

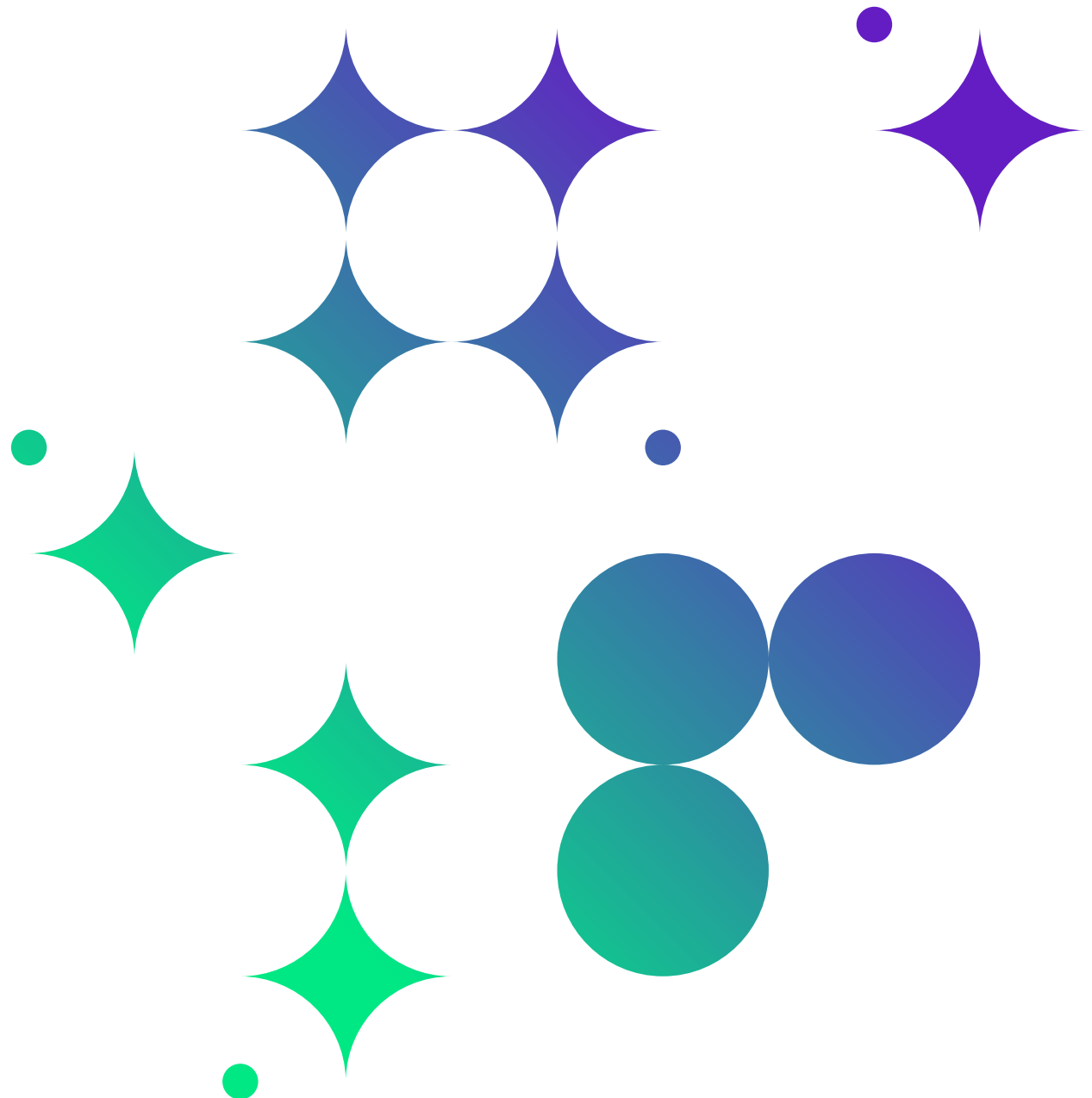
Shine together

Event Brochure

19–21 October 2022

ICC Sydney

20 CPD Hours



Welcome



The Tax
Summit

Shine Together

The Tax Summit

Shine Together

Immersive collaboration. Shared triumphs. Irresistible joy. Nothing beats the passion and knowledge of a dedicated tax professional.

Join us at the must-attend tax event of the year, The Tax Summit, to be held from 19–21 October in Sydney, as we look ahead to a bright future shared – and shaped – together.

The brightest minds in tax

This 3-day experience is a unique opportunity to connect in-person with fellow practitioners and explore perspectives from around the world of tax. Hear first-hand from an unrivalled array of speakers discussing tax from every aspect. We will investigate developments, impacts, and ideas with clear eyes and forward thinking.

Stellar technical program

Tailor your experience during the event to get the insights, tools, and tips you need, right now. With sessions on corporate, professional practice, property, technology, SME, and domestic and international issues, the program embraces the wide and varied experiences, and the constantly shifting environment of tax professionals. Don't miss this once-a-year opportunity to engage, reflect, challenge, and learn.

See you at the Summit

Now that we can celebrate the return of in person events, it's time to get social. Reacquaint yourself with old colleagues and make plans to meet some new ones too! We have some superb networking opportunities planned for our attendees. Cruise the world's most beautiful natural harbour and take in all the famous sights as part of the Welcome Reception. Plus, there is the must-attend Gala Dinner and Tax Adviser of the Year Awards, an opportunity to honour the stars of the profession. Both included in your individual registration fee.

Stay and play in Sydney

Take the time to add a few days pre or post event in the Emerald City to unwind. It's changed over the last couple of years, just like we all have. We invite you to visit and explore both the old and new of the city and its surrounds. You deserve it and couldn't be better placed.

Event Chairs



Jerome Tse, CTA

King & Wood Mallesons
President, The Tax Institute
Organising Committee Chair



Marg Marshall, CTA

WLF Accounting & Advisory
Vice President, The Tax Institute
Program Committee Co-Chair



Sandra Farhat, FTI

EY
Program Committee Co-Chair

Silver Sponsor:



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Be part of the excitement and the camaraderie of the profession as we shine together at The Tax Summit.

For those who want to be inspired by the brightest minds in tax.

Who should attend?

Taxation specialists across all sectors
(public, private, NFP)

Accountants working for or advising SMEs or corporates

Newcomers to the profession
who are wanting to learn and grow their networks

Business leaders, owners, directors and consultants with an interest in tax

Anyone with an interest in the latest issues impacting businesses locally and globally

Why attend?

Learn up to 20 CPD hours on offer

Discover hear from the latest thought leaders in tax

Honour recognise your peers at the
Tax Adviser of the Year Awards

Network three dedicated functions form part of the Summit

Relax take a break and enjoy a pre or post-Summit tour
in beautiful Sydney

Highlights



Connect

Network with likeminded individuals and speakers

Ignite

Hear and learn from the latest thought leaders in tax

Shine

Acknowledge peers with the Tax Adviser of the Year awards

Unite

Be part of Australia's tax community

Venue

The International
Convention Centre,
Sydney

Australia's first fully-
integrated harbourside,
exhibition and
entertainment venue.



Situated in Sydney's academic, cultural and technology precincts, ICC Sydney offers convenient access to Australia's most cosmopolitan city. A major financial hub in the Asia Pacific region, it's home to 43 local and foreign-owned banks, over 600 multinational firms, and Australia's largest Professional Services, FinTech and Technology industries.

3

floors of
conference
space

5

minutes
from the
CBD

6

star Green
building
rating

Keynote speakers

Leigh Sales, AM

Award winning author
and journalist



The Hon Michael Kirby, AC CMG

Jurist, Educator and
former Justice of the
High Court of Australia



Geoffrey Lehmann

Renowned Tax Lawyer
and Australian poet

Chris Jordan, AO, CTA

Commissioner of Taxation
and Registrar of the
Australian Business
Registry Services



Karen Payne, CTA

Inspector-General of
Taxation and Taxation
Ombudsman

Bruce Billson

Small Business and Family
Enterprise Ombudsman



The Hon Allegra Spender, MP

Member for Wentworth

Jo Masters
Economist, Barrenjoey



Scott Treatt, CTA
General Manager,
Tax Policy & Advocacy,
The Tax Institute



Dominic Price
Team Doctor and
Work Futurist, Atlassian

Julie Abdalla, FTI
Tax Counsel,
The Tax Institute



Robyn Jacobson, CTA
Senior Advocate,
The Tax Institute

Program

Day 1 • Wed, 19 Oct 2022

◆ 8:00-8:30am	Registration				
8:30-9:00am	Session 1: President's Address and Official Welcome, Jerome Tse, CTA, President, The Tax Institute				
9:00-10:00am	Session 2: Justice Hill Memorial Lecture, 'Remembering Graham Hill', The Hon Michael Kirby AC CMG and Geoffrey Lehmann				
◆ 10:00-10:30am	Morning Tea				
	SME ●●	Corporate ●	Hot Topics ✨	Professional Practice ●●●	Emerging Leaders ● ✨
10:30-11:30am	Session 3.1 Section 100A and Division 7A – The need for certainty	Session 3.2 Tax and ESG – How tax is being used as a lever	Session 3.3 Moving on from COVID-19 – where are we now?	Session 3.4 Structuring for flexible profit sharing	Session 3.5 The Do's and Don'ts of Division 7A
11:30-12:30pm	Session 4.1 Section 100A and Division 7A – Are you in the right zone?	Session 4.2 Putting the 'Tax' in ESG: Corporate Governance and Tax	Session 4.3 Employee Share Plans – Latest developments	Session 4.4 Partnership Tips and Traps	Session 4.5 Individual Residency
◆ 12:30-1:30pm	Lunch				
1:30-2:30pm	Session 5.1 Restructures, Demergers and Buybacks	Session 5.2 20 years of Tax Consolidation	Session 5.3 Legal Professional Privilege	Session 5.4 Professional Practice Structures	Session 5.5 Recent Trends – Capital versus Revenue
2:30-3:00pm	Afternoon Tea				
3:00-4:00pm	Session 6.1 Tax Consolidations for SMEs	Session 6.2 Recent Trends –Part IVA	Session 6.3 Community Benefit and Philanthropic Giving – A client journey	Session 6.4 Client Certificates and Support letters – are they worth the risk?	Session 6.5 Revisiting Goodwill
4:00-5:30pm	Session 7: Q&A Panel – Creating the catalyst for change, Jo Masters, Barrenjoey, Bruce Billson, Small Business and Family Enterprise Ombudsman, The Hon Allegra Spender, MP, Scott Treatt, CTA, The Tax Institute, Facilitator: Leigh Sales, Journalist and Author				
◆ 5:30-7:30pm	Welcome Reception, Sydney Harbour cruise on board <i>The Jackson</i>				
7:30pm	Delegate Social Options				

