2027 Financial Services Taxation Conference, Australia's leading event for financial services taxation professionals, to be held on 11–12 March 2027 at Crown Sydney.

The financial services sector continues to operate in an increasingly complex environment shaped by significant tax reform, evolving international tax rules, heightened regulatory expectations and rapid technological change. Recent developments, including changes to capital gains tax and trust taxation, the debt deduction creation rules, growing scrutiny of cross-border arrangements and the continuing evolution of global investment structures, are creating both challenges and opportunities for tax professionals across the industry. At the same time, emerging technologies, digital assets, new payment systems and AI are transforming the way financial institutions operate and manage risk.

In developing this year's program, the Organising Committee has focused on the technical and practical issues that matter most to financial services tax professionals. The program is designed to help delegates connect technical developments with the practical decisions facing financial services businesses. Industry experts, advisers, policymakers and business leaders will share their technical expertise, practical experience and strategic insights.

Across two days, delegates will have the opportunity to explore a diverse range of topics through keynote presentations, technical sessions, panel discussions and industry-specific updates. Highlights include sessions on CGT and trust reforms, offshore financing and withholding tax, fund structures, tax disputes, debt deduction creation rules, market valuations, M&A transactions, tax incentives, governance and tax risk management, as well as dedicated roundtable discussions covering banking, insurance and wealth management. The program also looks ahead to the future, examining the evolving payments landscape, digital finance, AI-enabled risks and the broader economic outlook shaping the financial services sector.

Beyond the technical content, the conference provides a valuable opportunity to connect with peers, colleagues and industry leaders from across Australia, share experiences and discuss the challenges and opportunities facing the profession.

On behalf of the Organising Committee, I would also like to sincerely thank our speakers for generously contributing their time, expertise and insights to make this conference possible.

We look forward to welcoming you to Crown Sydney for two days of technical insight, practical discussion and connection with colleagues across the financial services tax community.



Matt Osmond, CTA
Chair, Conference Organising Committee

Technical program

Day 1 Thursday, 11 March 2027

Time	Session	
8:00–8:45am	Registration	
8:45–9:00am	Welcome and President's Address	
9:00–10:00am	**Session 1: Keynote Address** Gain a unique perspective from a key decision-maker at the forefront of the issues shaping the financial services sector.	
10:00–10:30am	Morning tea	
	Stream A	**Stream B**
10:30–11:30am	**Session 2A: Implementing the Capital Gains Tax Trust Reforms – What Matters, What Changes and What It Takes** Speakers: Jodie Bosler, State Street; Siew-Kee Chen, CTA, Deloitte The most significant capital gains tax trust reforms in a generation create complex technical issues and difficult implementation challenges across the industry. Combining technical analysis, case studies and practical industry insights, this session examines the issues that matter most, potential distortions in investor outcomes, and the pressure points in translating the rules into fund calculations, distributions and investor reporting. For investment managers, superannuation funds, custodians and other industry participants, this session provides a candid examination of the technical judgements required and a practical view of what implementation really takes, from policy through to the investor statement.	**Session 2B: Is it a Royalty? Outbound Payments in Financial Services After PepsiCo and TR 2026/2** Speaker: Cameron Blackwood, ATI, Corrs Chambers Westgarth The taxation of cross-border payments continues to present challenges for financial services organisations, particularly as technology, data and software become increasingly embedded in business operations. Using recent developments concerning software and royalty payments as a starting point, this session will explore the broader withholding tax landscape. It will consider the changing treatment of payments for software, data and technology, the interaction with Australia's international tax rules and recent judicial and administrative developments, and what these changes mean for businesses making cross-border payments.

