



THE TAX INSTITUTE



# 2021 Financial Services Taxation Conference

22–23 April 2021 | Crown, Sydney

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11 CPD hours



# Welcome

On behalf of The Tax Institute and the 2021 Financial Services Taxation Conference Organising Committee, it gives me great pleasure to invite you to Australia's leading financial services tax conference.

Nobody could have predicted the journey we've been on since we all met in Melbourne in February last year! As we look ahead with increasing optimism for 2021 and beyond, the Committee has strived to create a thought provoking program which will explore key tax issues that have emerged over the last 12 months as well as the economic and tax policy settings for the post-COVID era to come.

While we all live with the continuing unpredictability of COVID restrictions across Australia, the 2021 event will be delivered in a hybrid format to afford you the opportunity to learn in the most convenient way possible. Whether you are watching from the brand new conference space in Crown Sydney or viewing from the comfort of your home or office, you will experience the same excellent program.

As is always the case, we have secured a great range of leading experts and thought leaders to deliver a choice of sessions to best fit your needs.

Please register early to confirm your place and enjoy this year's event.



**Matthew Hartshorn, CTA**  
Chair, 2021 Financial Services Taxation Conference

## Thank you

The Tax Institute gratefully acknowledges the generous assistance of members of the Financial Services Taxation Conference Organising Committee:

**Matthew Hartshorn, CTA**, Macquarie Group  
(Chair, Conference Organising Committee)

**Siew-Kee Chen, CTA**, Deloitte

**Rob Colquhoun**, AFMA

**Joanne Dunne, CTA**

**Andrew Hirst, CTA**, Greenwoods &  
Herbert Smith Freehills

**Jason King, CTA**

**Paul McLean, CTA**, EY

**Peter Nearhos, CTA**, QIC

**Matt Osmond, CTA**, PwC

**Natalie Raju**, KPMG

**Brett Zimmermann**, Australian Taxation Office

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## Early bird offer

*Register on or before 26 March 2021 to save*

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Sponsored by:  Wolters Kluwer



# Technical program

Day 1 – Thursday, 22 April 2021

Time	Session	Presenter(s)
8.00–8.30am	Registration	
8.30–8.45am	Opening address and President's welcome	Peter Godber, CTA President The Tax Institute
8.45–9.30am	<b>Session 1: Keynote address – Tax policy</b> This session will examine the role that tax reform will play on Australia's economic recovery from the COVID-19 Pandemic. Noting that Australia's financial system has continued to function effectively during the pandemic, the session will further consider specific reform proposals that will allow banking and financial services participants to maintain and enhance their competitiveness in the face of increasing competition from other jurisdictions. The session will consider previous reform proposals/packages and the extent to which these remain fit for purpose in the current environment.	Senator Andrew Bragg and Andrew Mills, CTA, (Life) The Tax Institute
9.30–10.30am	<b>Session 2: Economic outlook</b> Observations on the outlook for the Australian and global economies post COVID-19 and implications for financial services.	Danielle Wood Grattan Institute
10.30–11.00am	Morning tea	
11.00am–12.00pm	<b>Session 3A: The new principal purpose test in anti-avoidance rules</b> As a result of the BEPS project and because of specific integrity concerns, Australia has enacted integrity rules which establish a different purpose test to that in Part IVA, the principal purpose test.  In this session Jennifer Batrouney AM QC, will consider those rules – particularly in the multilateral instrument, the diverted profits tax, and the hybrids integrity rule. She will consider: <ul style="list-style-type: none"> <li>– the context and background to those rules and their significance to the financial services industry</li> <li>– the difference between the principal purpose test and Part IVA</li> <li>– the ATO's published approach to the principal purpose test and</li> <li>– how a Court may approach a case requiring it to assess the principal purpose test</li> </ul>	Jennifer Batrouney AM QC Victorian Bar
	<b>Session 3B: M&amp;A in financial services</b> The last few years have seen an unprecedented level of M&A activity in the financial services industry with significant disposals, acquisitions and consolidations taking place. In recent times, we have seen an increased focus on multi-national private equity funds seeking to establish a foothold in the Australian marketplace. This session will focus on some of the key tax issues arising in relation to this activity from both sell and buy side including consolidation issues (both exit and entry), recognition of goodwill as an asset, joint venture structures, SFTs and recognising the position of policyholders.	Martin Wiesinger, ATI AMP Australia Ethan Zuo, CTA KPMG

“I've been a regular attendee at the Financial Services Taxation Conference over many years. The conference always provides insights, updates and perspectives from a variety of presenters on a range of topics that are relevant to the financial services sector. It also offers up some fun and the opportunity to catch up with peers and make some new connections.”