Day 2 • Thu, 20 Oct 2022

8:30am-9:15am	Session 8: Tax Policy and Advocacy Panel, Scott Treatt, CTA, The Tax Institute, Robyn Jacobson, CTA, The Tax Institute, Julie Abdalla, FTI, The Tax Institute				
9:15-10:00am	Session 9: Commissioner's Address: Chris Jordan, AO, CTA, Commissioner of Taxation and Registrar of the Australian Business Registry Services				
◆ 10:00-10:30am	Morning Tea				
	SME ●●	Corporate ●	Hot Topics ✨	International ●●	Professional Obligations ●●
10:30-11:30am	Session 10.1 The elephant in the room – ageing population and ageing structures	Session 10.2 Corporate Tax Residency	Session 10.3 Property flipping as a national sport – are the flippers amateurs or professionals?	Session 10.4 BEPS Pillar 1 and 2	Session 10.5 Data Security and Professional Obligations in a Digital World
11:30am-12:30pm	Session 11.1 Small Business CGT Concessions – Are you in or are you out?	Session 11.2 Future of Justified Trust	Session 11.3 Property development agreements in broad acre setting	Session 11.4 BEPS Pillar 2 – Practicalities and Realities	Session 11.5 Meeting Professional Standards in your Practice
12:30-2:00pm	Session 12: Inspector-General of Taxation and Taxation Ombudsman Address, Karen Payne, CTA, Inspector-General of Taxation and Taxation Ombudsman (<i>Session followed by lunch</i>)				
	Tax Disputes ●●				
2:00-3:00pm	Session 13.1 Assembling the Evidence	Session 13.2 The <i>Clough</i> decision and impacts on M&A	Session 13.3 GST	Session 13.4 Intangibles	Session 13.5 In-house perspectives – Dealing with ATO Reviews and Audits
◆ 3:00-3:30pm	Afternoon Tea				
3:30-4:30pm	Session 14.1 Outlays on refurbishments – A repair or an improvement?	Session 14.2 Heads of Tax Panel	Session 14.3 Insolvency	Session 14.4 Diverted Profits Tax and Multinational Tax Avoidance Law	Session 14.5 Tax Disputes and Evidence
4:30-5:30pm	Session 15.1 Outlays on refurbishments – Practical scenarios	Session 15.2 Getting TP Right – Why does it go wrong and how to avoid the common mistakes	Session 15.3 R&D Tax Incentive – What you need to know	Session 15.4 International developments – What's happening overseas?	Session 15.5 ADR and Early engagement
5:30pm	Delegate Free Time				
◆ 7:00pm	The Tax Summit Gala Dinner including the Tax Adviser of the Year Awards				

Day 3 • Fri, 21 Oct 2022

8:30-9:30am	Session 16: VIP Presentation				
	SME ●●	Corporate ●	Hot Topics ✨	Going Global ✨	Digital ●●●
9:30-10:30am	Session 17.1 Current tax issues – Planning and administering Testamentary Trusts	Session 17.2 Capital Management and M&A – What's new?	Session 17.3 Case Update – Recent cases and rulings	Session 17.4 So my client wants to go offshore – now what?	Session 17.5 Digital assets
◆ 10:30-11:00am	Morning Tea				
11:00-12:00pm	Session 18.1 SMSF Structuring	Session 18.2 Practical ways to obtain tax certainty	Session 18.3 Innovative Investment Entity Concessions and arrangements	Session 18.4 Cross border interactions in the SME space	Session 18.5 Transforming your Tax Function – the key to tax technology
12:00-1:00pm	Session 19.1 SMSF Investment Strategies	Session 19.2 Economic Update	Session 19.3 Employee versus Contractor	Session 19.4 Foreign companies doing business in Australia	Session 19.5 Data – How to use it and how it's being used
1:00-2:30pm	Session 20: Closing Keynote – Seated Lunch, Dominic Price, Atlassian				

Session Outlines

Keynotes

Session 1: President's Address and Official Welcome

Speaker: Jerome Tse, CTA, President, The Tax Institute

Session 2: Justice Hill Memorial Lecture – 'Remembering Graham Hill'

Speakers: The Hon Michael Kirby AC CMG and Geoffrey Lehmann

Michael Kirby's judicial reasons were sometimes in dissent. But they were always readable and questioning of past authority in the tax area. He acquired a reputation which he suspects is undeserved, of great expertise in the tax area. He bows in this respect to his school, university and professional friend and colleague, the late Justice Graham Hill. He will speak on memories of Graham Hill and tax law. Joining Michael in the session will be renowned tax lawyer and Australian poet, Geoffrey Lehmann who will ponder "Why do we tax, and what?". Together they will discuss Justice Hill's judicial work in tax cases and other issues relevant to today's tax practitioner.

Session 7: Q&A Panel – Creating a catalyst for change

Panel: Jo Masters, Barrenjoey, Bruce Billson, Small Business and Family Enterprise Ombudsman, The Hon Allegra Spender, MP, Scott Treatt, CTA, The Tax Institute

Facilitator: Leigh Sales, Journalist and Author

The way in which we live, and work has shifted significantly over the past two and a half years and is likely to have an everlasting impact. The economic environment has also shifted, we are now experiencing higher inflation, mixed and delayed growth in wages,

high levels of personal, small business and government debt, and increasing interest rates. This interactive Q&A session will explore the role of technology in business both now and in the future, what business can expect from a new Government operating within these settings, and the role our tax system can play. We will address issues including tax reform, the current economy, and the forecast for the next 12 months. We will also reflect on how we can innovate to support our staff, our businesses, and our clients to operate in a 'new normal'.

Session 8: Tax Policy and Advocacy Panel

Panel: Scott Treatt, CTA, The Tax Institute, Andrew Mills, CTA (Life), The Tax Institute, Robyn Jacobson, CTA, The Tax Institute, Julie Abdalla, FTI, The Tax Institute

Join The Tax Institute's in-house tax experts from the Tax Policy and Advocacy team as they discuss and debate a number of key issues facing the tax system and the tax community. The team will discuss some of the challenges with these issues, what practitioners can do in their day-to-day interactions with the tax system and with their clients, and what actions The Tax Institute is taking on these matters.

Session 9: Commissioner's Address

Speaker: Chris Jordan, AO, CTA, Commissioner of Taxation and Registrar of the Australian Business Registry Services

In his annual address, Commissioner Chris Jordan AO will reflect on the last 12 months, the ATO's progress toward its 2024 vision, its current agenda and the future of tax administration.

Session 12: Inspector-General of Taxation and Taxation Ombudsman Address

Speaker: Karen Payne, CTA, Inspector-General of Taxation and Taxation Ombudsman

The Inspector-General and Taxation Ombudsman investigates and reports on the administration of the taxation law, both in relation to taxpayers, and more broadly, in relation to the systems established by the Australian Taxation Office or the Tax Practitioners Board.

In an age where the ATO and TPB have their own wide-reaching statutory powers, the function performed by the IGTO's office provides a vital means of ensuring that taxation laws are applied in a way that is consistent with that of community expectations. In this session, we will hear from the IGTO on the functions, powers, and duties of her office, as well as some key examples of ongoing and completed investigations.

Session 16: VIP Presentation

Hear first-hand from a key and influential decision maker. A session not to be missed!

Session 20: Closing Keynote – Seated Lunch

Speaker: Dominic Price, Atlassian

After three days of in-depth tax technical content as well as some fun and festivities, it's time to relax, sit back and enjoy a seated lunch and some inspiring thoughts from our visionary presenter.



SME

Session 3.1: Section 100A and Division 7A – The need for certainty

Speakers: Fiona Dillon, ATO, Vanessa Priest, FTI, Baskin Clarke Priest

Facilitator: Robyn Jacobson, CTA, The Tax Institute

Section 100A was drafted back in 1979 to combat certain tax avoidance arrangements.

Join our panel discussion with Fiona Dillon of the ATO and members of The Tax Institute's consultation submission team to discuss the ATO's TR 2022/D1, TD 2022/11, PCG 2022/D1 and TA 2022/1 including:

- ATO interpretation of Section 100A and Division 7A
- Tips for navigating the uncertainty
- Defending 100A assertions
- Financial Accommodation and Ordinary Family Dealings
- Arrangements safe from ATO compliance action
- Retrospective application from 2014, and
- Promoter Penalties – the sting in the tail.

Session 4.1: Section 100A and Division 7A – Are you in the right zone?

Speakers: Neil Brydges, CTA, Sladen Legal, Robyn Jacobson, CTA, The Tax Institute

Following on from the previous panel session, how do we navigate these changes in today's world?

This session will consider some practical solutions to assist with the ATO's Red/Blue/Green/White Risk Zones and how to address the 'mischief' including:

- Current application of TA 2022/1 (now final not Draft)
- Retrospectivity – what (if anything) can we do about the past?
- Steps to take going forward
- The importance of financial statements and year end resolutions
- UPEs versus Loan Agreements with family members
- Capital gains versus income
- Whether Family Charters help, and
- Outstanding issues still to be addressed by the ATO.