Technical program

Day 1 Thursday, 11 March 2027 continued

Time	Session	
11:30am–12:30pm	**Session 3A: Raising Offshore Debt Withholding Tax-Free – Section 128F and Treaties** **Speaker: Bronwyn Kirkwood, CTA, Ashurst** Interest paid to offshore lenders can attract 10% withholding tax, making exemptions critical to funding costs. This session considers how Australian borrowers access section 128F, covering eligible bonds, syndicated loans and unit trust issuers, the public offer tests, and the associate rules that can void an entire facility. The session will also explore treaty exemptions for unrelated financial institutions dealing wholly independently, and examine any insights from the recent ATO focus on section 128F claims.	**Session 3B: Fund Structures Part 1 – Choosing the Right Structure in a Changing Environment** **Speaker: Jessika Heynen-Brookes, CTA, KPMG** Financial services organisations use a range of structures to accommodate different investment strategies, investor requirements and regulatory considerations. Understanding the tax implications of those structures is critical when establishing or reviewing an investment vehicle. This session will examine common domestic fund structures, including managed investment schemes, partnerships, trusts and corporate structures, and consider how these are being used across property, credit, equities and alternative asset funds. The discussion will explore the practical considerations involved in selecting and managing structures, including MIT, AMIT, CCIV and emerging investment models.
12:30–1:30pm	**Lunch**	
1:30–2:30pm	**Session 4A: Managing a Tax Dispute – From Risk to Resolution** **Speaker: Rimma Miller, ATI, Clayton Utz** Tax disputes can have significant financial, operational and reputational consequences for financial services organisations, making the management of the dispute process just as important as the underlying technical issue. Using a practical financial services case study, this session will explore the tax dispute lifecycle from identifying and assessing risk through to engagement with the ATO, evidence gathering, penalties, mediation, settlement and litigation. Particular focus will be given to issues commonly encountered in the sector, including the management of complex transaction evidence, significant or recurring tax positions, governance and escalation processes, interactions with assurance reviews, and the commercial implications of settlement decisions. The session will provide practical insights into managing disputes effectively while balancing technical, commercial, regulatory and reputational considerations, and will examine strategies for achieving the best outcomes in an increasingly scrutinised tax environment.	**Session 4B: Fund Structures Part 2 – Advanced Inbound and Outbound Planning** **Speaker: Liam Collins, CTA, PwC** This session will explore selected advanced tax considerations for inbound and outbound investment, including non-resident CGT and TARP, withholding tax, treaty access and Australia's international tax rules. Particular focus will be given to outbound structures, including CFCs, CLPs and foreign hybrid limited partnerships, and the interaction between US check-the-box elections and Australia's foreign hybrid rules, including irrevocable Australian elections and their consequences. Practical illustrations will highlight attribution and cross-border tax issues, together with governance and consistency in navigating investment structures.

Technical program

Day 1 Thursday, 11 March 2027 continued

Time	Session	
2:30 – 3:00pm	**Afternoon tea**	
3:00 – 4:00pm	**Session 5A: Navigating the Debt Deduction Creation Rules and the Third-Party Debt Test** Speaker: Chris Newsom, EY The debt deduction creation rules now apply before any thin capitalisation test, and they reach historical arrangements as well as new ones. This session unpacks how they deny deductions on related party debt used to fund acquisitions from associates, or dividends, distributions and other payments to associates. The session will then examine the third-party debt test, including its strict recourse, credit support and use-of-proceeds conditions, and the group-wide effects of choosing it. Finally, with the transition period complete, the focus will be on post-transition assurance, evidence and documentation requirements, and practical issues emerging from the application of the new rules. Attendees will gain practical insights into reviewing financing arrangements and preparing for ongoing ATO scrutiny.	**Session 5B: Market Value** Speakers: Marino Felice, PwC, Matt Osmond, CTA, PwC Market value is a concept that runs throughout Australia's income tax, GST and FBT laws. It is used to substitute for non-arm's length consideration, to test eligibility for concessions, to allocate cost bases and to value non-cash benefits and consideration. Understanding when market value is relevant, and how it should be determined, is critical to supporting tax positions and managing risk. This session will examine the statutory contexts relevant to the financial services sector in which market value arises, judicial and ATO guidance and the core commercial valuation principles that guide its determination.



Technical program

Day 1 Thursday, 11 March 2027 continued

Time	Session
4:00 – 5:00pm	**Session 6: The Future of Money – New Payments, New Risks** **Speaker: Michael Potter, Business Council of Australia** The way money moves, is stored and is exchanged is changing rapidly. From new payment systems and digital currencies to tokenisation, blockchain and the growing use of AI, these developments are creating new opportunities — and new challenges — for financial institutions, regulators and tax professionals. This session will explore the changing financial landscape and consider the tax implications of emerging forms of money, payment systems and financial intermediation. It will also examine the growing risks associated with scams, fraud and AI-enabled threats, and the role of tax professionals as the financial system continues to evolve.



