



THE TAX INSTITUTE



VIC 8th Annual Tax Forum Online

15 October – 5 November 2020 | Online

12 CPD hours

Welcome

Guidance and direction in uncertain times

As we head towards the tail end of an extraordinary and challenging 2020, the circumstances faced by the tax profession and our clients could not be more stark or different from those in years past.

We have seen an unprecedented impact on Australian industry and livelihoods due to both the 2019–20 bushfires and the COVID-19 pandemic, coupled with unprecedented levels of government support for businesses and individuals through JobKeeper, JobSeeker and the Cash Flow Boost at the Federal level. Varying levels of tax relief and cash support have been, and continue to be, offered by state and territory governments around the country.

The 2020–21 Federal Budget was deferred from its traditional date in early May until 6 October 2020, with the expectation that it will set out a pathway to economic recovery for Australia.

With the impact of the COVID-19 pandemic to be felt across our profession and the broader community for years to come, there are growing calls for fundamental tax reform at all levels of government to meet these challenges. With unprecedented co-operation between State and Federal governments through the National Cabinet, now is the time to capitalise on this momentum of collaboration and seek genuine tax reform in Australia.

We understand this has been an incredibly challenging year as you have navigated your clients through stormy waters and adapted to rapidly implemented and substantial tax changes. The program for this year's VIC 8th Annual Tax Forum is designed to equip you with the latest knowledge and information so you can continue to best advise and assist your clients through these difficult times.

Highlights include:

- Assistant Treasurer, **The Honourable Michael Sukkar MP**, delivering our Keynote talk on Federal Government tax policy in light of numerous evolving national and global challenges.
- **Frank Hinoporos**, Tax Partner at Hall & Wilcox, analysing key measures in the 2020–21 Federal Budget affecting the SME sector.
- **James O'Halloran**, Deputy Commissioner, JobKeeper Payment Program, and **Andrew Orme**, Deputy Chief Tax Counsel, providing their insights into the ATO's approach to COVID-19 related measures.

I would like to particularly thank the organising committee and The Tax Institute staff for their efforts in pulling this event together in challenging circumstances. You will note this year's event is being delivered entirely online due to current and potentially ongoing restrictions in Melbourne.

We look forward to you joining us for this year's stellar line up of speakers and topics.



Aaron Fitchett, CTA

Chair, VIC 8th Annual Tax Forum Online Organising Committee

Forum highlights



The Hon Michael Sukkar MP

Assistant Treasurer, Australian Government



James O'Halloran

Deputy Commissioner, JobKeeper Payment Program, Australian Taxation Office



Andrew Orme

Deputy Chief Counsel, Australian Taxation Office



David Plank

Head of Australian Economics, ANZ Banking Group



Robyn Jacobson, CTA

Senior Advocate, The Tax Institute



Andrew Mills, CTA-Life

Director, Tax Policy and Technical, The Tax Institute

*Flexible registration options available
See page 17 for more details*

Technical program

Week 1 – Thursday, 15 October 2020

Time	Corporate stream	SME stream	Hot topics stream
8.50–9.00am	Welcome and opening address Speaker: Peter Godber, CTA, President – The Tax Institute		
9.00–10.00am	Session 1: Keynote address from the Hon Michael Sukkar MP Speaker: The Hon Michael Sukkar MP, Assistant Treasurer As the Assistant Treasurer, the Hon Michael Sukkar MP, is centrally involved with the government's tax policy. The global and national tax landscape has changed significantly over the last decade, presenting numerous challenges for the government to reform and modernise Australia's tax system. The bushfire crisis, the floods and the COVID-19 pandemic this year have compounded to bring additional and unforeseen challenges to the economy. The Assistant Treasurer will cover some of the most topical issues the government is currently facing in these areas.		
10.00–10.15am	Delegate break		
10.15–11.15am	Session 2A: M&A and Coronavirus: a crown of thorns Speaker: Enzo Coia, CTA, Deloitte; James Gould, Deloitte The Australian tax system has inherent features that inadvertently compound the negative impacts of difficult trading periods. In response to the coronavirus, some taxpayers have needed to raise capital, others have suffered significant losses. For other taxpayers, previously unplanned acquisitions or disposals of businesses have or will occur. This session will use examples to cover the Australian income tax impacts indirectly arising from the coronavirus on: <ul style="list-style-type: none"> – The ability to use tax losses in the future – The impact of refinancing or writing off debts – The reduced ability to gear ongoing operations and associated thin capitalisation impacts – The tax consolidation impacts of acquiring distressed entities or selling loss making businesses 	Session 2B: 2020-21 Budget update: What's hot? Speaker: Frank Hinoporos, CTA, Hall & Wilcox Lawyers In one of the most challenging economic times in Australia's history, the Government will be delivering its delayed 2020–21 Federal Budget on 6 October 2020. In this session, Frank will analyse the key Budget issues and measures that affect the SME sector. The discussion will include: <ul style="list-style-type: none"> – New tax and superannuation policy measures – Status of previous policy measures affecting SMEs – What lays ahead for SMEs 	Session 2C: Property panel Panelists: Greg Hocking, Hocking Real Estate; Cressida Wall, Property Council of Australia; Len Warson, Glenvill Facilitator: Mark Wizel Despite being at the epicentre of Australia's COVID-19 outbreak, Melbourne remains a sought-after destination. Having said that, the Victorian property and construction industry has been put on high alert as the state faces a recession with high unemployment rates. With the introduction of the HomeBuilder program, the government hopes to slow down the drop in sales of new homes and generally improve market confidence. The discussion will include: <ul style="list-style-type: none"> – Stop check: Impact of COVID-19 – Future of property market: commercial/residential/industrial/retail – Stats: Melbourne population growth v demand for new homes/apartments – Legislative change: is there a requirement for an overhaul on stamp duty?
11.15–11.30am	Delegate break		