Session 5.1: Restructures, Demergers and Buybacks

Speakers: Danielle Constantine, CTA, William Buck, Todd Want, CTA, William Buck

When it comes to restructuring an SME business, there are the obvious choices of the SBRR or perhaps accessing the small business concessions. However, when your business is too big to be small, you need to look to other restructure tools usually considered the realm of the 'big end of town'.

This session considers capital management strategies available to small businesses, and asks whether demergers are really out of reach for SMEs.

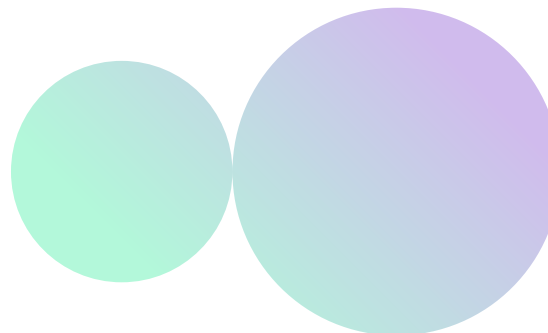
Session 6.1: Tax Consolidations for SMEs

Speakers: Elizabeth Allen, Macpherson Kelly, Dominic Moon, ATI, Macpherson Kelly

A changing tax landscape requires new responses to old problems. Consolidation continues to grow in popularity for many SME groups looking to alleviate structural pressures on compliance, particularly where trusts and Division 7A are involved.

This session is based on practical worked examples and will cover:

- Why consolidate in an SME context and who can do it?
- Lifecycle of a consolidated group including formation and bringing in or exiting subsidiaries, and
- Particular consolidation issues (and solutions) for internal restructures and trusts.





SME continued

Session 10.1: The elephant in the room – ageing population and ageing structures

Speaker: Ron Jorgensen, CTA, Thomson Geer

The worst enemy of existing structures is time. Structuring advice is always based on the rules in place at the time the advice is provided, with consideration of current and future goals. However, as time passes things can get a little hairy. This session considers:

- Trust distributions, UPEs and Division 7A – issues with dealing with or unwinding old UPEs and loans, for example as ‘controllers’ or as part of deceased estate issues (either within or outside of the estate)
- Changing the guard (an issue for an ageing population), and
- Navigating the pointy end of the season – tax, funding, estates (holistic ongoing legacy issues), plus more.

Session 11.1: Small Business CGT Concessions – Are you in or are you out?

Speaker: Linda Tapiolas, CTA, Cooper Grace Ward

The small business CGT concessions have generous tax outcomes but qualifying for them is ‘all or nothing’. This session will focus on situations where the asset being disposed of are shares in a company, and will examine:

- Additional necessary conditions
- CGT concession stakeholders and tracing interests in trusts and companies
- Passing the 90% test with subsequent trust distributions – what can and cannot be done

- ‘Income’ in the context of participation percentages in trusts – trust law versus net income and income versus capital distributions, and
- The active asset test as it relates to shares in a company.

Session 13.1: Assembling the Evidence

Speaker: Paul Hockridge, CTA, Hockridge Advisory

Establishing and documenting consideration on an arms’ length basis is a key evidentiary requirement when related parties transact, but fee pressure can lead to short cuts in establishing and documenting the process.

These short cuts can expose the client to an ATO review and may ultimately demonstrate practitioner negligence.

This session examines the likely cost of short cuts in this area, and covers aspects of revenue legislation that are touched on in establishing arm’s length consideration (including NALI/NALE, PSI, debt/equity rules, market value substitution rules, and others).

Session 14.1: Outlays on refurbishments – A repair or an improvement?

Speaker: Melinda Peters, CTA, McCullough Robertson

This session explores the repair/improvement dichotomy raised by outlays incurred to refurbish buildings. In 2021, fires, floods, earthquakes, cyclones and third party mandates compelled significant outlays on building refurbishment.

Governments, LGAs, Fire Authorities, insurance companies and Owners Corporations can all mandate refurbishment outlays such as:

- installing a sprinkler system
- removing and replacing flammable cladding or
- replacing a balcony

The task of characterising the refurbishment outlays (and potentially insurance recoupments) is complex and brings into focus many facets of tax law including balancing adjustments, CGT events, rollovers, and insurance proceeds.



SME continued

Session 15.1: Outlays on refurbishments – Practical scenarios

Speaker: Linda Farmer, CTA, LF Tax

Following on from the previous session, this will be an interactive discussion using case studies including scenarios that address:

- Refurbishing buildings damaged by fires, floods, vehicle impacts and even earthquakes
- Raising or jacking up buildings in flood areas
- Outlays on complying with heritage protection requirements
- Mandated improvements for tenant
- Problematic foundations and collapsing balconies in high rise buildings
- Whether refurbishment creates new residential premises, and
- The operation of sections 118-147 and 118-155, and the occupancy rule.

Session 17.1: Current tax issues – Planning and administering Testamentary Trusts

Speaker: Matthew McKee, CTA, Brown Wright Stein

Even if the Section 100A controversy has largely passed by testamentary trusts with minor beneficiaries, there remain a myriad of issues taxpayers need to consider when making distributions to minor beneficiaries. This session will consider some of the key taxation traps for testamentary trusts including:

- Distributions to minor beneficiaries, unpaid present entitlements and parent, child or trustee expenses
- Practical challenges for accumulation of property in or borrowings by testamentary trusts in light of 2020 legislative amendments, and
- Issues associated with non-resident children and testamentary trusts for distributions (the section 99B consideration) and residency (considering use of Australian registered corporate trustees).

Session 18.1: SMSF Structuring

Speaker: Loreena Gillon, CTA, Arithmos Chartered Accountants

The use of SMSFs continues to grow in popularity and we are seeing a resurgence of requests for advice on how to appropriately advise trustees to interact with related parties. This session will cover:

- Related and unrelated unit trusts
- Tenants in common, and
- Joint ventures.

Session 19.1: SMSF Investment Strategies

Speaker: Jemma Sanderson, CTA, Cooper Partners

The sole purpose test and requirements of investment strategies for SMSFs is not new, but what are the legal versus practical requirements of a complying investment strategy?

In light of recent cases involving the sole purpose test, this session will consider:

- Requirements of a complying investment strategy
- Developing a tailored and specific SMSF investment strategy
- What should they cover and why?
- Who should be drafting the SMSF investment strategy?
- Relevant circumstances and SMSF transactions to be considered
- How can you assist your SMSF clients to meet these requirements?



Corporate

Session 3.2: Tax and ESG – How tax is being used as a lever

Speaker: Jayde Thompson, PwC

Sustainability and the impact of corporates on the environment has become both a fundamental and a political issue. The use of taxes and similar mechanisms to encourage behaviour and incentivise investment is a key part of policies to address this challenge.

This session will discuss this trend and the impact it has on organisations.

Session 4.2: Putting the ‘Tax’ in ESG – Corporate Governance and Tax

Speakers: Adam Coonan, EY Law, Jesper Solgaard, EY

Corporate governance and the ‘social licence’ have become a common theme with heightened expectations of boards to both exhibit and model expected behaviours. Corporates who do not embrace this changing landscape will find themselves left behind.

In this session we discuss how tax gets a seat at the table and the role of tax in the broader ESG movement.

Session 5.2: 20 years of Tax Consolidation

Speaker: James Macky, CTA, KPMG

This session will take you on a journey through the last 20 years of tax consolidation. It will provide an adviser’s perspective on what still needs to be fixed, what could be improved, practical implications and developments over the last 20 years.

Session 6.2: Recent Trends – Part IVA

Speaker: Fiona Knight, CTA, Australian Taxation Office

More than ever, SMEs and large corporates and their advisers must consider the risk that the Commissioner may apply Part IVA to an arrangement.

This session will explore the meaning of principal purpose, and practical considerations for taxpayers planning a restructure, making an acquisition or divestment.

What defences are relevant and available to taxpayers when faced with such a challenge, particularly when the ‘do nothing’ is no longer available? It will also consider what taxpayers should do when the ATO suspects some mischief is in play and how to best navigate the interaction.

Session 10.2: Corporate Tax Residency

Speaker: Chris Peadon, FTI, New Chambers

While we would like to think that corporate tax residency will be resolved imminently, the fact is that organisations have been required to navigate a complex and uncertain environment for several years.

The uncertainty posed by unenacted measures and the practical difficulties of ensuring compliance, has caused many organisations to consider how to best position themselves and avoid common pitfalls.

In this session we discuss the issues associated with corporate tax residency, the ideal solution and how organisations can plan to ensure they don’t find themselves in a difficult (and potentially irreversible) situation.

Session 11.2: Future of Justified Trust

Speaker: *To be announced*

Justified Trust and the approach to assurance has allowed the ATO to objectively assess that organisations are paying the right amount of tax and positively point to a reduction in the corporate tax gap. We will hear from one of the ATO’s most senior leaders about the theory behind it and the next phase of its approach.

Session 13.2: The *Clough* decision and impacts on M&A

Speakers: Fiona Beckett-Cooper, EY, Bernard Quain, EY

The *Clough* decision raises some novel considerations for M&A transactions in relation to the treatment of expenses and costs associated with such transactions. The ramifications are widespread and go beyond just employee incentives and cover many other relevant transactions including indemnity insurances and other employee expenses.

In this session we will hear about the *Clough* decision and the key considerations for practitioners in an M&A context.





Corporate continued

Session 14.2: Heads of Tax Panel

Speakers: Kenny Cheong, ATI, 7 Eleven, Catherine Feng, Origin Energy, Adrian Lovell, FTI, APA Group

Facilitator: David Earl, FTI, PwC

Hear the latest insights from leading Heads of Tax on relevant tax matters over the last 12 months, including:

- ATO engagement
- Tax technology
- Workforce constraints
- Development of tax technical matters and impacts on the tax function
- Tax governance, and
- Board reporting.