Welcome reception

At the close of Day 1, we will be inviting delegates to enjoy some delectable canapes and drinks. This is your opportunity to network and exchange ideas with colleagues, peers and our esteemed presenters.

Date: Thursday, 11 March 2027

Time: From 5:00pm

Venue: CIRQ Rooftop Bar – Level 26, Crown Sydney

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

Dress: Business or business casual

Technical program

Day 2 Friday, 12 March 2027

Time	Session
8:30 – 9:30am	**Session 7: Financial Services Taxation and the Economic Outlook** **Speaker: Johnathan McMenamin, Barrenjoey** Economic conditions, capital flows, investment activity and changes in financial markets all have implications for the tax environment in which financial institutions operate. This session will provide an outlook on the economic and financial trends shaping the sector and explore what they may mean for financial services tax professionals. The discussion will connect the broader economic environment with issues such as investment, funding, capital allocation and tax policy, providing delegates with a broader perspective on the environment in which they are making tax and commercial decisions.
9:30 – 10:30am	**Session 8: Managing Tax Through Different Lenses – Technical, Commercial and Governance Perspectives** **Facilitator: John Salvaris, CTA, KPMG** The role of the tax function continues to evolve, with tax risk increasingly intersecting with broader questions of governance, reputation, commercial strategy and organisational risk. Bringing together perspectives from Heads of Tax, CFOs and Audit Committee members, this session will explore how tax is viewed at the senior leadership and Board level. What does the Board need from the tax function? How are significant tax risks and uncertain positions communicated? How should tax teams balance technical risk with commercial priorities? And how is the role of the tax function changing as the regulatory and technology environment evolves?
10:30 – 11:00am	**Morning tea**



Technical program

Day 2 Friday, 12 March 2027 continued

Time	Session	
	Stream A	**Stream B**
11:00am–12:00pm	**Session 9A: Financial Services M&A – The Tax Practitioner's Playbook** **Speakers: Hannah Hesse, FTI, KPMG; Chris Tang, KPMG** M&A remains a significant theme across the financial services sector, from strategic consolidation and bolt-on acquisitions to private capital investment and founder exits. For tax advisers, these transactions bring familiar M&A issues together with some distinctly financial services complexities. This session will use practical examples to explore the transaction lifecycle, including: • Diligence and risk management: recent experience in complex take private transactions to design due diligence programs to meet timetable, governance and risk management factors, including when they matter to pricing and deal terms, and where W&I or specific tax insurance can bridge the gap • Getting the structure right: insights on how the structure of the transaction impacts the tax outcomes and work required, in particular consideration of schemes of arrangement, class rulings, permitted dividends, funding, founder rollovers, clear exit and GST recovery • Transaction design: dealing with transfers under the *Financial Sector (Transfer and Restructure) Act 1999* and their tax and GST consequences • Separation challenges: how changes in transacting parties are changing the face of Australian M&A, including private capital and sovereign wealth entrants into the Australian financial services market, and the related income tax and GST outcomes; and • Regulators and revenue authorities: changes in the approach to navigating FIRB in past 12 months, and non-resident CGT withholding requirements.	**Session 9B: AI Agents, Innovation Evidence and Transformation – Claiming the R&D Tax Incentive in Financial Services** **Speaker: Dean Cardillo, Deloitte** Australia's R&D Tax Incentive (RDTI) is a critical source of support for companies investing in innovative products, platforms and technology. With substantive record-keeping requirements and significant new changes, navigating R&D is challenging. This session will outline how banks, insurers, superannuation funds, start-ups, fintechs and platform providers can get their RDTI claims right, examining common pitfalls and the impacts of the proposed reforms coming into effect from 1 July 2028. This includes best practices for identifying opportunities within large-scale transformation programs, embedding RDTI considerations as part of the innovation project lifecycle, identifying the high-value innovation evidence that can support claims, and applying key learnings from DISR and ATO compliance activity. In addition, the session will explore how AI agents can help identify gaps in technical documentation held to support claims and supplement financial record-keeping by evidencing the link between the specific activities performed and costs incurred. Attendees will leave with a practical view of where the RDTI can support their plans for large-scale investment in innovation, how the proposed reforms may impact outcomes, and how they can utilise the latest technology to enhance and uplift their evidentiary support.
12:00–1:00pm	**Lunch**	