Matt Osmond, CTA, PwC

# Technical program continued

## Day 1 – Thursday, 22 April 2021 continued

Time	Session	Presenter
12.00–1.00pm	<p><b>Session 4A: Loan variations and bad debts</b></p> <p>With a significant increase in loan variations to support customer hardship cases and an expected increase in credit losses, this session will focus on some key issues for businesses that lend money to customers.</p> <p>It will cover:</p> <ul style="list-style-type: none"> <li>— The different income tax rules that apply to loans</li> <li>— How loan variations are treated for income tax purposes</li> <li>— When bad debt deductions arise for tax purposes</li> <li>— The integrity rules for claiming bad debt deductions for companies and trusts</li> <li>— Other relevant considerations</li> </ul> <p>The session will examine various case studies and contrast some different lending entity structures, including corporate vehicles, credit funds and securitisation trusts.</p>	<p><b>Raffaella Malkoun</b> PwC</p> <p><b>Matt Osmond, CTA</b> PwC</p>
	<p><b>Session 4B: Panel discussion on the automatic exchange of information (AEOL) reporting</b></p> <p>Following implementation of the Common Reporting Standard (CRS), Australian financial institutions (across banking, investment management and insurance sectors) reported 5.9 million accounts totalling over \$208 billion held by account holders (or controlling persons) tax resident in 247 jurisdictions for the 2018 calendar year.</p> <p>CRS has now shifted from implementation to tax authority reviews and further evolution of the rules. This session will discuss:</p> <ul style="list-style-type: none"> <li>— Current issues and challenges facing financial institutions for CRS and the Foreign Account Tax Compliance Act</li> <li>— The compliance approach of the ATO and other tax authorities across the globe</li> <li>— Future developments for AEOL regimes and what this means for Australian financial institutions</li> </ul>	<p><b>Jaydon Beatty</b> Australian Taxation Office</p> <p><b>David Honybun</b> Australian Taxation Office</p> <p><b>Alison Noble, ATI</b> Deloitte</p> <p><b>Terence Tan, CTA</b> Deloitte</p>
1.00–2.00pm	<b>Lunch</b>	
2.00–3.00pm	<p><b>Session 5A: Retirement income and the role of the tax system</b></p> <p>As the baby boomer generation continue to retire in an environment of low interest rates and increasing life span, retirement income systems around the world continue to come under stress. In Australia, the Federal Government commissioned an independent Retirement Income Review to investigate these and other aspects of the Australian retirement income system. The Review's Final Report was released in November 2020. This session will:</p> <ul style="list-style-type: none"> <li>— Outline the key findings of the Retirement Income Review</li> <li>— Discuss the fact base developed in the report and how the three pillars of the retirement system, the Age Pension, compulsory superannuation and private savings (including home ownership), interact with the broader tax and transfer system, to assist with maintaining living standards in retirement</li> </ul>	<p><b>Deborah Ralston</b> Member RBA Payments System Board; NED SuperEd, Kaplan; Professorial Fellow Monash</p>
	<p><b>Session 5B: The current interest rate environment</b></p> <p>Central banks and prudential regulators across the globe are calling for banks to demonstrate their readiness for negative interest rates. The current interest rate environment has significant implications for all tiers of funding from wholesale funding markets to retail deposits. In this session we will explore the associated tax implications, including:</p> <ul style="list-style-type: none"> <li>— The shift in the fundamental principles underpinning the taxation of interest and funding costs more generally (including withholding tax, and principles of assessability and deductibility);</li> <li>— The shift away from reliance on Part IIIB by the foreign bank branches and the impact on well-known issues such as liquidity charges and branch attribution more broadly;</li> <li>— The associated thin capitalisation implications;</li> <li>— The impact of other slated changes in funding markets such as the removal of LIBOR and impact on Part IIIB.</li> </ul>	<p><b>Julian Humphrey, CTA</b> KPMG</p>