Session 15.2: Getting TP Right – Why does it go wrong and how to avoid the common mistakes

Speaker: Sophie Lewis, KPMG

Transfer pricing is one of the key issues, if not the key issue, affecting most corporates. The ATO has an ongoing focus on this area and organisations need to ensure they have established frameworks to get transfer pricing right and avoid the common pitfalls that lead to disputes with tax authorities.

This session will discuss some of the more common pitfalls in documenting arrangements and pricing related party transactions as well as options available to maximise certainty and ensure good governance.

Session 17.2: Capital Management and M&A – What's new?

Speakers: Joe Power, Allens, Jay Prasad, ATI, Allens

This session will explore some key tax issues associated with public and private M&A and capital management transactions, including:

- a brief look at the year that was – observations and anecdotes from the past year's cases and ATO rulings
- how recent demerger transactions have been affected by the ATO's now finalised views on 'restructuring', and
- franking a special dividend – some tips and traps.

Session 18.2: Practical ways to obtain tax certainty

Speaker: Keith Swan, KPMG

Tax risk management and obtaining certainty over key tax risks is a priority for many organisations. Understanding all the options available as well as weighing up the pros and cons of the multiple avenues of engagement can be a complex task.

In this session we will discuss the various avenues to obtain certainty in key tax risk areas and outline the levels of comfort available under each option. This will also include a discussion of case studies to assist in the illustration of certainty in practice.

Session 19.2: Economic Update

Speaker: Jeremy Thorpe, PwC

This session will provide an update on the domestic and international economic environment as we prepare for the Commonwealth Budget in the following week.



Hot Topics

Session 3.3: Moving on from COVID-19 – where are we now?

Speaker: Jackie Shelton, KPMG

There have been unprecedented changes in the ways business has been conducted over the last two years, along with rapid responses from the Federal Government and the ATO, some with temporary, and some with lasting implications.

This session considers the tax issues for businesses as they adapt and move forward, including:

- ATO guidance on prolonged employee displacement and business travel due to the pandemic, corporate and individual tax residence and permanent establishment considerations
- Considerations on how new ways of working may shape future tax legislation and guidance including ATO proposed revised corporate and individual tax residency definitions, whether the current definition of a commuter remains fit for purpose and whether the 'source of income' default position being where the work is physically performed still holds, and
- ATO compliance activity in this area.

Session 4.3: Employee Share Plans – Latest developments

Speakers: Andrew Clements, FTI, King & Wood Mallesons, Tim Sherman, CTA, King & Wood Mallesons

There have been several developments in the last 12 months in the rules relating to employee share plans.

This session will provide an overview of the updates and consider the practical implications of those developments for employers and employees, including:

- The removal of the deferred taxing point on cessation of employment
- Tax Determinations TD 2022/4 and TD 2022/8, and
- The new corporate disclosure rules.

Session 5.3: Legal Professional Privilege

Speaker: Faith Harako, Australian Taxation Office

The ATO has recently published its guidance to taxpayers and advisers making LPP claims in response to formal notices. The protocol supports the right of taxpayers to keep their communications confidential. At the same time, it provides a framework for taxpayers that allows the ATO to have confidence that relevant information and documents have been provided to the ATO in accordance with the formal notice.

This session will provide different perspectives and practical insights on the ongoing developments in relation to LPP.

It will include:

- an overview of the ATO's protocol
- ATO views and common concerns
- An adviser's perspective on how to manage LPP
- Practical guidance on how organisations can ensure they understand their entitlements appropriately, and
- A summary of how to prepare clearly documented governance approaches to comply with the relevant requirements.





Hot Topics continued

Session 6.3: Community Benefit and Philanthropic Giving – A client journey

Speakers: Morag Ingham, CTA, Grant Thornton, Rachel Vijayaraj, CTA, Brown Wright Stein

With many wealthy families and businesses wanting to 'give back' or contribute to the causes that are important to them, more than they have ever done before, advisers need to help clients understand the structural and taxation issues associated with their giving. In highlighting that it is much more than a choice between a one-off cash gift and establishing a PAF, this session will consider:

- The gifting continuum
- Accommodating non-DGR purposes, and
- Choices of philanthropic vehicle and when they are effective.

Session 10.3: Property flipping as a national sport – are the flippers amateurs or professionals?

Speakers: Corey Beat, CTA, Findex, Chris Wallis, CTA, Victorian Bar

In recent years, reality television, a booming property market and low interest rates have spawned thousands of property development arrangements and none are standard. This session will cover:

- Type of entities that can be involved (including single entities, property owners and 'builders' joining forces, and single venture unit trusts)
- How many flips make an enterprise?
- How many flips make a business?

- Can a flipper access the main residence exemption?
- Does using a single venture entity (eg a new unit trust) change the outcome?
- Can a developer reinvent themselves as an investor through choice of co-participants or entity?

Session 11.3: Property development agreements in broad acre setting

Speaker: *To be announced*

Broadacre land holdings on the periphery of larger cities (many held or accumulated by primary producers over long periods) provide most of the feed stock for broadacre land developments.

Current pressures to bring residential land onto the market coupled with long delays in planning approvals can leave developers holding development rights exposed.

Standard modern development agreements require land owners to make payments to developers for development costs incurred, which will generally include a component of 'profit'. In this session we consider:

- How should outlays and receipts be characterised?
- Does section 15-15 still have a role?
- Must land be characterised as trading stock?
- Allocating value and cost to a lot, and
- Potential duty on the developer's right to receive a share of the profits?

Session 13.3: GST

Speaker: Scott McGill, CTA, Pitcher Partners

This session will explore the hottest thing in GST right now, GST charged on property transactions and issues that arise when entering into these transactions. Some particular issues that will be considered are:

- When vendors need to register, considering whether the vendor is conducting an enterprise and whether the transaction is capital in nature
- Recent audit activity focusing on self-managed super funds that are disposing of property, including recent cases on this point, and
- Key issues with contracts on purchase and sale, why it is important and what can go wrong.

Session 14.3: Insolvency

Speaker: John Carrello, BRI Ferrier

This session will consider the current market conditions, an overview of the main forms of external administration, receivership and liquidation and current issues in relation to restructures, turnarounds, and insolvency along with some practical examples that tax practitioners should become familiar with.



Hot Topics continued

Session 15.3: R&D Tax Incentive – What you need to know

Speakers: Kathryn Bertram, FTI, Johnson Winter & Slattery, Mariana von Lucken, CTA, HLB Mann Judd

This session will explore the lifecycle of the R&D tax incentive, outline the key technical issues in making a claim and offer an understanding of the likely review process if AusIndustry make an adverse determination.

The session will cover:

- An overview of the current R&D tax incentive
- Pitfalls and Tips
- How the proposed changes will affect your client's business
- Key lessons from recent cases
- Timeline of an actual dispute from AusIndustry decision to the AAT review and what it may cost you
- Lessons learnt 'on the ground', and
- How taxpayers can avoid a dispute with AusIndustry.

Session 17.3: Case Update – Recent cases and rulings

Speaker: Keni Josifoski, New Chambers

This session will cover the following key income tax cases of the last 12 months including:

- *Singtel*
- *Shell, and*
- *Clough*

Session 18.3: Innovative Investment Entity Concessions and arrangements

Speaker: Bevan McLeod, BlueRock

The development of innovative businesses in Australia and avoiding the loss of talent to more attractive international opportunities is becoming a key issue for government and industry. Tax concessions provide incentives for taxpayers to invest in enterprises in their start up and early stages of development, and there has been an evolution in how businesses can source needed capital through crowd funding structures.

This session will consider those concessions and the related structures from the perspective of both the business and the private investor, and will address:

- Early-stage innovation companies (ESIC)
- Early-stage venture capital limited partnerships (ESVCLP)
- Venture capital limited partnerships (VCLP), and
- Crowd funding arrangements.

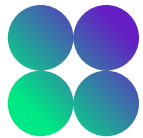
Session 19.3: Employee versus Contractor

Speakers: Steven Batrouney, CTA, Deloitte, Paul Tyler, Deloitte

Two recent High Court decisions and several payroll tax cases have thrown the spotlight on the employee/contractor conundrum.

This session will cover:

- The new approach for determining whether a person is an employee or an independent contractor following the recent High Court decisions of *ZG Operations Australia Pty Ltd v Jamsek* and *Construction, Forestry, Maritime, Mining and Energy Union v Personnel Contracting Pty Ltd*
- Recent payroll tax cases and a new NSW revenue ruling affecting payments received by medical practitioners from medical centres
- Navigating the different employee/contractor tests (common law, payroll tax and superannuation), and
- Practical implications.



Professional Practice

Stream Facilitator: Paul Banister, CTA, Grant Thornton

Session 3.4: Structuring for flexible profit sharing

Speaker: Greg Travers, CTA, William Buck

The complexities of today's business environment see people contribute, and look to get rewarded, in many ways. It is unusual for business profits to be shared strictly along equity lines, given the diverse contributions being made of capital, skills, qualifications and experience, innovation and time and effort – as well as managing exposure to commercial risks. This session will consider how professional practice entity structures can effectively be utilised to address these challenges, despite taxation guidelines.

Session 4.4: Partnership Tips and Traps

Speaker: John Ioannou, CTA, Macpherson Kelly

Despite partnerships being one of the oldest business structures, they continue to be misunderstood because of confusion between their status for tax purposes and their treatment for general purposes. This session will touch on the basics but explore some of the more interesting and practical issues you would expect to canvass in practice when dealing with general law partnerships, including:

- Partnership agreement basics
- Partnerships of trusts – use of nominee and/or common trustee
- Limited partnerships
- Partnerships of individuals and use of service trusts
- No goodwill partnerships, and
- Professional standards and regulations.