Technical program

Week 1 – Thursday, 15 October 2020 continued

Time	Corporate stream	SME stream	Hot topics stream
11.30am–12.30pm	<p>Session 3A: Capital or Revenue – Implications of the counterfactual</p> <p>Speakers: Dioni Perera, FTI, King & Wood Mallesons; Shashi Sivayoganathan, Transurban</p> <p>The High Court decision in Sharpcan has broadened the matters for consideration when distinguishing between capital and revenue. Tax practitioners must now turn their minds to the notion of a counterfactual in considering whether an expense or payment provides an enduring benefit. This session explores the meaning and implications of this requirement against the backdrop of leading decisions on the capital/revenue issues, more recent cases and ATO guidance. Topics covered in this session include:</p> <ul style="list-style-type: none"> – Analysis of Sharpcan – Relevance and comparison against recent and seminal capital / revenue cases – Future landscape of capital/revenue analysis 	<p>Session 3B: Tax effective resolution of trust and estate disputes: making the best of a bad situation</p> <p>Speaker: Nathan Yii, CTA, Nathan Yii Lawyers</p> <p>During the COVID-19 pandemic, there has been an increase in trust and estate dispute matters. Clients often leave the disputes to lawyers to handle without having input from their tax advisors and this is often to the family's peril. To encourage tax advisors to work collaboratively with lawyers to settle a dispute in a tax-effective manner, this session will draw upon a case study, to illustrate how we can make the best of a bad situation. This session will consider:</p> <ul style="list-style-type: none"> – The nature of a dispute in wealth distribution and the claims at hand – Ownership structures including personally held, family trust and superannuation – The tax implications in dealing with estate and wealth disputes and not losing track of the tax bill – Tax-effectively addressing estate disputes by agreement or court order – what's the difference and what do they deal with? – Division 128 CGT Rollover and Victorian duty concessions on death and applying them in a dispute context – Factoring in superannuation death benefits in the dispute and minimising death benefits tax; and – Transferring control of family discretionary trusts without triggering tax – Using tax planning as a bargaining tool in negotiating an outcome; and – Remembering prevention is far better and cheaper than a cure 	<p>Session 3C: Tax conflict management</p> <p>Speakers: Graeme Halperin, CTA, Halperin & Co.</p> <p>Graeme Halperin will examine alternative ways for managing tax conflicts, which practitioners find intensely challenging, especially when trying to balance competing client and ATO expectations. Topics to be covered include:</p> <ul style="list-style-type: none"> – Alternative Dispute Resolution offered by the ATO, including In-House Facilitation – Freedom of Information applications and reviews – The ATO's model litigant obligations – Evidence requirements, including an examination of broader evidentiary issues and those relevant to income v capital treatments (eg in the context of property sales) – ATO debt compromises

Technical program

Week 2 – Thursday, 22 October 2020

Time	Corporate stream	SME stream	Hot topics stream
9.00–10.00am	Session 4: Update on COVID-19 stimulus measures Speakers: James O'Halloran, Australian Taxation Office; Andrew Orme, Australian Taxation Office This session will provide an update on COVID-19 stimulus measures, focusing on JobKeeper and Cash Flow Boost. Topics covered will include: <ul style="list-style-type: none"> – ATO focus areas – Compliance activities – Schemes – Overpayments and the resolution of disputes 		
10.00–10.15am	Delegate break		
10.15–11.15am	Session 5A: General ATO update for corporates Speaker: Chris Ferguson, Australian Taxation Office The ATO continues to address concerns with arrangements involving large corporate taxpayers, in this session you will hear about some of the key technical issues as well as the ATO's concerns where large market participants vary transfer pricing policies in response to the current economic environment.	Session 5B: Div 7A – Emerging from COVID-19 Speaker: Ron Jorgensen, CTA, Thomson Geer Lawyers Recent ATO guidance and a further deferral of the proposed Div 7A reforms has thrown up uncertainty for taxpayers with loan arrangements in place with their private companies. This session will explain what these developments mean for your clients who have been affected by the COVID-19 crisis and how you can best plan for the future. The discussion will include: <ul style="list-style-type: none"> – The ATO's guidance for taxpayers who seek an extension of time to make the minimum yearly repayment for 2019–20 due to financial difficulties arising from COVID-19 – Implications of the Government's recent announcement to defer the start date of the proposed reforms – Where are we at with unpaid present entitlements and sub-trust arrangements? – Forgiving loans due to COVID-19 	Session 5C: Embracing technology Speaker: Alan FitzGerald, Practice Connections Advisory During the COVID-19 crisis, it has become apparent just how heavily dependent we are on technology and what a vital tool it is for any business or tax practice. In this insightful session, Alan will lead us down the path of technology developments from basic pebbles to Artificial Intelligence, including: <ul style="list-style-type: none"> – The rise of 'clever' tax tools with in-built additional capabilities that go beyond form-fillers – Data analytics capability of tax solutions – The use of technology to leverage tax data – The evolution of indirect tax capture – Automating the automatable and creating a more efficient tax preparation process
11.15–11.30am	Delegate break		

Technical program

Week 2 – Thursday, 22 October 2020 continued

Time	Corporate stream	SME stream	Hot topics stream
11.30am–12.30pm	<p>Session 6A: Legal Professional Privilege Speakers: Mia Clarebrough, Victorian Bar; Fiona Knight, CTA, Australian Taxation Office; Frank O'Loughlin QC, CTA, Victorian Bar</p> <p>Public statements from senior ATO figures have put a spotlight on legal professional privilege. It is important for practitioners to understand how LPP claims will be considered by the ATO in the current climate and why there might be increased scrutiny of LPP claims. This session will assess:</p> <ul style="list-style-type: none"> – ATO and taxpayer perspectives on LPP – The impact of the ATO challenging LPP in audits, risk reviews and in the courts – How taxpayers should approach LPP in tax disputes; and – LPP in large tax disputes following Glencore – The accountant's concession 	<p>Session 6B: Dealing with the fallout of COVID-19 Speaker: John Ioannou, CTA, Deloitte Legal Pty Ltd</p> <p>The COVID-19 crisis has challenged businesses and advisers in unimaginable ways as both have grappled to navigate businesses through the shutdown. As we start to emerge from the crisis, focus will turn to rebuilding, reshaping and reviewing current structures and processes for our clients. It will be important for advisers to:</p> <ul style="list-style-type: none"> – Identify opportunities to access small business CGT concessions for businesses that survive the fallout – Understand the tips and traps regarding the company and trust loss rules for entities that may be experiencing losses for the first time – Navigate through the plethora of forgiveness rules (Div 7A, commercial debt forgiveness and bad debts) – Know when to turn off the oxygen of a business — how safe is the insolvency safe harbour? 	<p>Session 6C: GST - Legal considerations for property developers Speaker: Chris Vittas, PKF Melbourne</p> <p>Property developers have a myriad of tax consideration – both direct and indirect. One of the most complex areas of tax with property development is GST. Over the past decade or so, there have been a number of cases that have either clarified the law or conversely has added to the uncertainty surrounding the interaction of GST in property development.</p> <p>This discussion will include:</p> <ul style="list-style-type: none"> – Contractual dealings – Margin Scheme – Withholding – Change in creditable purpose – Sales of commercial/residential housing – Audit defence