# Technical program continued

## Day 1 – Thursday, 22 April 2021 continued

Time	Session	Presenter
3.00–3.30pm	Afternoon tea	
3.30–4.30pm	<b>Session 6A: ATO review of Managed Investment Trusts and superannuation funds</b> This panel discussion will provide an update on the current areas of ATO focus for Managed Investment Trusts and Superannuation funds, including: <ul style="list-style-type: none"> <li>— Top 1000 assurance program: Key findings and observations for MITs/AMITs and superannuation funds</li> <li>— Third party data: ATO and industry perspectives</li> <li>— What is next for the market: "Next Actions" program for superannuation funds and MITs/AMITs</li> </ul>	<b>Nadia Alfonsi</b> Australian Taxation Office  <b>Meghan Speers</b> Deloitte  <b>Facilitator:</b> <b>Siew-Kee Chen, CTA</b> Deloitte
	<b>Session 6B: Securitisation</b> Securitisation remains a key feature of financial institutions' commercial strategy in Australia and globally. It can also arise in infrastructure deals and private debt markets.  This session will provide: <ul style="list-style-type: none"> <li>— An overview of what is necessary to achieve an effective securitisation at law, including the structure of a "typical" securitisation and counterparties and the nature of the assignment</li> <li>— The tax implications arising from securitisation arrangements in different circumstances, including tax consolidation, the thin capitalisation SPV exemption, interest withholding tax (including s128F) and TOFA</li> <li>— Tricks and traps when entering into securitisation arrangements, including trust deed drafting (particularly in a stand-alone context)</li> <li>— Recent developments, including the AOFM forbearance structure and its challenges</li> </ul>	<b>Scott Heezen</b> King & Wood Mallesons  <b>Joanne Langford</b> King & Wood Mallesons
4.30–5.30pm	<b>Session 7: International policy – OECD; Pillar 1 and 2; European stimulus</b> In this Session, David Bradbury from the OECD will provide an update on the OECD's Pillar 1 and Pillar 2 program, with potential implications for participants in the Australian financial services industry. This will include: <ul style="list-style-type: none"> <li>— The scope of digital services for the purpose of determining whether the Pillar 1 measures could potentially apply</li> <li>— The methodology to determine the minimum rate of tax under Pillar 2 and the likely rate to apply for Pillar 2 purposes</li> <li>— The effect of the Pillar 2 proposals on the determination of what may be considered appropriate tax competition</li> </ul>	<b>David Bradbury</b> Organisation for Economic Co-operation and Development  <b>Facilitator:</b> <b>Rob Colquhoun, ATI</b> AFMA
5.30–7.30pm	Wolters Kluwer Cocktail Function, A'Mare, Crown Sydney	

## Wolters Kluwer Networking Function – Thursday, 22 April 2021 – A'Mare, Crown Sydney

After a full day of technical toil, we'll be inviting delegates to enjoy some delectable canapes and drinks whilst reconnecting after a whirlwind 12 months. This is your opportunity to network and exchange ideas with colleagues, peers, and our esteemed presenters.