Session 5.4: Professional Practice Structures

Speaker: David Hughes, CTA, McCullough Robertson

There is good reason for PSI/PSBs to continue to be intertwined with professional practice structuring.

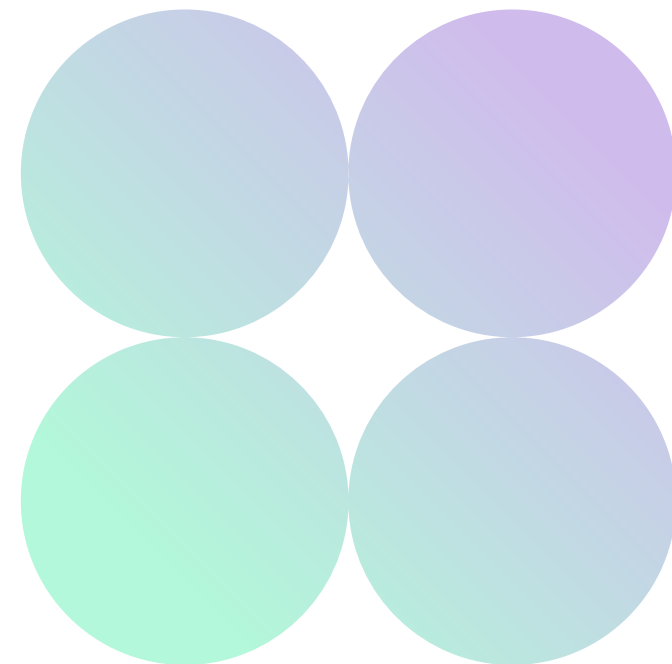
This session will walk through some tips and traps when dealing with PSI/PSBs as well as review some considerations when structuring professional practices that fall outside the PSI/PSB framework.

Session 6.4: Client Certificates and Support letters – are they worth the risk?

Speaker: Mark Tomsic, Grant Thornton

Accountants and lawyers strive to provide the best support they can to help clients achieve their goals while managing the significant risks associated with professional practice. However, some tasks involve more risks than others and need to be approached carefully. In considering how to approach completion of Sophisticated Investor Certificates and letters of support for finance applications, this session will explore the key dos and don'ts:

- Certification: to whom and what standard of evidence is required?
- Assessing the Control Test in relation to trusts, companies and SMSFs
- Measuring Gross Income and Net Assets of various entities
- Wealth test versus financial literacy – does it matter?
- Risks of finance application support and capacity-to-pay letters, and
- Professional/TPB obligations.





Emerging Leaders

Session 3.5: The Do's and Don'ts of Division 7A

Speaker: Kaitilin Lowdon, ATI, Arnold Bloch Leibler

Division 7A continues to be significant for private companies. In the absence of long-awaited reforms, the provisions continue to apply as drafted. The ATO continues to receive data on Division 7A, and for many clients the issue is a perpetual one. This session will cover:

- A short refresher on the basics
- Non-cash 'payments' – what's in and what's out
- Having the Division 7A discussion with your client – is it really their money?
- What's the plan to get the Division 7A monkey off your client's back?

Session 4.5: Individual Residency

Speaker: Melanie Baker, CTA, Victorian Bar

An Australian resident is assessable on income derived from all sources, but a non-resident is generally only assessable on income derived from sources in Australia. Therefore, the question of residence assumes greater importance in determining tax liability and is one area all practitioners need to be across. This session covers areas that practitioners should be familiar with, including:

- The tests for determining Australian residency for income tax purposes
- Taxation rulings, and
- Temporary residency versus Australian resident, and the resulting consequences.

Session 5.5: Recent trends – Capital versus Revenue

Speaker: *To be announced*

The concept of capital versus revenue has been a part of the income tax law since the beginning, and is still an important concept to this day. Even though Australia has a detailed capital gains tax regime, the characterisation of a gain (or loss) as capital or revenue can have significant implications across a number of areas. It has a significant impact on property transactions, and flow on effects into deductions and GST.

This session provides a back-to-basics analysis of the concept, providing highlights of the issue and guidance as to what to look for in such transactions. It will also consider recent trends in this area, the focus of the ATO and the main recent cases that continue to shape this area.

Session 6.5: Revisiting Goodwill

Speaker: Dr Nick Gangemi, CTA, William Buck

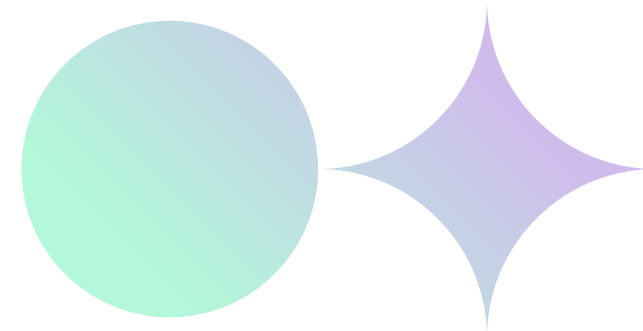
Goodwill as a concept is important in both a legal and a commercial setting.

In a legal setting, it has an impact across a number of areas of law, from taxation to commercial transactions to the law of passing off. In the commercial setting, goodwill is recognised as an asset for accounting purposes.

All practitioners, particularly those new to the profession, need to understand goodwill and implications that arise because of its existing.

The purpose of this session is to provide a refresher on what is goodwill and its tax implications, and will cover the following topics:

- The legal definitions of goodwill, as espoused in the cases of Muller's Margarine, Murry and Placer Dome
- Contrasting the accounting and legal definitions
- Valuing and transferring goodwill
- The impact of goodwill on tax, and
- The impact of recent cases





International

Session 10.4: BEPS Pillar 1 and 2

Speaker: Liz Cullinan, EY

The BEPS reform agenda has been continuously evolving to address tax avoidance and create a more transparent global tax system. BEPS Pillar 1 focuses on reallocation of taxable income between jurisdictions, whereas the focus of BEPS Pillar 2 is to ensure that income is taxed at the appropriate rate.

This session will consider the lessons from Pillar 1 so far and what are the key issues that corporates should be preparing for in relation to Pillar 2, as against the current landscape of ATO powers and review activity.

Session 11.4: BEPS Pillar 2 – Practicalities and realities

Speakers: Natalie Chang, FTI, Rio Tinto, Thana Geldenhuys, CTA, Atlassian, Sandie Parker, Canva, Pete Rhodes, ATI, Aristocrat

Facilitator: Sandra Farhat, FTI, EY

Pillar 2 has progressed, slowly but surely, and organisations will need to consider their exposure and, plan accordingly, and will be required to demonstrate compliance with the rules.

Given the complexity of the rules and the international overlay, this will not be an easy task. In this session we will hear from leading organisations about their journey in preparation for Pillar 2 and what they are doing to ensure they make the most out of the time available to them to get ready.

Session 13.4: Intangibles

Speakers: Chris Ferguson, Deloitte, Chris Hogger, PwC

A key focus the ATO is intangibles, in relation to royalties, and to the performance of development, enhancement, maintenance, protection and exploitation of DEMPE. There are a range of guidance materials that have been recently published, including TR 2021/D4, PCG 2021/D4 and Taxpayer Alerts TA 2020/1 and TA 2018/2 designed to provide guidance to taxpayers regarding the ATO's compliance approach to arrangements involving the mischaracterisation of intangibles and non-arm's length transactions.

Despite this guidance, taxpayers are faced with uncertainty in relation to their intangible arrangements, including those that have been on foot for some time. This session will explore how taxpayers are to address that uncertainty at the time of adopting a filing position and when faced with compliance activity by the ATO.

Session 14.4: Diverted Profits Tax and Multinational Tax Avoidance Law

Speakers: Sandra Farhat, FTI, EY, Niv Tadmor, CTA, Jones Day

As the first Diverted Profits Tax case hits our courts, mystery continues to surround this anti-avoidance rule and its sister rule, the Multinational Anti-Avoidance Law.

Both rules are key tools in the ATO's anti-avoidance arsenal, yet uncertainty remains as to when the ATO will seek to apply the rules and how organisations can engage the ATO to avoid disputes in this arena.

In this session we will learn about circumstances where the ATO is considering the DPT and the MAAL and how organisations can prepare if the ATO advises that the rules are potentially in scope.

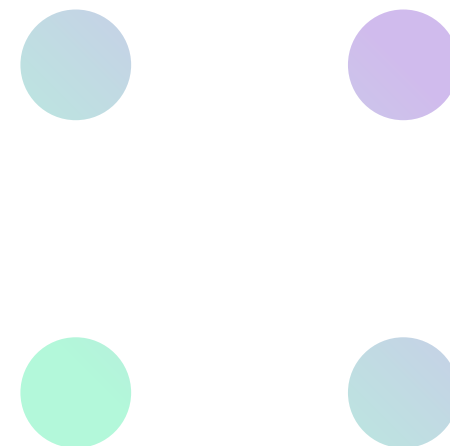
Session 15.4: International developments – What's happening overseas?

Speaker: Amelia Teng, Deloitte

As the saying goes 'imitation is the sincerest form of flattery', so it makes sense to pay attention to key tax developments in our closest trading neighbours and key global markets (which is not to say that we in Australia do not have innovative tax policies!).

Given the relevance of global developments to many organisations and the impact that policy or administrative changes in one country can have across multiple jurisdictions, learning and leveraging from our global insights is a key learning tool for organisations.

In this session we will hear about key developments in the US, UK and in the Asia Pacific region and provide an insight into the impact this has on local organisations and their tax functions.





Professional Obligations

Session 10.5: Data Security and Professional Obligations in a Digital World

Speaker: *To be announced*

As busy professional advisors, we are constantly seeking more efficient ways of operating. Technology provides many innovative and time-saving tools, but it is important to ensure the products used do not inadvertently result in breaches of professional obligations.