Technical program

Week 3 – Thursday, 29 October 2020

Time	Corporate stream	SME stream	Hot topics stream
9.00–10.00am	Session 7: Economic impact on the Budget from COVID-19 Speaker: David Plank, ANZ Banking Group The past year has impacted all aspects of tax and our daily business practices. This session will deliver a pacy and dynamic examination of the economic changes and demographic shifts will shape the business world in 2021. It will take an in-depth look at the current and future state of the Australian economy.		
10.00–10.15am	Delegate break		
10.15–11.15am	Session 8A: Seat 1A on the Digital Tax plane: chasing source – or chaos? Speakers: Jayde Thompson, PwC; Greg Weickhardt, PwC Work to revamp the international corporate tax system has advanced to the point that OECD blueprints may be ready for political agreement after the U.S. election. This session will cover the latest on the OECD's design towards a two-pillar solution to address the tax challenges of the digital economy, including: <ul style="list-style-type: none"> – Will it deliver on the G-20's mandate? – A truce through tough times, or will digital services taxes pile on? – How did we get here and should Australians care? 	Session 8B: What's attracting the ATO's attention in the SME space? Speakers: Kelly Canavan, Australian Taxation Office; Moira Merrick, CTA, Australian Taxation Office This session will focus on what issues are attracting the Commissioner's attention for private groups. It will be a practical session providing insights from recent ATO experience.	Session 8C: ATO's Smarter Data Program Speaker: Marek Rucinski, Australian Taxation Office The ATO is well known for its ability to access and use a wide range of data and analytical techniques to foster willing participation in the tax and super system. Big data is here and now, and opportunities to harness new technologies are burgeoning. Community and government expectations are driving demand for more personalised services, greater transparency and more intuitive and effortless client interactions. The ATO is on a transformational journey to become a truly data-driven, client-centric organisation. How will this impact on corporate taxpayers? And what changes can they expect as the ATO invests in growing its data and analytics capabilities and takes on the challenges and opportunities of big data in a rapidly evolving technological landscape?
11.15–11.30am	Delegate break		

“The line up for Victorian Tax Forum this year has something for everyone – from the sole tax practitioner to the largest corporate tax functions and everything in between. I am also excited about the mix of COVID-related and non-COVID related tax sessions.”

Dioni Perera, FTI, King & Wood Mallesons

Technical program

Week 3 – Thursday, 29 October 2020 continued

Time	Corporate stream	SME stream	Hot topics stream
11.30am–12.30pm	<p>Session 9A: Permanent Establishments in 2020 and beyond Speakers: Amber Agustin, FTI, Clayton Utz; Cameron Forbes, Clayton Utz</p> <p>The global expansion of multinationals which has been partly driven by the increased focus on electronic commerce in the digital era has resulted in an increased presence of multinationals and their personnel in Australia. Consequently, the existence of Australian 'permanent establishments' (PE) are a key focus area of the ATO. This presentation will provide a unique perspective examining recent trends and developments in this area from both a disputes and transactional perspective including:</p> <p>Disputes Context</p> <ul style="list-style-type: none"> – Strategies when engaging with the ATO on PE disputes; – Action that can be taken by taxpayers to support their PE position (including relevant evidence etc); <p>Transactional Context</p> <ul style="list-style-type: none"> – Australian PE issues related to: <ul style="list-style-type: none"> – The increased presence of personnel of non-residents in Australia (with a particular focus on secondment / non-secondment arrangements within corporate groups) – The impact of electronic commerce (including the use / location of computer equipment / servers in e-commerce and their relevance to the existence of a PE) – The temporary displacement of personnel of non-residents in Australia and the interruption of Australian construction sites due to COVID-19 	<p>Session 9B: Update on s 100A Speakers: Leo Gouzenfiter, Pitcher Partners; Alexis Kokkinos, ATI, Pitcher Partners</p> <p>It is now some years since the profession first sought much-needed guidance on the operation of s 100A of the ITAA 1936 about trust reimbursement agreements. The ATO has indicated that this continues to be 'advice under development' and targeted consultation is assisting the ATO prepare a draft ruling. However, in the meantime, this has not stopped the ATO seeking to apply s 100A in their compliance reviews. A lack of judicial and ATO guidance on the meaning of 'ordinary family or commercial dealings' and the 'tax purpose', coupled with an unlimited amendment period, continues to create uncertainty for taxpayers.</p> <p>The discussion will include:</p> <ul style="list-style-type: none"> – Current thinking and currently available guidance on s 100A – How taxpayers can navigate a path through the provisions while we wait for further clarification – Consideration of the applications of s 100A to examples dealing involving families and private business groups – Interaction of s 100A with other provisions such as Division 7A and the trust loss provisions 	<p>Session 9C: The Fair Work CoronaCoaster – Employment law risks for employers emerging from COVID-19 Speaker: Jasmine O'Brien, Sladen Legal</p> <p>As COVID-19 restrictions ease and businesses look to return to a new normal there are a number of risks business owners and advisors need to consider. This session explores some of the key employment law risks, including:</p> <ul style="list-style-type: none"> – Managing stand downs and redundancies – Temporary employment law protections for JK qualified employers end in September 2020 – how to manage these / what to be aware of – Managing leave entitlements – Implementing effective contractual variations – Directives to attend the office, travel and resume face-to-face meetings – Ongoing workplace health and safety obligations, including supporting employee well-being – Providing flexibility to accommodate vulnerable employees or employees caring for vulnerable people whilst pandemic still continues – avoiding discrimination, adverse action claims or breaches of FWA, awards and EAs; and – Keeping focused on ongoing issues of underpayments and 'wage theft'

Technical program

Week 4 – Thursday, 5 November 2020

Time	Corporate stream	SME stream	Hot topics stream
9.00-10.00am	<p>Session 10: Tax policy and advocacy update Speakers: Robyn Jacobson, CTA, The Tax Institute; Andrew Mills, CTA-Life, The Tax Institute</p> <p>As we emerge from the COVID-19 crisis, there has never been a more important time to turn our minds to genuine and earnest tax reform. In this engaging session, The Tax Institute's new Director of Tax Policy and Technical and our new Senior Advocate will explore the state of tax policy, the current activities of The Tax Institute's policy and advocacy strategy.</p> <p>The discussion will include:</p> <ul style="list-style-type: none"> – The Tax Institute's recent and ongoing advocacy activities – Driving tax reform – Unfinished business for corporates and SMEs 		
10.00-10.15am	Delegate break		
10.15-11.15am	<p>Session 11A: Corporate residency issues in light of COVID-19 Speaker: Dr. Julianne Jaques, CTA, Victorian Bar</p> <p>This session will consider the current state of play regarding Australian corporate tax residency including the Board of Taxation Corporate Tax Residency Review and the concessions available to foreign incorporated companies in light of travel restrictions due to COVID-19 related measures. The session will cover:</p> <ul style="list-style-type: none"> – Corporate residency case law and ATO guidance – Proposals for changes to corporate residency rules considered by the Board of Taxation – Implications for residency from COVID-related travel restrictions – Interaction of residence with double taxation treaties and implications of the Multilateral Instrument – Consequences of potential dual residence or migration of companies as a result of the corporate residency rules – Insight into the challenges facing foreign incorporated companies today – Options to manage tax risks and governance implications 	<p>Session 11B: SME cases update Speaker: Vincent Licciardi, HWL Ebsworth Lawyers</p> <p>This popular session will discuss and analyse the implications of selected recent court and tribunal decisions on issues that are of particular relevance to private groups and individuals, and is expected to include:</p> <ul style="list-style-type: none"> – CGT and small business CGT concessions – Division 7A – International tax issues – Superannuation and SMSFs – The Commissioner's administrative powers 	<p>Session 11C: Individual tax residency update Speakers: Kaitilin Lowdon, ATI, Arnold Bloch Leibler; Paul Sokolowski, CTA, Arnold Bloch Leibler</p> <p>While the COVID-19 crisis has significantly impacted global mobility, and may continue to do so for the foreseeable future, the tax residency of individuals has been a particularly hot topic in recent times. A number of significant legal decisions and a self-initiated review of these rules by The Board of Taxation have meant practitioners have had to remain vigilant and often reexamine client circumstances in light of the changing regulatory environment.</p> <p>The discussion will include:</p> <ul style="list-style-type: none"> – A recap of the current rules and how they apply in practice – Key legal decisions and the evolving judicial interpretation of residency concepts – The Board of Taxation review and current state of play – Impact of the COVID-19 crisis on the tax residency status of individuals – The Commissioner of Taxation's views
11.15-11.30am	Delegate break		