**Time:** 5.30–7.30pm  
**Price:** Included for full registration delegates  
**Dress:** Business or business casual

# Technical program continued

## Day 2 – Friday, 23 April 2021

Time	Session	Presenter
9.00–10.00am	<b>Session 8 Keynote: Australia's transfer pricing landscape</b> The Full Federal Court decision in <i>Glencore Investments</i> in November 2020, combined with developments such as the OECD's BEPS project and ATO practical compliance guidelines, have underlined the importance of transfer pricing management to the compliance and governance frameworks of taxpayers. In this session, Dr Julianne Jaques S.C. will consider recent developments with a focus on the approach that Courts have taken to transfer pricing issues and the practical implications for taxpayers in the financial services industry.	<b>Dr Julianne Jaques SC, CTA</b> Victorian Bar
10.00–11.00am	<b>Session 9A: Residence &amp; Permanent Establishment – case studies</b> There has been uncertainty in recent years on the application of the Australian residency test for foreign companies, in light of the <i>Bywater Investments &amp; Ors v Commissioner of Taxation (Bywater)</i> decision in 2016, the ATO's subsequent withdrawal and replacement of TR 2004/15 with TR 2018/5 and practical compliance guide PCG 2018/9, and then a Board of Taxation ("BoT") review as requested by the Government.  To ease such uncertainty, the Government has proposed changes to the residency test which will be considered in this session. In addition, the speakers will consider some of the potential permanent establishment ("PE") implications arising for multinationals due to the COVID pandemic.  In particular, the speakers will consider: <ul style="list-style-type: none"> <li>— Concepts in the new test</li> <li>— Examples before and after</li> <li>— PE examples and tax authority responses</li> </ul>	<b>James Tomlinson</b> EY  <b>Chris Vanderkley, CTA</b> PwC; BoT Member
	<b>Session 9B: LIBOR transition</b> This session will consider the taxation and broader commercial implications arising from the cessation of LIBOR at the end of 2021. Noting the massive task required to change the calculation basis of all loan and derivative contracts currently referencing LIBOR, the session will provide insights as to the particular issues that have arisen and the role of both the ATO and Government to provide guidance and legislative change to promote a smooth transition.	<b>Steele Broderick, CTA</b> The Treasury  <b>Facilitator:</b> <b>Simon Jenner, CTA</b> EY
11.00–11.30am	<b>Morning tea</b>	
11.30am–12.30pm	<b>Session 10: Recent cases and rulings</b> This session will consider recent cases and rulings, including: <ul style="list-style-type: none"> <li>— Australian tax case law which has been determined in the Federal Court, Full Federal Court and High Court between January and December 2020, including an analysis of the win-loss percentage</li> <li>— Case law from other Commonwealth jurisdictions that is industry relevant and that may be persuasive in Australia</li> <li>— Recent rulings and guidance from the Australian Taxation Office that is of significance to the financial services industry</li> </ul>	<b>Joanne Dunne, CTA</b>  <b>Andrew Hirst, CTA</b> Greenwoods & Herbert Smith Freehills
12.30–1.30pm	<b>Session 11: ATO Q&amp;A</b> This session will provide an update on current areas of ATO focus in banking and finance, including Justified Trust, GST, treatment of goodwill and other issues on disposal of entities / assets / businesses, transfer pricing, and the hybrid rules. The session will include time for moderated Q&A.	<b>Nick Maley, FTI</b> Australian Taxation Office  <b>Facilitator:</b> <b>Rob Colquhoun, ATI</b> AFMA
1.30pm	<b>Conference close, light lunch and drinks</b>	





# Presenter profiles

**Nadia Alfonsi** is an Acting Assistant Commissioner in the Public Groups and International (PG&I) business line of the ATO. As part of her role, Nadia has responsibility for the Investment Industry Strategy, which includes assuring that insurance companies and large APRA regulated superannuation funds are paying the right amount of income tax. Nadia is also responsible for PG&I Engagement and Assurance teams in Parramatta and Newcastle managing a range of taxpayer engagement activities including tax assurance reviews of Top 100 and Top 1000 taxpayers. Nadia has previously held a number of roles across the ATO including Superannuation & Employer Obligations, Tax Counsel Network and the Treasury.

**Jennifer Batrouney AM QC**, is a barrister at the Victorian Bar practising in taxation, commercial, administrative, equity, superannuation and charity law. She was appointed a QC in 2000. She is Past President of the Australian Bar Association and Past President of the Victorian Bar and of the Tax Bar Association. She was elected to the Victorian Legal Services Board in 2018 and sits on the Victorian Legal Admissions Board committee. She sits on the Melbourne Law School Advisory Council and Tax Masters Advisory Board. She is also a Senior Fellow at the Melbourne Law School teaching tax and charity law in the Melbourne Law Masters. Jennifer was appointed a Member of the Order of Australia on 8 June 2020 for significant service to the law, to the legal profession, and to women lawyers.