This session will consider:

- Protection of client data, particularly when using cloud-based products
- Obligations and potential exposures in relation to client TFNs
- Remote access tools and data security
- Password policies and multi-factor authentication, and
- Virtual meeting software and potential vulnerabilities.

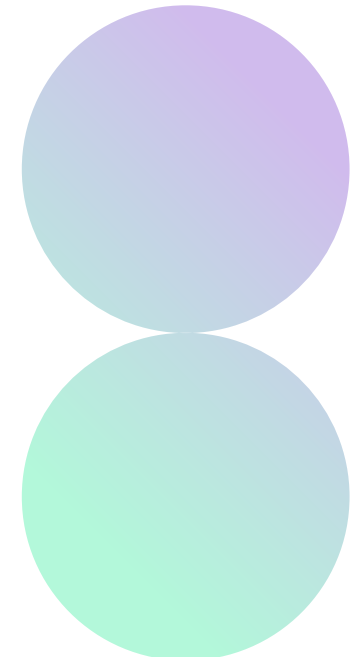
Session 11.5: Meeting Professional Standards in your Practice

Speaker: Debra Anderson, Tax Practitioners Board

Maintaining professional designations and registrations is essential to business – from both a compliance and best practice point of view.

This session will examine some topical issues relating to the management of professional practices, including:

- New TPB guidance on proof of identity
- Revisiting reasonable care in ascertaining the client's state of affairs, and
- Managing conflicts of interest.





Tax Disputes

Session 13.5: In-house perspectives – Dealing with ATO Reviews and Audits

Speakers: Michael Barbour, CTA, Westpac, Darren Day, Woolworths

Facilitator: Luke Imbriano, FTI, KPMG Law

As ATO levels of engagement and interaction continue to increase for many corporates, and the ATO's approach to Justified Trust and compliance programs intensifies, organisations need to be prepared for ongoing ATO scrutiny. While each organisation's experience with ATO engagement will differ, there are some common themes and trends to manage and maximise the benefits of ATO interactions. In this session we will hear from a mix of in-house advisers, each with a unique perspective and experience in managing their ATO engagement but also in managing their own internal stakeholders.

Session 14.5: Tax Disputes and Evidence

Speakers: The Hon Jennifer Davies, SC, Angelina Lagana, CTA, KPMG Law

In order to avoid a lengthy audit or dispute with the ATO, one must think about the facts and evidence to support the position adopted by a taxpayer. This panel session will provide views from a retired judge and preeminent tax barrister along with a tax disputes lawyer on:

- the importance of facts and evidence in a dispute, including the critical role that taxpayers and in house functions have in this regard;
- the role of barristers, solicitors, tax advisors at all stages of an audit or dispute – along with the

important role that the taxpayer and non tax stakeholders within the business can play; and

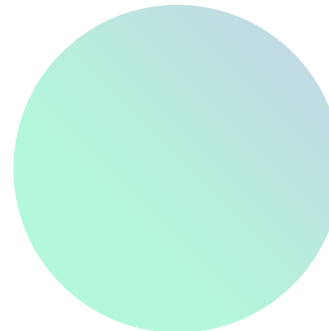
- how to manage and avoid a controversy and how the approach and strategy might differ at all stages of the tax dispute continuum.

Session 15.5: ADR and Early engagement

Speakers: Ram Pandey, CTA, Australian Taxation Office, Annemarie Wilmore, CTA, Johnson Winter & Slattery

'The early bird catches the worm'....apt even in a tax environment! Engaging early to obtain certainty, avoid (and resolve) disputes and foster transparency should be a key element of any risk management strategy. Crossing your fingers and hoping you don't get a knock on the door is not only a poor strategy, but also bad governance and exposes organisations to avoidable risks. Conversely, heading full speed to the steps of the courtroom is also not a good strategy for managing ATO disputes.

In this session we will hear about different avenues to engage early and resolve disputes with the ATO, their pros and cons and the ways taxpayers can engage with the ATO from pre lodgement right through to ADR.





Going Global

Session 17.4: So my client wants to go offshore – now what?

Speakers: Thomas Howker, BDO, Charl van Den Berg, BDO

Expanding a business outside of Australia's borders is becoming increasingly common even for smaller businesses. This session will examine some key tax issues which may need resolving prior to operating in a new market, including:

- Residency
- Structuring overseas operations and repatriation of profits
- Registration requirements
- Treatment under Australian tax law including CFCs, and foreign hybrids, and
- Related party transactions issues, including transfer pricing and thin capitalisation.

Session 18.4: Cross border interactions in the SME space

Speaker: Danielle Sherwin, CTA, RSM

As life, behaviours and enterprise become more globalised, there is an increasing number of cross border interactions within the SME sphere.

At times issues arise that may necessitate a restructure and review of all available roll-overs for cross border structures (eg where shareholders already have Australian and foreign entities). This session explores:

- How such restructures and reviews may impact access to concessions, and
- Other taxation issues that can create issues.

Session 19.4: Foreign companies doing business in Australia

Speaker: Neil Periera, CTA, Deloitte

Business in Australia can be fraught with legal and regulatory burdens. While several businesses intentionally establish themselves in Australia, some find themselves accidentally arriving here. This session will focus on foreign businesses expanding into Australia (intentionally or accidentally) and consider the opportunities that can arise. Topics that will be covered include:

- When is a company considered to be 'doing business in Australia' (ASIC requirements and permanent establishment)?
- Structuring issues (subsidiaries v branches)
- Tax issues (income tax, transfer pricing, GST)
- Obligations surrounding local employees employed by foreign companies, and
- Short term projects.





Digital

Session 17.5: Digital Assets

Speakers: Julian Humphrey, CTA, KPMG, Luke Imbriano, FTI, KPMG Law

Levels of digital asset innovation, ownership, understanding and use have never been greater, but more than a decade since bitcoin was first invented, the digital asset roller coaster continues, leaving investors, traders, innovators, businesses and enthusiasts wondering: is this the digital revolution or a Dutch tulip?

From a tax perspective, the significant rise and fall of digital asset prices has only brought to sharper focus a number of key tax considerations associated with owning and trading digital assets. In this session, Julian Humphrey and Luke Imbriano will explore these key tax considerations, including:

- An overview of the income tax outcomes arising out of digital asset ownership and trading, including cryptocurrency, Decentralised Finance (“DeFi”) assets, staking rewards and airdrops, and non-fungible tokens (“NFTs”);
- Common pitfalls to be aware of in a falling market, including loss or theft of digital assets, unfunded tax liabilities, verification of data and substantiating tax losses;
- The ATO’s evolving views on cryptocurrency and the issues that may arise; and
- The roadmap for the development of a digital asset tax framework in Australia.

Session 18.5: Transforming your Tax Function – the key to tax technology

Speakers: Pete Sanders, EY, Caroline Wright, EY, Andy Hung, Wolters Kluwer

As tax functions become more and more stretched and the need to prioritise projects and resources becomes paramount, ‘work smarter not harder’ becomes the mantra of the tax function of the future. Technology has become the tax function’s new best friend and provides endless opportunities to rationalise and focus on the big picture and key deliverables.

In this session, we will hear about how technology can help shape the tax function of the future and how enhanced technology and data improvements can take the weight off the shoulders of tax managers.

Session 19.5: Data – How to use it and how it is being used

Speaker: Marek Rucinski, Australian Taxation Office

2021 brought with it new forms and new disclosures for taxpayers and tax advisors, and Single Touch Payroll (Phase 2) commenced from 1 January 2022. There is an ever-increasing volume of data being collated by taxpayers and advisers and being provided to the ATO, but what happens post-lodgement? How can taxpayers use this data, which often requires so much time and effort to collect, to create value and efficiency?

Activities



Included networking activities

Our biggest networking opportunities are included in your package.



Welcome Reception The Jackson

Named after the shimmering waters of Sydney Harbour (Port Jackson), The Jackson embodies the beauty and elegance that exemplifies Sydney's magnificent harbour. Join us for cocktails, canapes and a sunset cruise.

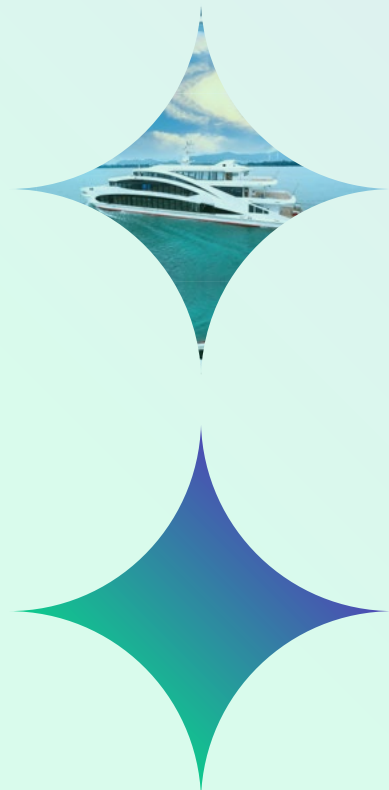
Date	Wednesday, 19 October 2022
Time	5.30 – 7.30pm
Price	Included in the full registration fee. Additional tickets \$80 per person.
Dress	Business or business casual

Gala Dinner and the Tax Adviser of the Year Awards ceremony Grand Ballroom, ICC Sydney

Incorporating the Tax Adviser of the Year Awards ceremony, the event recognises the outstanding achievements of the best tax practitioners in. This years award categories are:

- Chartered Tax Adviser
- Emerging Tax Star
- Tax Adviser – Accountant **New!**
- Tax Adviser – Lawyer **New!**
- Inhouse Tax Adviser **New!**

Date	Thursday, 20 October 2022
Time	7.00pm onwards
Price	Included in the full registration fee. \$175 per person / \$1,750 per Table of 10
Dress	Black Tie, Theme: Diamonds are Forever



Optional Networking Activities



Option 01 Cold Ales & Crime Tales

Date	Wednesday, 19 October 2022
Time	7.30pm onwards
Price	\$75
Venue	Journey Walks Tours
Inclusions	Guided Tour

Discover the secret life of Sydney's oldest pubs on a private experience that blends hops, history and much more. Exploring the many faces of the murky maritime village of Millers Point, this private tour uncovers sensational Sydney stories to create a unique historical odyssey.