Technical program

Week 4 – Thursday, 5 November 2020 continued

Time	Corporate stream	SME stream	Hot topics stream
11.30am–12.30pm	<p>Session 12A: In house tax leaders facilitated discussion</p> <p>Panelists: Irene Filippone, Bluescope Steel Limited; Premila Roe, CTA, BHP; Cristina Wolters, CTA, Transurban</p> <p>Facilitator: Andrew Mills, CTA-Life, The Tax Institute</p> <p>This session will include a lively discussion amongst our panel of Australian corporate Heads of Tax. Our panellists will share their perspectives ‘from the inside’ on the current issues, challenges and opportunities facing corporate Australia from a tax perspective.</p>	<p>Session 12B: The current superannuation landscape</p> <p>Speaker: Liz Westover, FTI, Deloitte Private</p> <p>For years, self managed superannuation funds have been a preferred savings and investment vehicle for many Australians, offering concessional tax treatment, asset protection and control and flexibility in investment choices. As superannuation balances have taken a hammering during the COVID-19 crisis, continual legislative change and guidance means advisers need to be across the changes, trends and risks in holding significant wealth in an SMSF.</p> <p>In this crucial session for any SMSF adviser, Liz will discuss:</p> <ul style="list-style-type: none"> — The latest legislative changes and trends — Opportunities for high net wealth SMSF clients including related party transactions, estate planning and investment structuring — ATO focus and activity in superannuation as funds emerge from the COVID-19 crisis 	<p>Session 12C: R&D – where to now?</p> <p>Speaker: Sukvinder Heyer, Grant Thornton</p> <p>The tax treatment of R&D expenditure is in a state of uncertainty. In addition to a ramp up of R&D investigations over the last few years, the Government is also considering significant legislative reforms in this area. This session will focus on the key challenges faced by industry in relation to historical positions and the issues raised by the proposed reforms.</p>





Presenter profiles

Amber Agustin, FTI, is a Partner at Clayton Utz and leads the Melbourne Tax Practice. Amber specialises in revenue litigation and disputes, and has particular expertise in the areas of regulator powers, tax administration and legal professional privilege. She has conducted litigation in the Federal Court, the Administrative Appeals Tribunal, the state Supreme Courts and various state administrative appeal tribunals.

Kelly Canavan recently joined the Private Wealth area within the ATO as an Assistant Commissioner with responsibility for engagement and assurance teams in Box Hill, Docklands and Hobart. Having spent over 20 years in GST centric roles, Kelly has been responsible for leading GST legislative changes in the precious metals and building and construction industries. Kelly has over 29 years' experience in both the ATO and private sector in a broad range of roles including business management, tax technical and people leadership roles.

Mia Clarebrough is a barrister practising predominantly in tax law, administrative law, equity and trusts. Mia acts for both taxpayers and revenue authorities in State and Federal matters, advises on tax investigations, rulings and objections, through to tax litigation and alternative dispute resolution. Before being called to the Bar, Mia was a Senior Associate at Norton Rose Fulbright and, before that, worked in the corporate tax group at Deloitte. She has been recognised in Doyle's Guide as a recommended tax barrister and is a Senior Fellow of the Law Faculty at the University of Melbourne.

Enzo Coia, CTA, is a Tax Partner at Deloitte with more than 20 years' experience providing advice on Australian and international taxation matters. Enzo specialises in M&A, financing, capital management and dealing with revenue authorities. He leads Deloitte's power and utilities tax practice nationally.

Chris Ferguson is an Assistant Commissioner in the Public Groups & International area of the ATO and has responsibility for issues related to arrangements involving the migration of intangible assets. Chris also heads up the Operations area for the Docklands site where he leads the teams responsible for taxpayer engagement including audits, reviews, APAs and other assurance products.

Irene Filippone is the Vice President Tax at BlueScope Steel Limited, a role which oversees a global team across Australia, the United States and Asia Pacific. With over 24 years of tax experience, Irene's prior corporate roles included 5 years at Vicinity Centres as General Manager Tax and 8 years at Village Roadshow as Group Tax Counsel. Irene commenced her career at Arthur Andersen, with other chartered experience gained at Shaddick & Spence and PwC. Irene is a lawyer and Chartered Accountant, with a Masters of Laws from the University of Melbourne. Irene also served as Vice President and President of the Corporate Taxpayers Association.

Alan FitzGerald founded his advisory practice, Practice Connections Advisory in 2015, to meet the demand from accounting firms looking for independent input when faced with myriad of choices in the search

for compliance and specialist IT solutions. Following a successful career in the local and international tax and accounting software market, Alan specialises in assisting firms approach their decisions in choosing solutions from the seemingly endless array of tax and accounting products in the market by bridging the gap between current needs and what is most suitable for the future. Along with his advisory practice, Alan is the strategic market adviser for Taxlab launching into the Australian market this year. He is also the regional manager for the Swiss-based Otico software solution for CbCR (CountrybyCountryReporting).

Cameron Forbes is a Special Counsel in the Taxation practice in the Melbourne office of Clayton Utz where he advises on income tax, stamp duty, and GST in the context of large corporate transactions, including providing tax advice for some of the largest and most complex Australian corporate transactions in recent years. Cameron spent two years of his career working as an M&A lawyer, which gives him a nuanced understanding of – and invaluable insight into – the commercial realities of large-scale corporate transactions. Before joining Clayton Utz, Cameron worked at another top tier firm, and in the legal division of the State Revenue Office Victoria which, together with his strong links with the Australian Taxation Office, means he is well placed to liaise and negotiate with tax authorities. Cameron also holds Chartered Accountancy qualifications which he draws upon when advising on any tax issues that arise on commercial transactions.

James Gould is a senior analyst in Deloitte's Melbourne M&A Tax team, dealing with complex Australian and international M&A tax issues for private equity, managed funds, corporate and privately owned groups.