**Jaydon Beatty** is a Director at the ATO with over 10 years' experience in tax administration. Jaydon currently leads the Common Reporting Standard (CRS) team which is responsible for ensuring Australia meets its international obligations on the delivery, exchange, and effective use of CRS data. Jaydon is also the Australian representative on OECD/Global Forums overseeing the global implementation and developments in the CRS. Additionally, Jaydon is responsible for providing technical law guidance to Financial Institutions on their CRS and Foreign Account Tax Compliance Act (FATCA) obligations.

**David Bradbury** is the Head of the Tax Policy and Statistics at the OECD. He joined the OECD in 2014, where he leads

a team that is focused on delivering high quality economic analysis and tax policy advice. David was a key contributor to the OECD/G20 BEPS Project and continues to contribute to the OECD's work on tax and digitalisation. Prior to joining the OECD, David was a lawyer, a Member of Parliament and Australian Government Minister.

**Andrew Bragg** is a Liberal Senator for New South Wales. Prior to his election to Federal Parliament in 2019, Andrew was an author and accountant. Andrew started his career as an accountant at Ernst & Young and went on to work in senior roles at the Financial Services Council and the Business Council of Australia. His 2017 short book *Fit for Service* (Connor Court) offers a framework for 21st century trade policy for Australia. Andrew was the National Director of the 2017 Liberals & Nationals for Yes campaign in support of same sex marriage which delivered Yes majorities in 71 of 76 Coalition seats. Following Andrew's election to the Senate, he was elected Chair of the Senate Select Committee into FinTech and RegTech and is a member of the Senate Economics Committee and Parliamentary Joint Committee on Corporations and Financial Services. In June 2020, Andrew launched his latest book, *Bad Egg: How To Fix Super*. Andrew was educated at the Australian National University (ANU) where he studied international relations and accounting.

**Steele Broderick, CTA**, is the Director of the International Tax Unit in the Corporate and International Tax Division at the Commonwealth Treasury. Steele has recently returned to Treasury following a secondment to the Australian Taxation Office as a Law and Policy Design Director. Prior to this, Steele managed the Financial Services Tax Unit at Treasury, specialising in the TOFA rules and other issues impacting the financial services industry. Steele has also held various roles in law interpretation at the ATO.

**Siew-Kee Chen, CTA**, is a Partner at Deloitte. He is the Deloitte Asia Pacific Regional Tax & Legal Leader for Investment Management. Siew-Kee is recognised as a leading tax adviser in investment management. Siew-Kee has over 24 years' experience providing tax advisory services to financial

services, real estate, private equity and infrastructure clients and advising throughout the entire deal life cycle, including mergers and acquisitions, due diligence, tax compliance and divestments. He delivers practical and commercial expertise to clients, drawing from his previous role as the Head of Tax of an Australian listed group. Siew-Kee has been heavily involved in the tax reform design for Management Investment Trusts and Financial Services.

**Rob Colquhoun, ATI**, is a Director of Policy at the Australian Financial Markets Association (AFMA), as well as the Company Secretary and Financial Controller. He has primary carriage of AFMA's taxation and anti-money laundering/counter-terrorism financing issues. Rob joined AFMA in December 2012 with more than 11 years experience in corporate taxation. Rob holds honours degrees in both Law and Commerce from the Australian National University.

**Joanne Dunne, CTA**, is a lawyer from Melbourne. She was formerly a tax partner at law firms in both Australia and New Zealand. She has more than 25 years' tax experience in general income tax, GST, international tax, and tax controversy. Joanne is a member of a wide range of professional organisations, including The Tax Institute's Tax Disputes Committee, and until 2020 she represented The Tax Institute on the ATO's Dispute Resolution Working Group.

**Scott Heezen** is a partner at King & Wood Mallesons in Sydney. Scott has more than 20 years' experience advising on a wide range of tax matters with a particular focus on property, infrastructure and funds transactions. He also advises numerous Australian banking and non-banking financial institutions on their capital raisings, financing and securitisation programs.