Option 02 Woodcut

Date	Wednesday, 19 October 2022
Time	7.30pm onwards
Price	\$225
Venue	Woodcut
Inclusions	3 course dinner and beverages

Woodcut offers patrons a unique dining experience that celebrates Australian produce and cooking with wood, charcoal and steam. Find out first-hand what all the buzz is about and experience one of the jewels in Sydney's newest fine dining playground within Crown.

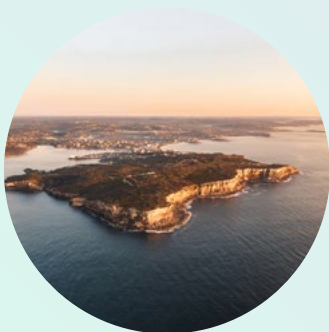


Option 03 Cirrus

Date	Wednesday, 19 October 2022
Time	7.30pm onwards
Price	\$125
Dress	Smart casual
Inclusions	3 course dinner and beverages

Dine at one of Sydney's finest waterfront restaurants. Sitting within the Barangaroo precinct, this restaurant specialises in seafood with a superb menu reflecting the location. It's stunning interior plays on the harbourside location and nautical heritage. Coupled with the extensive wine list, it is a perfect match for a first class dining experience.

If you have a day to spare



Day trip A walk in the park

Place	Sydney Harbour National Park
Price	Free
Website	nationalparks.nsw.gov.au/visit-a-park

Sydney Harbour National Park is jewel of the city. Explore the islands on a foreshore walk, delve into colonial and Aboriginal heritage, and revel in some of the best views in town.

Day trip Culinary delights

Place	Berry and Berrima
Price	From \$175
Website	highlandsfoodandwinetours.com.au

Settled in the lush Southern Highlands countryside, visit historic towns full of character and charm. Enjoy some delicious local wines, some insta-famous food and admire the beautifully preserved Georgian heritage.



Day trip Back to nature

Place	Blue Mountains
Price	\$95
Website	bluemountainstoursydney.com.au

A Blue Mountains day tour offers breathtaking views spectacular wildlife, historic rock formations and sandstone cliffs.



Day trip Sparkling gem

Place	Sapphire Coast
Price	From \$75
Website	sapphirecoastaladventures.com.au

Take a bit of time to go a little further afield and be rewarded with this gem-like stretch of coast, the most southerly in the state. Guaranteed whale watching available from August through November.

In your own time



Activity

Pride of the city

Place	Taronga Zoo
Price	From \$27 (child) \$45 (adult)
Website	taronga.org.au/sydney-zoo/lion-cubs

Perfect for a day out! Take the family to visit the Zoo's newest attraction – baby lion cubs!



Activity

Fly and dine

Place	Sydney Sea Planes
Price	From \$400
Website	seaplanes.com.au/packages/sydney-secrets

Discover Sydney's secrets with a bird's eye view on board it's famous Sea Planes.

Think you have experienced all that Sydney has to offer? Think again! A fly and dine package will show you a new perspective of the city from above.



Activity

Heritage trail

Place	Journey Walks
Price	From \$125
Website	journeywalks.com/events

Join our friends from Journey Walks on one of their many fascinating tours exploring the unique tales, trails and tastes of Sydney of old. Histories, Mysteries and Whiskies is one of their most popular, a captivating tour that brings to life Sydney's sinister secrets while sampling delicious drams.



Activity

After dark

Place	YCK Precinct
Price	Free
Website	ycklaneways.com.au

Take a self-guided tour and explore some of Sydney's many hidden bars, collectively known as YCK in and around York, Clarence and Kent Streets. Behind shop fronts, barber shops and hidden staircases, the search for some of Sydney's finest will be worth it. Uncle Ming's, Stitch Bar, Old Mates and Lobo Plantation are to name just a few!

Getting there

Places to stay

Conference National has negotiated discounted flights and accommodation for delegates travelling to Sydney.

Book your trip today by visiting: conferencenational.com.au/taxsummit2022



4 min walk to ICC

**Sofitel Sydney
Darling Harbour**



Rate \$400 per night including breakfast



11 min walk to ICC

**Novotel
Darling Harbour**



Rate \$320 per night including breakfast



9 min walk to ICC

**Oaks Sydney
Goldbrough Suites**



Rate \$309 per night including breakfast



8 min walk to ICC

**Holiday Inn
Darling Harbour**



Rate \$259 per night including breakfast



7 min walk to ICC

**Ibis
Darling Harbour**



Rate \$260 per night including breakfast

Event info

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

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

Attendance at the conference counts for 20 hours of Continuing Professional Development with The Tax Institute.

Discounts

Advance Pricing

All registrations received and paid for on or before Friday 26 August 2022 will be entitled to an advance registration discount.

Early bird

All registrations received and paid for on or before Friday 23 September 2022 will be entitled to an early bird discount.

Group

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

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

The Tax Institute'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.

Getting Around

ICC Sydney

By car or taxi: From Sydney Airport, it is approximately 15 minutes travel time.

Flights: Qantas, Virgin Australia and Jetstar operate services to Sydney. Delegates are advised to book early to secure best pricing.

For convenience, visit the website www.sydney.com for information on getting around Sydney and surrounding areas.

Sydney weather

In October in Sydney, the spring days are warmer and daylight savings is in place. Average daily temperature sits around 23 degrees celsius.

Networking Activities

Welcome reception

This year the Welcome Reception will be held onboard the Jackson. The Tax Institute team will be on hand to provide you with directions to the vessel, which will be a short walk from the International Convention Centre.

Those attending an optional social activity on Wednesday evening will receive a confirmation email approx. 1-2 weeks prior to the event with more information on transportation arrangements for these activities. In 2022, all social options are within walking distance from both the ICC and the wharf where the Welcome Reception cruise will dock on the evening.

Gala dinner and the Tax Adviser of the Year Awards ceremony

This year The Tax Summit Gala Dinner will be held at the International Convention Centre in the Grand Ballroom.

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.

COVID-19 Event Guidelines

At The Tax Institute, the health and wellbeing of our members, delegates and employees is our top priority. Whilst returning to face-to-face events, we continue to actively monitor the situation regarding COVID-19 and follow the latest advice and guidelines issued by the Department of Health, the World Health Organisation and relevant State authorities.

Please note, final implementation of any of these measures is subject to Federal and State Government requirements at the time of each event. To see The Tax Institute's full COVID-19 Event Guidelines, [click here](#).

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.

If a registered delegate is unable to attend as a result of a diagnosis of COVID-19 or they are experiencing symptoms of COVID-19, a full refund will be offered with the provision that a medical certificate is produced explaining the diagnosis or a summary of the appropriate action to be taken i.e. a COVID-19 test and medical advice.

If a registered delegate is unable to attend a face-to-face event as a result of interstate border closures or they reside in or visited a COVID-19 hotspot, we will endeavour to transition the registration to an online registration for the event. If there is a difference in price a credit will be provided to delegates to be used at a future event. If a delegate does not wish to transition their registration to the alternate online event, a full refund/credit will be provided.

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>.

Register now

Online taxinstitute.com.au/taxsummit

Email customeradmin@taxinstitute.com.au

Phone 1300 733 842

Post The Tax Institute
GPO Box 1694, Sydney NSW 2001

Save
\$400

Advanced registration
before 26.08.22

Save
\$200

Early bird registration
before 23.09.22

Individual ticket



This full registration ticket gives you access to the full Summit experience.

Inclusions

- ✓ Participation in the full program
- ✓ Online access to presentations and technical papers via The Tax Institute CPD app
- ✓ Welcome reception and gala dinner
- ✓ Catering and refreshments during Summit hours

Exclusions

- × Travel, accommodation or hotel incidentals

Employer ticket



This multi-user registration allows registration of up to 6 delegates from the same organisation.

Inclusions

- ✓ Participation in a maximum of 12 breakout sessions
- ✓ Online access to presentations and technical papers via The Tax Institute CPD app
- ✓ Welcome reception and gala dinner
- ✓ Catering and refreshments during Summit hours

Exclusions

- × Travel, accommodation or hotel incidentals

Become a Tax Summit partner

We have multiple sponsorship and exhibition opportunities available. Register your details to request more information and a copy of our sponsorship prospectus. Alternatively, contact Brian Martin, Business Relationship Manager at brianmartin@taxinstitute.com.au or call direct on +61 8 6165 6601.