Technical program

Day 2 Friday, 12 March 2027 continued

Time	Session
1:00 – 2:00pm	**Session 10: Roundtable Discussion on Current and Emerging Issues** **Banking Update** Facilitator: Simon Jenner, CTA, EY The banking sector continues to face a range of tax issues driven by changes to funding, financing, capital management, regulation and the broader economic environment. This roundtable discussion will provide a practical examination of the current tax issues affecting banks and other lending institutions. It will explore developments affecting the balance sheet, financing arrangements, interest and deductions, bad debts, capital and emerging lending models, while considering the interaction between tax, accounting, prudential requirements and commercial decision-making. **Insurance Update** Facilitator: Ali Bolbol, CTA, BDO Tax outcomes in the insurance sector are shaped by the interaction between risk, actuarial estimates, accounting treatment and prudential regulation. This roundtable discussion will explore key tax considerations across general, life and health insurers, including recent and emerging developments. It will consider alternative risk financing and risk transfer models such as mutuals, discretionary mutual funds, captives and reinsurance, together with associated income tax issues including mutuality, offshore insurance and reinsurance, Division 15 and transfer pricing. A practical case study will illustrate how different approaches to risk funding can produce different tax outcomes. **Wealth Management Update** Facilitator: Jillian Gardner, HRL Morrison The wealth management sector continues to evolve as investment managers, platforms and advisers respond to changing investor expectations, product innovation, regulation and market conditions. This roundtable discussion will provide a practical examination of the current tax issues affecting wealth management businesses and their clients. It will explore developments affecting managed funds and investment platforms, product and fund structures, distributions and capital gains, fees and GST, and emerging asset classes and investment models. The discussion will also consider the interaction between tax, accounting, regulation, operational systems and commercial decision-making across the wealth management value chain.
2:00 – 2:30pm	**Afternoon tea**

Technical program

Day 2 Friday, 12 March 2027 continued

Time	Session
2:30 – 3:30pm	**Session 11: Cases and Rulings – What Do They Actually Mean for Financial Services?** **Speaker: Joanna Black, Alvarez & Marsal** Each year brings a new range of tax cases, rulings and administrative developments, but identifying the practical significance for financial services organisations can be challenging. This session will provide a focused review of the most significant cases and rulings from the year, with particular emphasis on their relevance to financial services. Rather than simply summarising the developments, The speaker will consider what the decisions mean in practice, how they may affect existing arrangements and what tax professionals should be considering in response.
3:30 – 4:30pm	**Session 12: ATO Current Areas of Focus in Financial Services** **Speakers: Antony Faisandier, Australian Taxation Office; Bill Neskovski, Australian Taxation Office; Anna-Maria Stephens, CTA, Australian Taxation Office** What are the key tax issues and developments impacting the financial services sector? This session will explore current ATO focus areas and emerging tax issues relevant to financial services taxpayers. Through practical insights and worked examples, the discussion will consider topical issues impacting the sector. The session will highlight key considerations for tax professionals and advisers, including how relevant developments may apply in practice.
4:30pm	**Conference Close**



Presenters

Joanna Black is a Managing Director with A&M Tax in Melbourne. Jo specialises in Australian income tax, and has advised many of the largest ASX listed companies on complex tax issues including mergers and acquisitions, capital raisings, capital management transactions and corporate restructures. Jo has extensive experience advising ASX listed and privately held companies, international groups and financial services clients on transaction structuring, the tax aspects of transaction documents (including public documents) and has a particular expertise in ATO early engagement and seeking class rulings and private rulings on listed and private transactions. Prior to joining A&M, Jo spent most of her tax career at Greenwoods & Herbert Smith Freehills, and PwC following its acquisition of Greenwoods & Herbert Smith Freehills. Jo completed her legal training at Freehills and is a practising lawyer in the Supreme Court of Victoria and the High Court of Australia and holds a Bachelor and Master of Laws from the University of Melbourne. Jo regularly presents at industry events run by the Tax Institute and the Corporate Tax Association, and has been involved in many submissions and public consultation processes on tax reform with the Australian Treasury, the Board of Taxation and the ATO.