Leo Gouzenfiter is a Senior Manager in the National Tax team at Pitcher Partners. He focuses on a broad range of income tax issues that affect private clients and family groups in the SME market and regularly consults with the ATO and Treasury in his role. Leo commenced his career in the tax profession as a graduate in the ATO having worked in technical roles in the Tax Counsel Network and compliance roles in various business lines.

Graeme Halperin, CTA, of Halperin and Co, is a Barrister and Solicitor with over 30 years' experience specialising in taxation, trust, estate and commercial law with extensive experience in tax, trust, estate and commercial litigation and dispute resolution. He is a former Chairman of the Breakfast Club, State Convention and Education Committee of the Victorian branch of the Tax Institute, served two terms on the Victorian State Council, served on several Tax Institute technical committees and in 2013 received a Meritorious Service Award from the Tax Institute. He has written many articles on tax related topics and has been a regular Tax Institute presenter since the 1990s. He has contributed to Parliamentary Committees and media articles on a range of tax topics, made submissions to the ATO in relation to draft rulings and in 2018 was interviewed in a Four Corners expose on ATO practices.

Presenter profiles continued

Sukvinder Heyer has been advising in Research & Development (R&D) for over 20 years. Central to her approach is understanding your business and your needs related to the identification, preparation and support of your R&D claim. This includes timeliness of R&D tax compliance work whether you are a small company or large and supporting you through all phases of an ATO or AusIndustry review.

Frank Hinoporos, CTA, is a Partner in the tax group at Hall & Wilcox Lawyers. His clients include SMEs, high net worth individuals and families and not-for-profit entities. Frank is a member of the Law Institute of Victoria and a Chartered Tax Adviser with The Tax Institute.

Greg Hocking has enjoyed a real estate career spanning four decades. In 1985 he teamed with Andrew Stuart to commence Hocking Stuart a residential real estate agency based in the inner Melbourne suburb of Albert Park. With a passion for systems and process Greg as CEO and his talented team established a franchise network of 42 offices across metropolitan Melbourne and regional Victoria. Innovative marketing, structured training, technology, and a positive 'can do' culture were the hallmarks of Hocking Stuart's success. In 2007 Greg and Andrew wholly sold their business. Following a three year non compete Greg re entered the industry under his own name. This new venture has steadily grown into a 12 office franchise network across Melbourne. Greg is one of Melbourne's most recognised and respected names in real estate renowned for his leadership, innovation and work ethic.

John Ioannou, CTA, was admitted as a Solicitor in 2002 and is a Legal Practitioner Director of Deloitte Legal and a partner of Deloitte. He has experience in the areas of taxation, structuring, commercial transactions, disputes, trusts and estates, succession and asset protection planning. John has a Bachelor of Arts, Bachelor of Laws and a Master of Law. He is Chair of the Tax Institute's Queensland's State Council in addition to being a State Councillor.

Robyn Jacobson, CTA, is the Senior Advocate at The Tax Institute. She is well known in tax training circles, having been a professional tax trainer for 23 years and a regular conference and webinar presenter. With nearly three decades in the profession, Robyn's public practice background preceded her training roles with Webb Martin, her own business, Cyntax, and TaxBanter. Robyn is a Fellow of both CA ANZ and CPA Australia, and a Registered Tax Agent. Robyn regularly consults with The Treasury, the ATO and the professional bodies on technical issues including as a member of the ATO's Tax Practitioner Stewardship Group. Robyn is an avid advocate, social media commentator, columnist, blogger and podcaster and is regularly quoted in the media. Robyn was recognised in the Women In Finance Awards 2019 as the Winner of *Thought Leader of the Year* and was named in the global *Top 50 Women in Accounting 2019*. She was recently recognised in the Australian Accounting Awards 2020 as the Winner of both *Thought Leader of the Year* and the *Accountants Daily Excellence Award*.

Dr Julianne Jaques, CTA, is a barrister specialising in taxation law. She has particular expertise in disputes involving complex commercial transactions and was counsel for the Commissioner in the Bywater matter in the High Court concerning corporate residency. Prior to coming to the Bar, Julianne spent 10 years in private practice with a major law firm and a major accounting firm. She is a Chartered Tax Adviser and a Chartered Accountant, and her doctoral thesis at the University of Melbourne was on the taxation of corporates. Julianne is a member of the Tax Practitioners Board and the Board of Taxation. In March 2020, Julianne was awarded Chartered Tax Adviser of the Year.

Ron Jorgensen, CTA, principally consults on Commonwealth and State tax laws, tax dispute resolution and compliance enforcement. Ron specialises in trusts and trust disputes, succession and asset protection, business and investment structuring and tax sensitive commercial and property transactions. Ron is an Accredited Specialist Tax Law and member of the Tax Law Advisory Committee with the Law Institute of Victoria. He is a member of the Law Institute of Victoria and The Tax Institute. Ron is a member of the Tax Technical Committee (Vic), a member and former chair of the States Taxes Committee (Vic) and former representative of the Victorian State Taxes Consultative Council for The Tax Institute. Ron is a member of the Property Council of Australia Tax Committee (Victorian Division). Ron was recognised by Doyle's Guide as a Recommended Tax Lawyer for

2015, 2016, 2017 and 2018 and as a Leading Tax Lawyer for 2020 and in Best Lawyers Australia 2021.

Fiona Knight, CTA, is an Assistant Commissioner at the ATO. She has over 20 years experience in taxation law and administration. Fiona currently works in the Tax Counsel Network providing advice on the most complex technical issues in audit, litigation and legislative development with a focus on anti-avoidance provisions. She is a member of the ATO's General Anti-Avoidance Rules (GAAR) Panel and has previously worked in the Large Business & International and Litigation areas of the ATO.

Alexis Kokkinos, ATI, is a Partner of the Tax Consulting group of Pitcher Partners and has over 19 years experience in advising corporate clients. Alexis was a member of the Board of Taxation review on the tax consolidation measures and was also a member of the Treasury review of MEC groups.

Vincent Licciardi is a Special Counsel at HWL Ebsworth and has over 15 years' experience in taxation, with a particular focus on tax structuring and disputes faced by small to medium private businesses, wealthy family groups and high net worth individuals. Prior to joining HWL Ebsworth, Vincent worked for the ATO as a Director in its Private Groups & High Wealth Individuals division (now called Private Wealth). Vincent has acted both for and against the ATO in all forms of tax disputes, including Top 500 reviews, Black Economy Taskforce and Tax Avoidance Taskforce disputes.

Presenter profiles continued

Kaitilin Lowdon, ATI, is a Senior Associate in the market-leading taxation practice of Arnold Bloch Leibler. Kaitilin has acted on a variety of high-profile and complex tax audits and disputes with the ATO, advising clients on all stages of the dispute process, including negotiation outcomes with the ATO. Kaitilin advises a range of clients, including high net wealth individuals, some of Australia's largest family groups and public companies.