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 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

2 Full conference registration

	Member	New member*	Non-member
Advanced registration Received on or before 25 August 2022	<input type="checkbox"/> \$1600	<input type="checkbox"/> \$1940	<input type="checkbox"/> \$1900
Early bird registration Received on or before 23 September 2022	<input type="checkbox"/> \$1800	<input type="checkbox"/> \$2140	<input type="checkbox"/> \$2100
Standard registration Received after 23 September 2022	<input type="checkbox"/> \$2000	<input type="checkbox"/> \$2340	<input type="checkbox"/> \$2300

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

To book accommodation, please visit our dedicated website courtesy of our travel provider, ConferenceNational: conferencenational.com.au/taxsummit2022

*SPECIAL NEW MEMBER OFFER



The new member registration fee includes the fee for Affiliate level membership of The Tax Institute so that you can take advantage of the many benefits membership affords. Membership is extended until 30 June the following year. Please read and sign this box to take up 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:

3 Technical session selections

									
SME	Corporate	Hot Topics	Professional Practice	Emerging Leaders	International	Professional Obligations	Tax Disputes	Going Global	Digital

Wednesday 19 October 2022

10:30am–11:30am	<input type="checkbox"/> Session 3.1	<input type="checkbox"/> Session 3.2	<input type="checkbox"/> Session 3.3	<input type="checkbox"/> Session 3.4	<input type="checkbox"/> Session 3.5
11:30am–12:30pm	<input type="checkbox"/> Session 4.1	<input type="checkbox"/> Session 4.2	<input type="checkbox"/> Session 4.3	<input type="checkbox"/> Session 4.4	<input type="checkbox"/> Session 4.5
1:30pm–2:30pm	<input type="checkbox"/> Session 5.1	<input type="checkbox"/> Session 5.2	<input type="checkbox"/> Session 5.3	<input type="checkbox"/> Session 5.4	<input type="checkbox"/> Session 5.5
3:00pm–4:00pm	<input type="checkbox"/> Session 6.1	<input type="checkbox"/> Session 6.2	<input type="checkbox"/> Session 6.3	<input type="checkbox"/> Session 6.4	<input type="checkbox"/> Session 6.5

Thursday 20 October 2022

10:30am–11:30am	<input type="checkbox"/> Session 10.1	<input type="checkbox"/> Session 10.2	<input type="checkbox"/> Session 10.3	<input type="checkbox"/> Session 10.4	<input type="checkbox"/> Session 10.5
11:30am–12:30am	<input type="checkbox"/> Session 11.1	<input type="checkbox"/> Session 11.2	<input type="checkbox"/> Session 11.3	<input type="checkbox"/> Session 11.4	<input type="checkbox"/> Session 11.5
2:00pm–3:00pm	<input type="checkbox"/> Session 13.1	<input type="checkbox"/> Session 13.2	<input type="checkbox"/> Session 13.3	<input type="checkbox"/> Session 13.4	<input type="checkbox"/> Session 13.5
3:30pm–4:30pm	<input type="checkbox"/> Session 14.1	<input type="checkbox"/> Session 14.2	<input type="checkbox"/> Session 14.3	<input type="checkbox"/> Session 14.4	<input type="checkbox"/> Session 14.5
4:30pm–5:30pm	<input type="checkbox"/> Session 15.1	<input type="checkbox"/> Session 15.2	<input type="checkbox"/> Session 15.3	<input type="checkbox"/> Session 15.4	<input type="checkbox"/> Session 15.5

Friday 21 October 2022

9:30am–10:30am	<input type="checkbox"/> Session 17.1	<input type="checkbox"/> Session 17.2	<input type="checkbox"/> Session 17.3	<input type="checkbox"/> Session 17.4	<input type="checkbox"/> Session 17.5
11:00am–12:00pm	<input type="checkbox"/> Session 18.1	<input type="checkbox"/> Session 18.2	<input type="checkbox"/> Session 18.3	<input type="checkbox"/> Session 18.4	<input type="checkbox"/> Session 18.5
12:00pm–1:00pm	<input type="checkbox"/> Session 19.1	<input type="checkbox"/> Session 19.2	<input type="checkbox"/> Session 19.3	<input type="checkbox"/> Session 19.4	<input type="checkbox"/> Session 19.5

4 Social Function selections

DAY ONE – WEDNESDAY 19 OCTOBER 2022

Welcome reception

The Summit welcome reception on Wednesday 19 October 2022 is included in the full Summit registration fee.

☐ I confirm I WILL attend the welcome reception OR

☐ I WILL NOT attend

Additional tickets to Welcome reception	Cost	No.of tickets	Name/s and dietary requirements
<input type="checkbox"/> YES, I require additional tickets	\$80		

Wednesday night optional social activities

The evening activities on Wednesday 19 October 2022 are NOT included in the registration fees. Please indicate whether you will attend any of the following activities. Note there are maximum numbers and attendance is subject to availability.

☐ I confirm I WILL NOT attend any of the optional social activities

	Cost	No.of tickets	Name/s and dietary requirements
<input type="checkbox"/> Option 1: Cold Ales and Crime Tales	\$75		
<input type="checkbox"/> Option 2: Cirrus Dining	\$125		
<input type="checkbox"/> Option 3: Woodcut	\$225		

DAY TWO –THURSDAY 20 OCTOBER 2022

Gala dinner and Tax Adviser of the Year Awards ceremony

The Tax Summit gala dinner on Thursday 20 October 2022 is included in the full Summit registration fee. For catering purposes, please indicate whether you will attend the dinner.

☐ I confirm I WILL attend the gala dinner OR

☐ I WILL NOT attend

Additional tickets to Gala dinner	Cost	No.of tickets	Name/s and dietary requirements
<input type="checkbox"/> YES, I require additional tickets	\$175		
<input type="checkbox"/> Table of 10: YES, I require additional tickets to complete my table of 10 Guest names must be advised in writing no later than Tuesday 4 October 2022	\$1750		

4 Payment summary

Summit registration

\$

Optional social activities

\$

Welcome reception– additional guest tickets (\$80 each)

\$

Gala dinner – additional guest tickets (\$175 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 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

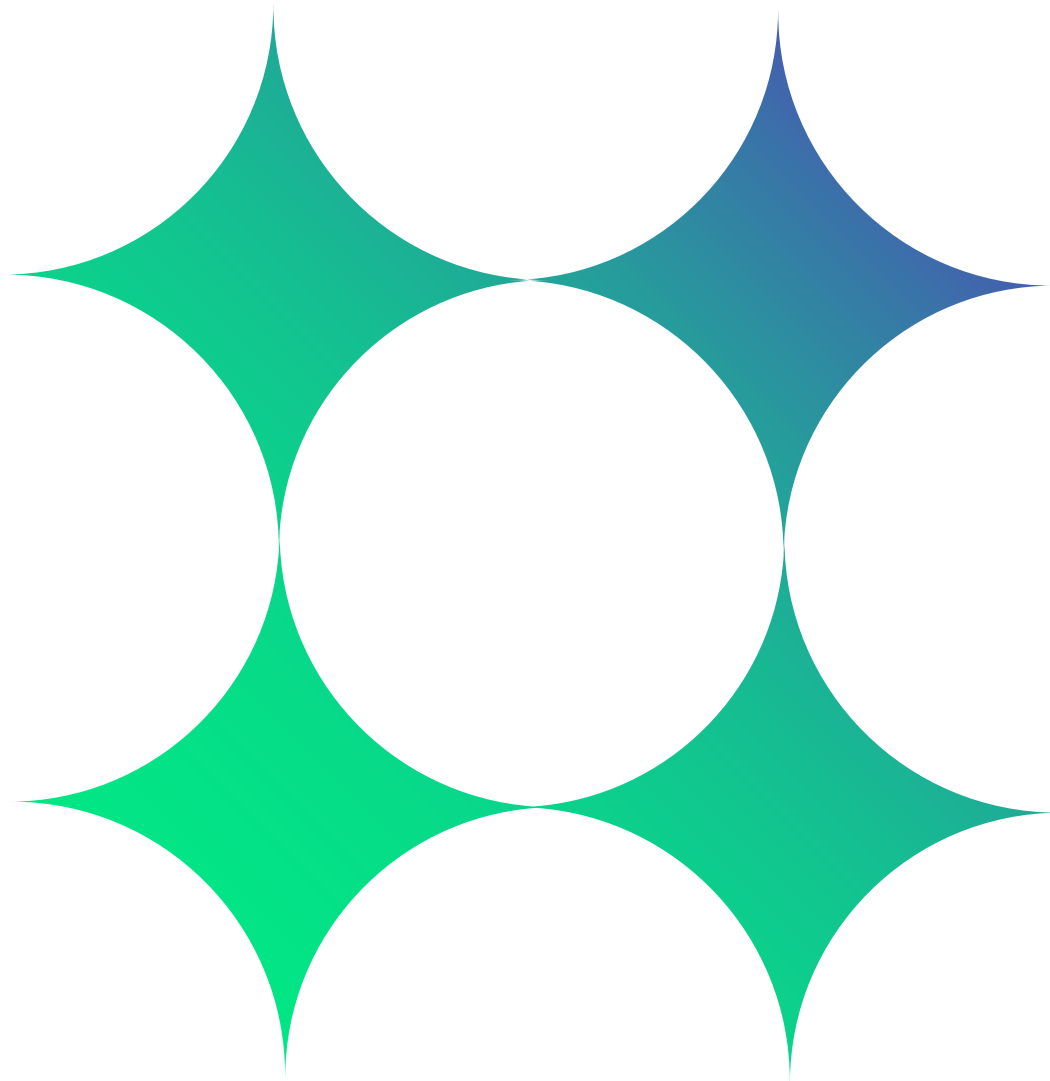
Email customeradmin@taxinstitute.com.au

Mail L37, 100 Miller Street North Sydney NSW 2060

Online taxinstitute.com.au/tax-summit

Thank you

The Tax Institute gratefully acknowledges the generous assistance of members of the Tax Summit Organising Committee and The Tax Summit Program Committee.



The Tax Summit Organising Committee

Jerome Tse, CTA, President, The Tax Institute, Chair
Leanne Connor, CTA, WGC Business Advisors
Peter Godber, CTA, Past President, The Tax Institute
Sandra Farhat, CTA, EY
Vanessa Priest, CTA, Baskin Clarke Priest
Marg Marshall, CTA, WLF Accounting Advisory
Scott Treatt, CTA, The Tax Institute
Todd Want, CTA, William Buck

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Chris Wallis, CTA, Victorian Bar
Annemarie Wilmore, Johnson Winter & Slattery
Adrian Zuccarini, FTI, Australian Taxation Office



We can't wait to see you there.

Contact us

1300 829 338

nationalevents@taxinstitute.com.au