Cameron Blackwood, ATI, is the Head of Tax at Corrs and is a leading transactional tax expert, specialising in mergers, acquisitions, and restructures. Having advised several of Australia's largest taxpayers, Cameron's expertise includes cross-border issues and all aspects of employee share schemes. He has significant experience acting for public and private companies on capital management, including capital raising, return of capital, special dividends and buy-backs and debt raisings. He regularly presents at The Tax Institute and the Corporate Tax Association on M&A, management incentive plans and international tax issues and demergers. Cameron has been recognised as a leading lawyer by legal directories and publications including Chambers, The Legal 500 Asia Pacific and Best Lawyers for Tax in Australia.

Ali Bolbol, CTA, is a Tax Partner in BDO Sydney's Financial Services Group with more than 23 years of experience providing tax advisory and compliance services to the financial services sector. He advises clients on mergers and acquisitions, divestments, corporate restructures, cross-border transactions, tax governance, and risk management. Ali has extensive experience supporting organisations through ATO reviews and audits and works with a broad range of financial services entities, including insurers, banks, lenders, funds management businesses, and payment providers. Prior to joining BDO, he worked at a Big Four firm. Ali is a regular presenter on industry tax issues and is also an author of the Australian chapter of the online IBFD Tax Research Platform: Mergers and Acquisitions.

Jodie Bosler has 35+ years' experience in roles at professional services firms, fund managers and custodians/fund administrators. These roles have enabled her to inform an extensive range of products, services, platforms and operating models – and associated risk management frameworks – from a design, implementation and change management perspective. Jodie has led in-house tax functions, and engaged as lead tax SME for product launches, regulatory change, transformation and remediation projects. She has contributed to various industry groups throughout her career including ACSA and FSC.

Dean Cardillo, PhD, is in Deloitte's Global Investment and Innovation Incentives (Gi^3) practice and is the leader in the Melbourne market. He has spent the last eight years focusing on assisting clients in the technology and financial services industries with lowering the cost of their innovation programs, primarily through the R&D Tax Incentive program. As a PhD-qualified researcher who has spent time in industry, Dean has a deep understanding of R&D project lifecycles and works with clients ranging from high-growth start-ups to large ASX-listed and multinational companies, designing and implementing robust processes that reduce the burden on business stakeholders while uplifting documentation and record-keeping practices to best support R&D Tax Incentive claims.

Siew-Kee Chen, CTA, is a Partner at Deloitte. He is the Deloitte Asia Pacific Regional Tax & Legal Leader for Investment Management. Siew-Kee is recognised as a leading tax adviser in investment management. He has over 27 years' experience providing tax advisory services to financial services, real estate, private equity and superannuation clients, and advising throughout the entire deal lifecycle, including mergers and acquisitions, due diligence, tax compliance and divestments. Siew-Kee delivers practical and commercial expertise to clients, drawing from his previous role as the Head of Tax of an Australian listed group. Siew-Kee has been heavily involved in the tax reform design for management investment trusts, CCIVs and financial services.

Presenters

Liam Collins, CTA, is a Partner at PwC Australia in the Financial Services Tax team. He advises some of Australia's largest listed groups, institutional investors and investment managers on international tax, mergers and acquisitions, and tax strategy. Liam has extensive experience leading multi-country teams on complex cross-border transactions and serving as a Global Lead Tax Partner for major clients. Having completed a three-year partner secondment to PwC Singapore, where he led the Global Structuring team, he brings a global perspective and expertise in international tax and financial services.

Antony Faisandier is an Assistant Commissioner (a/g) at the ATO. He is part of the ATO's Tax Counsel Network. Antony has a particular focus on the financial services and investment sectors, including capital management, and transaction review. Prior to joining the ATO, Antony worked in private practice at law firms and Big 4 accounting firms for 10 years, advising Australian and multinational businesses on the income tax consequences of their transactional and structuring decisions.