Moira Merrick, CTA, is the Director & Technical Leader for the Victorian Case & Technical Leadership group in the Private Wealth sector at the ATO. Immediately preceding this role, Moira was the Regional Director for Victoria and Tasmania for the Technical Excellence Services group responsible for providing technical advice in the form of Private Binding Rulings, Class Rulings and Product Rulings within the former Private Groups and High Wealth Individuals business line. Prior to joining the ATO in 2017, Moira was part of Deloitte's Tax Insights & Policy group and has extensive experience providing specialist tax advice to both large corporates and closely held groups.

Andrew Mills, CTA (Life), is the Director, Tax Policy and Technical at the Tax Institute, a Senior Fellow at Melbourne University Law School and a member of the Tax and Transfer Policy Institute Advisory Board. Previously, Andrew was the Second Commissioner, Law Design & Practice, at the Australian Taxation Office from 2013 - 2019. Andrew has 40 years' experience in taxation,

including periods in the ATO, commerce and the tax profession. Andrew was a Director at Greenwoods & Freehills for more than 20 years and managing director of the firm from 2006 to 2011. Andrew was President of The Tax Institute in 2006-2007 and is a former Governor of the Taxation Research Foundation. In practice, Andrew was an active participant and representative of a number of industry bodies and a lecturer in the taxation in the Masters program at Sydney Law School. Andrew holds a Bachelor of Business, a Master of Laws and a Graduate Diploma in Tax Law. Andrew is a Chartered Taxation Adviser (Life), a member of the Australian Executive Committee of the International Fiscal Association and a graduate of the Australian Institute of Company Directors.

Jasmine O'Brien is the Principal of Sladen Legal's Employment Law team. Jasmine practises across all areas of employment law, industrial relations, and discrimination, harassment and bullying. Jasmine prides herself on the strength of her client relationships. She believes that lawyers need to be customer-centric problem solvers who partner with business to achieve their commercial objectives. She's not afraid to do things differently and loves getting results for her clients. She understands that every business was once somebody's dream and brings that awareness to her work.

James O'Halloran currently has national responsibility for the JobKeeper Payment Program that was initiated

by the Government in response to the COVID-19 pandemic. At various times prior to his current role James has had Deputy Commissioner roles across Superannuation, Indirect Tax and Tax Practitioner Services. Prior to joining the ATO, James held senior management positions in state government agencies in Victoria. James has a Bachelor of Arts (Justice Administration), a Master of Corporate Law.

Frank O'Loughlin QC, CTA, has been a practising barrister and member of the Victorian Bar since 2003 practising principally in taxation and commercial law and is also a Senior Fellow of the Law Faculty of the University of Melbourne and a part time Deputy President of the Commonwealth Administrative Appeals Tribunal. Before joining the Bar Frank practised as a solicitor with Corrs Chambers Westgarth, from 1987 to 2003, becoming a partner in 1994 and later a National Practice Group Leader and a Board Member. His practice was principally in the taxation and corporate finance and commercial law fields. Before Corrs Frank worked for 12 years with the Australian Taxation Office in various branches.

Andrew Orme is the ATO's Deputy Chief Tax Counsel responsible for Public Advice and Guidance. Prior to taking up that role, Andrew held a number of positions within the ATO, including as Assistant Commissioner for independent review and large market objections, and as an Assistant Commissioner in the Tax Counsel Network.

Prior to joining the ATO, Andrew worked as a Senior Associate at Clayton Utz and a policy analyst at Treasury.

Dioni Perera, FTI, specialises in tax advisory and tax disputes at King & Wood Mallesons. She acts for a wide range of clients across a range of tax issues, most recently including transfer pricing, R&D, Part IVA and capital/revenue issues. She has significant experience in negotiating with the ATO, other regulators and various stakeholders, and has advised a number of clients in settling their disputes with the Commissioner. She has run a number of cases at first instance and on appeal and advised clients on the Part IVC process and related debt recovery proceedings, legal professional privilege, FOI issues and the gathering of evidence for litigation.

David Plank is head of the Australian Economics team for ANZ. This group takes responsibility for forming ANZ's view on the outlook for the Australian economy and advising clients of such. David also has responsibility for the Australian fixed income strategy team. Prior to joining ANZ, David was head of Deutsche Bank's Australia/NZ macro research and strategy for more than ten years. For the last five of these years he was also head of Fixed Income and Credit Research for the Asia-Pacific region. David has worked for the New Zealand Treasury, in funds management, was Chief Economist for Bankers Trust New Zealand in the mid-90s and has degrees in economics from the University of Canterbury and University of California, Los Angeles.

Presenter profiles continued

Premila Roe, CTA, is currently the Global Head of Tax at BHP. Premila has over 25 years of tax experience and was previously the Head of Tax at Optus and, prior to this, the Head of Tax at AGL. She commenced her career with the ATO before leaving to join Deloitte. She has a Bachelor of Laws and a Masters in Tax Law and is a Chartered Tax Adviser.

Marek Rucinski is the Deputy Commissioner for Smarter Data Program for the ATO and has a strategic responsibility for development and industrialisation of data, analytics and insights, strategic, legislative agenda and value for ATO. Marek has taken part in and driven the evolution of data and analytics capabilities for over 20 years. This has been done in industry roles and in a consulting services capacity, across Australia, Asia and global clients, across the retail, telco, consumer goods, financial services, mining and utilities sectors and now the federal government. Prior to ATO, Marek was a Managing Director in Accenture and was the lead for Analytics Practice for Australia and New Zealand.

Shashi Sivayoganathan is the General Counsel, Tax at Transurban. He is also a consultant with Deloitte (retired Partner). He has over 20 years of tax experience, specialising in infrastructure, merger and acquisitions, privatisations, project finance and tax consolidations. Shashi has significant experience in public/private investment in infrastructure and greenfield infrastructure projects. In addition to his experience in infrastructure, Shashi also has extensive experience in tax audits and tax litigation.

Paul Sokolowski, CTA, is a partner at Arnold Bloch Leibler, and is the national leader of the firm's taxation practice. Paul advises clients, including high-net-worth individuals, large private groups and public entities in tax reviews, audits, disputes and litigation, and in domestic and international transactions. Paul is a regular speaker and writer for the Tax Institute, and other organisations and publications. He actively contributes to tax policy, legislative, technical and administrative development and debate. In March 2019, Paul won The Tax Institute's 2019 Chartered Tax Advisor of the Year Award.

The Hon Michael Sukkar MP was first elected to the Australian Parliament in 2013 as the Member for Deakin. In May 2019, he was sworn in as the Minister for Housing and Assistant Treasurer having previously served as the Assistant Minister to the Treasurer since 2017. Michael has a Bachelor of Laws and Bachelor of Commerce from Deakin University and a Master of Laws from the University of Melbourne. Prior to entering the Parliament, Michael spent seven years working as a lawyer with the firm Ashurst Australia (then known as Blake Dawson Waldron), where he was a Senior Associate. In this role, he advised many of Australia's most successful individuals and largest corporate groups. Before then he worked as a Senior Consultant with accounting firm PricewaterhouseCoopers where he also specialised in tax. Michael has previously served on a number of parliamentary committees, including as Chair of the Parliamentary *Joint Committee on Intelligence & Security*, as well as *Chair of Parliamentary Joint committee*

on Corporations and Financial Services. Michael is married to Anna and they have two children.