**Andrew Hirst, CTA**, is a Partner and Head of Financial Services at Greenwoods & Herbert Smith Freehills. Andrew advises on a range of corporate and banking-related tax issues with a particular focus on financial and international transactions. Andrew has worked with Treasury and the ATO on various areas of tax reform that impact the financial services industry.

## Presenter profiles continued

**David Honybun** leads the International Transparency area as an Assistant Commissioner at the ATO. The area has oversight of various Transparency measures as part of the OECD, Global Forum and also measures introduced domestically. These include Exchange of Information (EOIR) processes, Country by Country Reporting (CbCR), the Common Reporting Standard (CRS), the Foreign Account Tax Compliance Act (FATCA) and General Purpose Financial Statement (GPFS) measures. Prior to this role, David led the Public Groups & International – Client Engagement and Assurance area in Box Hill for 3 years, and prior to that led the Economist Practice for 16 years in the ATO.

**Julian Humphrey, CTA**, is a Partner of KPMG's Banking and Finance practice with over 20 years experience. He works primarily with international banks and financial services companies operating in Australia, providing corporate income tax and more recently transfer pricing services. Julian's areas of expertise include the taxation of banks and bank branches, the taxation of financial arrangements and retail financial products as well as Australia's offshore banking regime. He has advised on a number of major M&A transactions in the financial services sector in recent years. He is a regular participant in consultation with the government on Australia's tax reform proposals affecting Australian financial institutions.

**Dr Julianne Jaques SC, CTA**, is a senior counsel at the Victorian Bar specialising in taxation law. She has particular expertise in disputes involving complex commercial transactions and has appeared in many significant cases including *Bywater* and *Sharpcan* in the High Court. Prior to joining the Bar, Julianne spent 10 years in private practice with a major law firm and a major accounting firm. She was also senior tax adviser to the Federal Assistant Treasurer during the introduction of GST and business tax reform. Julianne 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 Independent Parliamentary Expenses Authority, the Tax Practitioners Board and the Board of Taxation. In March 2020, Julianne was awarded Chartered Tax Adviser of the Year.

**Simon Jenner, CTA**, is a Partner in the Financial Services Tax practice at EY, specialising in banking and capital markets. Simon has over 24 years' experience advising large corporates on a variety of tax issues, including capital management, capital raisings, mergers, acquisitions, disposals and the application of the tax consolidation regime. He has also advised extensively on the application of the taxation of financial arrangements rules.

**Joanne Langford** is a Special Counsel at King & Wood Mallesons in Sydney. Joanne specialises in corporate income tax and GST. Joanne advises on a wide range of tax matters, including project and asset financing, mergers and acquisitions, corporate restructures and securitisation and debt capital markets programs.

**Nick Maley, FTI**, is an Assistant Commissioner in the Public Groups and International group at the ATO. Prior to joining the ATO, Nick spent two years leading the Australian tax desk in New York. Nick has experience in corporate taxation advice on M&A transactions and international tax structuring. Nick is currently the AC for the Sydney Engagement and Assurance Teams and has responsibility for the ATO's Banking and Finance Strategy.

**Raffaella Malkoun** is a Director in the financial services tax team at PwC focused on investment management. She holds a Bachelor of Commerce from the University of Sydney and is a Chartered Accountant. Raffaella has over 11 years' experience in the provision of tax compliance and advisory services to a range of domestic and international investment management clients. This includes distribution calculation reviews, income tax return reviews, trust deed and Product Disclosure Statement reviews, assisting with Australian Taxation Office (ATO) reviews and obtaining private rulings from the ATO. Raffaella also advises on the establishment of new products, offshore investments and structuring, corporate actions, restructures, dividend franking, Investment Manager Regime and Attribution Managed Investment Trust Regime.

**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.

**Alison Noble, ATI**, is a Tax Partner at Deloitte with more than 20 years' experience providing advice to clients in the financial services industry with a focus on taxation issues for banking, securities and treasury. Alison also specialises in the U.S. Foreign Account Tax Compliance Act (FATCA), the OECD common reporting standard (CRS) and the U.S. qualified intermediary (QI) regime. She co-leads Deloitte's global information reporting (GIR) practice in Australia and is part of Deloitte's GIR team in Asia Pacific and globally.