Marino Felice is a Partner in PwC Australia's Corporate Value Advisory practice, with over 16 years of experience providing valuation and strategic advisory services across Australia, North America and Europe. He specialises in business and investment valuations for transactions, tax, financial reporting, portfolio valuations and commercial decision-making. Marino has extensive experience advising clients across the financial services sector, including banks, insurers, asset managers and institutional investors. His experience includes valuing financial services businesses, unlisted equity and debt investments, and advising management teams and boards on complex valuation matters. Marino is a Chartered Business Valuator (CBV), Chartered Accountant (CA ANZ) and Chartered Professional Accountant (CPA Ontario). He holds a Bachelor of Arts (Honours) in Business Administration from the University of Western Ontario.

Jillian Gardner is the Head of Tax for Morrison, a NZ-headquartered global investment manager. She has extensive experience with complex cross-border transactions and asset management with multi-jurisdictional stakeholders, primarily in the infrastructure sector. Before joining Morrison, Jillian held a senior role with Macquarie in its Macquarie Asset Management team and was a partner at PwC.

Hannah Hesse, FTI, is a Partner in KPMG's Deal Advisory Tax practice. She has over 20 years' tax experience in Sydney and London, across various professional services organisations. Hannah has extensive experience advising clients on complex divestments, acquisitions, restructures and financing transactions, for corporate and financial services clients.

Jessika Heynen-Brookes, CTA, is a Partner in KPMG's Financial Services tax practice in Sydney. She has over 15 years' experience advising a wide range of clients in the financial services sector on issues including investments and related tax compliance, ATO interactions and the tax aspects of asset management products. Jessika's experience includes a number of years' in-house experience at Australian financial institutions, including leading the investment tax function at a large superannuation fund.

Simon Jenner, CTA, is a Partner in the Financial Services Tax practice at EY, specialising in banking and capital markets. He has over 30 years' experience advising large corporates on a variety of tax issues, including capital management, capital raisings, transactions, tax consolidation, thin capitalisation and the hybrid mismatch rules. Simon has also advised extensively on the application of the taxation of financial arrangements rules.

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

Johnathan McMenamin is the Head of Economic Forecasts at Barrenjoey. He is responsible for researching and forecasting key economic indicators across the Australian and New Zealand economies. Johnathan designed and developed Barrenjoey's economic framework and forecasting capabilities. Prior to working at Barrenjoey he worked at EY, working in EY's Oceania Office of the Chief Economist and EY's Valuations Modelling and Economics Team, and at NSW Treasury working within the Economic and Revenue forecasting division of Treasury. Johnathan has extensive experience researching, analysing and forecasting the Australian, international and state economies and delivering high-quality

Presenters

research to fixed income and equity market participants, senior members and executives of government and business. He also makes appearances in various forms of news media including print, radio and video. He is passionate about promoting the economics profession, which he has done through positions as councillor in the Economics Society of Australia, mentorship of young economists/analysts and school students. He has a Masters of Financial Analysis and Bachelor of Economics, majoring in Economics and Finance from the University of New South Wales.

Rimma Miller, ATI, has 25 years' experience in resolving taxation disputes, both at early stages of audit and reviews all the way through to litigation. She is an experienced adviser and tax litigator. Rimma conducts tax and tax-related litigation, both at federal and state levels. She also has experience in conducting judicial review, administrative law matters, constitutional law matters, debt litigation and insolvency matters.

Bill Neskovski is an Assistant Commissioner in Public Groups at the ATO and is responsible for leading the ATO's Banking and Finance, and GST Financial Services and Insurance strategies. He also leads a number of Engagement and Assurance teams in Sydney, which are responsible for the delivery of a large portfolio of compliance engagements across the Top 100, Top 1000 and medium and emerging markets. Bill has over 20 years' experience in leading complex audits and compliance engagements and also has responsibility for the ATO's transfer pricing Inbound Supply Chain strategy.

Matt Osmond, CTA, is a Partner in the financial services corporate tax team at PwC focused on banking and financial services. He is a lawyer, chartered accountant and registered tax agent. Matt brings global and Australian insights in financial services and taxation to his corporate and international clients. He has over 27 years' experience working with banks and financial services businesses in Australia and the UK and advises on a range of matters, including taxation of derivatives, financial arrangements, dividend management and franking, funding, profit repatriation, branch taxation, tax effect accounting, asset administration, securitisation, hedging, foreign exchange transactions, leasing, commercial and consumer finance products, offshore banking units, M&A and employee share schemes.