Jayde Thompson is a Partner in PwC's Global Tax Practice with over 10 years experience as a corporate tax adviser, specialising in international tax, M&A, cross-border related party arrangements and tax policy considerations. Jayde spent two years in New York advising US multinational companies and has also worked with the Board of Taxation on various policy considerations such as the recently legislated hybrid mismatch rules.

Chris Vittas is a partner in the Tax Advisory division of the PKF Melbourne office. He has over 20 years' experience in professional services, including 12 years as a Taxation Services partner. Chris specialises in minimising clients' risks by providing strategic planning advice on indirect taxes. He is actively involved in indirect tax controversy matters and dispute resolutions, and has been involved in assisting and managing several GST and R&D cases. Chris has vast knowledge in the property and manufacturing industry, facilitating his clients with specialist advice on matters such as research and development tax incentive, stamp (transfer) duties, GST, land tax and foreign purchasers matters.

Greg Weickhardt is a PwC Global Tax Partner specialising in advising multinational businesses, with a focus on aligning tax and transfer pricing arrangements with business operating models. Greg has previously worked in Europe, Asia and the Americas.

Most recently Greg has been working with multinational companies to navigate the consequences of competing interpretations of the arm's length principle within the digital economy.

Cressida Wall is the Victorian Executive Director of the Property Council of Australia. Representing over 550 business state wide and over 300,000 employees, the Property Council is the peak industry body for property and property affiliated businesses Australia wide. With extensive experience in senior leadership roles across a variety of sectors, including property, public policy, corporate affairs, infrastructure, private equity and technology startups. Cressida has been a Board member of the Office of Projects Victoria, and prior to that spent five years as a key economic adviser to the Bracks and Brumby Governments. Since joining the Property Council in November 2018, Cressida regularly represents the property industry across print media, radio and television.

Len Warson is the CEO of Glenvill. Although Len has a finance background, he is a creative at heart. His career started at Ernst and Young in a range of roles, culminating as the Supervisor of the Insolvency Division. In 1984 Len made the shift to join his family's homebuilding business, Glenvill, which was in a downturn at the time. In his capacity as General Manager, he went about overhauling everything from operations to sales, before being appointed as CEO. Under his strategic leadership, Glenvill was restructured, rebranded and grew to encompass four specialised, market-leading businesses within the newly formed Glenvill Group. Still taking a

Presenter profiles continued

hands-on approach, Len puts his self-taught architect and interior designer skills to use, as well as acting as the Creative Director for the group's renowned YarraBend development. Guided by the philosophy "Never Ordinary", Len's focus on innovation and challenging the status quo has seen the Glenville Group go from strength-to-strength, all the while delivering exceptional homes.

Liz Westover, FTI, is a Partner and the National Lead for SMSFs at Deloitte Australia. She is responsible for the success of the firm's SMSF service offering, providing compliance and consulting services to the firm's clients. Liz has extensive experience in superannuation, having previously held positions at PwC and as Head of Superannuation at Chartered Accountants Australia and New Zealand. She has strong capabilities on the technical application of superannuation and associated tax laws. She is a regular commentator on superannuation issues with mainstream and social media, and has authored blogs and articles on superannuation and related issues for many years. Liz has been heavily involved in superannuation policy development and advocacy, regularly liaising and consulting with government, regulators and stakeholders on technical, legislative and policy matters. She is a Fellow of Chartered Accountants Australia and New Zealand, SMSF specialist and holds a Master of Legal Studies from the University of New South Wales and a Bachelor of Business from the University of South Australia.

Mark Wizel worked with CBRE in its Melbourne office for 13 years. In his time he together with his team amassed close to

\$15BN in commercial property sales. Mark is a specialist in the identification and facilitation of commercial property transactions to capital stemming from different parts of Asia. In his time as a commercial property agent he represented some of the industries most well known players including Hudson Conway, Beck Property Group, MAB Corporation, Melbourne University and Telstra. In May 2020 Mark and CBRE ended their relationship with Mark now focusing on building his new entity, Wizel Property Group.

Cristina Wolters, CTA, is the General Manager Taxation at Transurban Limited, a triple stapled group with toll road operations in Australia, the United States and Canada. Cristina joined Transurban in 2006 to implement their tax function and has since overseen the tax structuring of Transurban's various acquisitions and capital raisings both in Australia and in the United States. She is a Chartered Accountant, a Graduate member of the Australian Institute of Company Directors, has a Master of Taxation from the University of Melbourne and is undertaking a Senior Executive MBA with the Melbourne Business School. Prior to joining Transurban, she was a tax adviser with PwC working in Australia and then in Brazil.

Nathan Yii, CTA, is the Principal Lawyer, a Chartered Tax Adviser and an accredited SMSF Specialist Advisor™ of the Melbourne-based legal practice, Nathan Yii Lawyers. He is a graduate of Melbourne Law School and holds a Bachelor of Commerce (Accounting), a Bachelor of Laws (Hons) and a Master of Laws. Nathan is recognised in Doyle's Guide

as a leading lawyer - a Preeminent Wills, Estates & Succession Planning Lawyer and a Recommended Wills & Estates Litigation Lawyer in Victoria.

Nathan takes a strategic approach to legal practice and focuses on tax-effective solutions, estate planning, asset protection, SMSF compliance and trusts, estates and SMSF disputes. He works with and consults to high net worth individuals, family offices, legal and non-legal professionals and their clients.

Nathan is a regular presenter in his areas of interest and expertise, and regularly presents for organisations and practitioner discussion groups throughout Australia. He is also an adjunct lecturer and advisory committee board member for the Estate Planning Practice specialisation in the Master of Laws program at the College of Law. Nathan was awarded The Tax Institute's national Dux Award for CTA3 Advisory and the prestigious Justice Graham Hill Scholarship in 2017. Nathan has also been appointed as a member of the Education Quality Assurance Board at The Tax Institute.



Event information

Registration options and inclusions

	Online access to presentations and technical papers	Attendance at live webinars and access to on-demand recordings post event	How to register
A Individual registration This registration option entitles one delegate to attend the event. Please see the registration form for the individual registration package options.	✓	✓	Register online or complete the form included in this brochure.
B Corporate registration This registration option allows you to register unlimited attendees from the same organisation by bundling a group of single sessions.	✓	✓	To purchase this ticket type, email britneymcivain@taxinstitute.com.au .

 **Register online at** taxinstitute.com.au/victaxforum

Webinars

Webinar login information will be sent to you 1-2 business days prior to the live event.