**Matt Osmond, CTA**, is a Partner in the financial services corporate tax team at PwC focused on banking and financial services. He is a lawyer, Chartered Accountant and registered tax agent. Matt brings global and Australian insights in financial services and taxation to his corporate and international clients. Matt has over 26 years experience working with banks and financial services businesses in Australia and the UK and advises on a range of matters including taxation of derivatives, financial arrangements, dividend management and franking, funding, profit repatriation, branch taxation, tax effect accounting, asset administration, securitisation, hedging, foreign exchange transactions, leasing, commercial and consumer finance products, offshore banking units, M&A and employee share schemes.



## Presenter profiles continued

**Dr Deborah Ralston** has more than 25 years of board-level experience across commercial and public sectors, with experience in education, banking, superannuation and fintech sectors. She is currently a member of the Reserve Bank of Australia Payments System Board and is a Professorial Fellow at Monash University. Dr Ralston is also a member of the Steering Committee for the Melbourne Mercer Global Pension Index and the YBF Fintech Hub Advisory Board. Dr Ralston has held senior executive roles in Australian universities, most recently as Executive Director of the Australian Centre for Financial Studies and as a Professor of Finance with the Monash University Business School. She was the Principal Investigator of the CSIRO-Monash Superannuation Research Cluster, and inaugural Chair of ASIC's Digital Finance Advisory Committee. In 2018, Dr Ralston was appointed to the Comprehensive Income Products for Retirement Framework Advisory Committee.

**Meghan Speers** is a Financial Services Tax Partner at Deloitte. Meghan has over 20 years' experience advising superannuation funds on all areas of tax specialising in global investment tax considerations, trustee tax risk considerations and tax risk management and governance. Meghan has a particular passion for partnering with superannuation funds to optimise their tax operating models to address areas such as tax governance frameworks, tax communications and reporting, and partnering as a business partner of Funds. Meghan is Deloitte's Superannuation Tax Leader and is a member of ASFA's Tax Specialist Advisory Panel and the TIA's Superannuation Conference Committee.

**Terence Tan, CTA**, is a Tax Partner at Deloitte and has more than 18 years' experience, including substantial experience in the banking, funds and

custodial services industry. In particular, Terence specialises in operational taxes and customer tax reporting regimes (including the different withholding tax regimes, the U.S. Foreign Account Tax Compliance Act (FATCA), the OECD Common Reporting Standard (CRS), Annual Investment Income Reporting and enhanced third party reporting). He co-leads Deloitte's global information reporting (GIR) practice in Australia and is part of Deloitte's GIR team in Asia Pacific and globally.

**James Tomlinson** is a Partner in the Financial Services International Tax division and has over 15 years of tax consulting experience with Ernst & Young in the UK, US and Australia. James has expertise in managing complex and demanding projects, across a range of jurisdictions. He has significant experience in the development of cross-border investment and financing structures for financial services clients in the property and funds management industries. James has strong technical competence in Australian and international taxation matters and has advised clients on a wide range of transactions such as structured finance, IPOs, M&A deals and tax due diligence. He also advises a number of clients in respect of their ongoing tax compliance in Australia, including, MIT and AMIT compliance, withholding tax obligations.

**Chris Vanderkley, CTA** is Special Counsel at PwC leading their tax governance and transparency practice. Prior to joining PwC, Chris worked at GE for 20+ years in numerous roles including Chairman of all GE Boards, CFO and Asia Pacific Head of Tax. Chris was a member of the CTA Executive Committee for 8 years and has recently joined the Board of Taxation as a board member. Chris is CTA of the TIA and a Chartered Accountant.

**Martin Wiesinger, ATI** is the Head of Group Tax for AMP. Martin has over 20 years experience in the industry, having held senior chartered and in-house roles. Martin has deep experience in fund management, wealth management, banking and real estate. Martin's experience includes having advised on several large corporate transactions. Martin is a Solicitor of NSW.