Anna-Maria Stephens, CTA, is an Assistant Commissioner at the ATO. She is part of the ATO's Tax Counsel Network, which plays a key role in the ATO's most significant and complex tax matters. Anna-Maria has a particular focus on the financial services and investment sectors, including managed investment trusts. Prior to joining the ATO, she worked in private legal practice for over 10 years, advising Australian and international corporates, financial institutions and fund managers.

Chris Tang is GST Partner at KPMG. He advises on GST issues across various sectors with a focus on government, property, financial services, and mining and energy. His experience extends to advising on the GST aspects of complex property transactions, development arrangements, financing structures, and mergers and acquisitions transactions. He also assists clients with ATO reviews/ audits and compliance matters.



Venue and accommodation







Crown Sydney

1 Barangaroo Ave, Barangaroo, NSW 2000

Crown Sydney offers uncompromising design that captures the essence of its harbourside setting, highly intuitive personalised service, and the finest dining and facilities unlike anything Sydney has seen before. It is located in the bustling precinct of Barangaroo, connected to sprawling parklands, laneway bars, beautiful public artworks and bay views of Sydney, redefining bespoke luxury in the heart of the harbour.

Getting there

Crown Sydney is ideally located along the Barangaroo waterfront, just moments from Sydney's CBD and approximately 15 kilometres from Sydney Airport. The venue is easily accessible by public transport, with Barangaroo Metro Station approximately a 6-minute walk away and Wynyard Train Station a 9-minute walk away.

The nearest light rail stop is Bridge Street, serviced by the L2 and L3 lines, an 11-minute walk from the venue. Barangaroo South bus stop on Hickson Road is just a 3-minute walk away, while Barangaroo Ferry Wharf is approximately 5 minutes away.

Parking

Valet parking for hotel guests is $100 per day. Casual parking is $160 per day, subject to availability. Alternatively, the Barangaroo Reserve Car Park is a 10-minute walk to Crown Sydney. We invite you to visit the website to view the most current rates and book in advance https://www.carepark.com.au/find-a-care-park/. For more information, you can also visit https://www.crownsydney.com.au/plan-your-visit/getting-here.

Accommodation

Favourable room rates have been negotiated and secured at Crown Sydney. Accommodation bookings can be made by clicking here. *This offer is not combinable with other offers.*

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 12 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

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

Delegate list

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

Dress code

Business or business casual attire is suitable for the duration of the conference.

Special dietary and accessibility requirements

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

Welcome reception

A Welcome Reception will be held directly following the last session on Thursday, 11 March from 5:00pm. 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 National 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/ conference lunches	Conference welcome reception*
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 Friday, 12 February 2027 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



The Tax Institute

Financial Services Taxation Conference
Registration form

45303 | WD

A tax invoice and confirmation email will be sent on receipt of your registration. Please photocopy for additional delegates and retain the 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*	Non-member
Early bird registration Register on or before 12 February 2027	☐ $1,895	☐ Event Member Rate plus pro rata* Affiliate membership until 30 June 2027. (*Approx $53 per month)	☐ $2,195
Standard registration Register after 12 February 2027	☐ $2,095		☐ $2,395

☐ 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 conference.

Thursday, 11 March 2027 at Crown Sydney.

☐ Yes, I WILL be attending the Welcome Reception OR

☐ No, I WILL NOT be attending the Welcome Reception

☐ Yes, I require additional tickets for the Welcome Reception at $80 per person

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

Dietary requirements:

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 until 30 June along with your event registration and:

- Save $300 off your event registration
- Access other member-only discounts in the future
- 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 Breakout session options

Please tick the breakout sessions you would like to attend during the conference:

Thursday, 11 March 2027

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

Friday, 12 March 2027

11:00am–12:00pm	☐ Session 9A	☐ Session 9B
1:00–2:00pm	☐ Roundtable Discussion: Banking Update	
	☐ Roundtable Discussion: Insurance Update	
	☐ Roundtable Discussion: Wealth Management Update	

4 Payment summary

Registration fees	$
Additional guest tickets – Welcome Reception ($80 each)	$
Total payable	$

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: 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.

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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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