Choose a format that suits

- Attend the live webinars to interact with our expert presenters; or
- Reply the webinars (post event) at a time that suits you.

You can register for sessions in the same time slot, but you will only be able to attend one live session. You will be able to watch the recording for the concurrent session.

Delegate list

A delegate list will be included in The Tax Institute CPD app to assist with networking. Please indicate on the registration form if you do not want your details included on the list.

Paperless materials

The Tax Institute understands the impact that an event of this nature has on the environment, especially when printing

delegate materials. Full technical papers and PowerPoint presentations will be available online only to all participating delegates approximately five days before the event. Once these are available, an email will be sent to delegates with access details.

The Tax Institute CPD app

Program information, materials (technical papers and slides), evaluation forms and more will be available via The Tax Institute's event app. All delegates are encouraged to download the app on their phone or tablet prior to the event. Materials will be made available for download approximately five days before the event. At this time, an email will be sent to delegates with access details.

Changing or transferring sessions

Attendance at the forum is fully transferable. Replacements can be nominated at any time; however, please email ALL changes to vic@taxinstitute.com.au to ensure that your data is updated, webinar login information is correct and CPD hours are

allocated to the correct attendee. If your changes are received more than three working days prior to the commencement of the forum, a revised confirmation letter will be sent.

Note: There may be an additional cost depending on the member status of the registered attendee and the replacement.

Alteration and cancellation policy

The Tax Institute reserves the right to alter, amend or cancel all or any of the arrangements contained in the program. It is a condition of acceptance of registration that an administration fee of 20% of the registration fee will be charged for cancellation. No refund will be given for cancellations received within five working days of the event. A replacement may be nominated; however, the replacement is only valid for the VIC 8th Annual Tax Forum Online. 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.

Confirmation of registration

A confirmation will be sent via email. Please note you will receive two separate emails in the form of a confirmation email and tax invoice.

CPD accreditation

Full registration attendance counts for 12 hours of Structured Continuing Professional Development (CPD) Accreditation with The Tax Institute.

For further information regarding this event, please contact the Victorian team on 03 9603 2000 or email vic@taxinstitute.com.au

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

Event Registration form

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

1 Registration

A Individual registration

	Member	Non-member
Full registration (12 CPD hours) <small>Select 12 sessions*</small>	<input type="checkbox"/> \$660	<input type="checkbox"/> \$860
Six pack (6 CPD hours) <small>Select 6 sessions*</small>	<input type="checkbox"/> \$390	<input type="checkbox"/> \$510
Single session (1 CPD hour)	<input type="checkbox"/> \$75	<input type="checkbox"/> \$95

*Please select the session you wish to attend on the following page in section 3 of this form.

☐ I acknowledge that I will receive electronic access to the available papers and presentations through The Tax Institute CPD app.

B Corporate registration

Purchasing more than 30 individual sessions? Tailor a corporate package to save on your bulk registration.

This registration option allows you to register unlimited attendees from the same organisation by bundling a group of single sessions. Please see the table below for the corporate registration discounts available.

To complete a corporate registration or for more information, please contact britneymcilver@taxinstitute.com.au

Corporate package	Discount
30 – 49 sessions	20% off total (based on single session pricing)
50+ sessions	30% off total (based on single session pricing)

*All attendees of the corporate registrations must be from the same firm. Corporate registrations must be completed at same time with the same payment details.

2 Delegate contact details

Member no.:

If your member details are up-to-date, you can skip this section.

Title: ☐ Mr ☐ Mrs ☐ Miss ☐ Ms

Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb:

State:

Postcode:

Telephone:

Mobile:

Email:

☐ Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking purposes.

3 Technical sessions options

Week 1: Thursday, 15 October 2020

- 9.00–10.00am ☐ Session 1: Keynote address from the Hon Michael Sukkar MP
- 10.15–11.15am ☐ Session 2A: M&A and Coronavirus: a crown of thorns
☐ Session 2B: 2020-21 Budget update: What's hot?
☐ Session 2C: Property panel
- 11.30am–12.30pm ☐ Session 3A: Capital or Revenue – Implications of the counterfactual
☐ Session 3B: Tax effective resolution of trust and estate disputes: making the best of a bad situation
☐ Session 3C: Tax conflict management

Week 2: Thursday, 22 October 2020

- 9.00–10.00am ☐ Session 4: Update on COVID-19 Stimulus Measures
- 10.15–11.15am ☐ Session 5A: General ATO updates for corporates
☐ Session 5B: Div 7A – Emerging from COVID-19
☐ Session 5C: Embracing technology
- 11.30am–12.30pm ☐ Session 6A: Legal Professional Privilege
☐ Session 6B: Dealing with the fallout of COVID-19
☐ Session 6C: GST – Legal considerations for property developers

Week 3: Thursday, 29 October 2020

- 9.00–10.00am ☐ Session 7: Economic impact on the Budget from COVID-19
- 10.15–11.15am ☐ Session 8A: Seat 1A on the Digital Tax plane: chasing source – or chaos?
☐ Session 8B: What's attracting the ATO's attention in the SME space?
☐ Session 8C: ATO's Smarter Data Program
- 11.30am–12.30pm ☐ Session 9A: Permanent Establishments in 2020 and beyond
☐ Session 9B: Update on 100A
☐ Session 9C: The Fair Work RonaCoaster – Employment Law risks for employers emerging from COVID-19

Week 4: Thursday, 5 November 2020

- 9.00–10.00am ☐ Session 10: Tax Policy and Advocacy update
- 10.15–11.15am ☐ Session 11A: Corporate Residency issues in light of COVID-19
☐ Session 11B: SME Cases update
☐ Session 11C: Individual Tax Residency Update
- 11.30am–12.30pm ☐ Session 12A: In house tax leaders facilitated discussion
☐ Session 12B: The current Superannuation landscape
☐ Session 12C: R&D – where to now?

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.

4 Payment method

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

☐ **Cheque payable to The Tax Institute** (in Australian dollars)

☐ **Credit card** Card type: ☐ AMEX ☐ Visa ☐ MasterCard ☐ Diners

Name on card:

Card no.:

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Cardholder's signature:

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

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- ☐ I am interested in becoming a member of The Tax Institute. Please send me further details.
- ☐ I am interested in learning more about The Tax Institute's education program. Please contact me.

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THE TAX INSTITUTE

L37, 100 Miller Street
North Sydney NSW 2060

Tel 02 8223 0000
Fax 02 8223 0077

For information, please contact Vic team
at vic@taxinstitute.com.au

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Thank you

The Tax Institute gratefully acknowledges the generous assistance of the VIC 8th Annual Tax Forum Online Organising Committee:

Aaron Fitchett, CTA, Baumgartners (Chair, VIC 8th Annual
Tax Forum Online Organising Committee)

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Nikol Davies, KPMG

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Matthew Meng, Victorian Bar

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Adrian Zuccarini, FTI, Australian Taxation Office