**Danielle Wood** is the CEO of the Grattan Institute. She believes in the power of public policy to make Australia a better place. Danielle has published extensively on economic reform priorities, budget policy, tax reform, generational inequality and reforming political institutions. She is a sought-after media commentator and speaker on policy issues. Danielle previously worked at the ACCC, NERA Economic Consulting and the Productivity Commission. She holds an Honours degree in Economics from the University of Adelaide and Masters degrees in Economics and Competition Law, from the University of Melbourne. Danielle is the National President of the Economic Society of Australia and co-founder and former Chair of the Women in Economics Network.

**Ethan Zuo, CTA**, is a Tax Partner at KPMG. He has over 14 years tax advisory experience and has experience in advising financial services clients on mergers and acquisitions, cross-border transactions and corporate matters. Ethan has advised clients on a number of significant transactions in wealth and funds management, insurance, and real estate. Ethan is a Chartered Tax Advisor, and a member of the Financial Services Council Life Insurance Tax Experts Group.

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## Join the conversation



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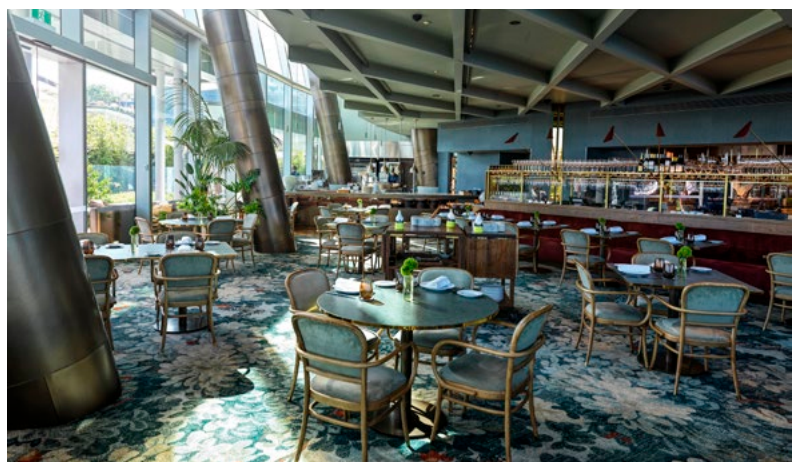
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# Venue and accommodation



## Crown Towers Sydney

Crown Towers offers uncompromising design that captures the essence of its harbourside setting, highly intuitive personalised service, and the finest dining and facilities unlike anything Sydney has seen before.

Located in the bustling precinct of Barangaroo, connected to sprawling parklands, laneway bars, beautiful public artworks and bay views of Sydney.

## Accommodation

Favourable room rates have been negotiated and secured at the Crown Towers Sydney. Accommodation bookings can be made through our accommodation and travel provider, ConferenceNational, by following the link on the event web page.

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

## Getting there

Crown Towers Sydney is centrally located along the Barangaroo waterfront, yet still close to the heart of Sydney.

Sydney Airport is located just 15 kilometers from the hotel.

## Parking

Valet Parking is available through the hotel's Bell Desk team at the rate of \$80.00 per 24 hours. Alternatively, The Barangaroo Reserve car park is a 10 minute walk to Crown Sydney. We invite you to visit the website to view the most current rates and book in advance <https://www.carepark.com.au/find-a-care-park/barangaroo-reserve/>

## Contact tracing

We will keep a record of attendance for all meetings and events of The Tax Institute and will use this data for contact

tracing purposes if necessary. For more information on how we will use the data that will be collected, and your rights in relation to that information, please see our Privacy Policy.

## 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.





# Event information

## Face to face registration inclusions

- Participation in the full technical program
- Electronic access to technical materials prior to the retreat and post-event recordings
- Lunch and refreshment breaks during the retreat on both Thursday and Friday
- Cocktail Function on Thursday evening

## Online registration inclusions

- Participation in the full technical program via live-stream or post event recordings
- Electronic access to technical materials prior to the retreat

## Early bird registration

All registrations received and paid on or before Friday 26 March will be entitled to the early bird discount.

## Group discounts

If you are registering four or more people from the same firm, please contact the National Events team on 02 8223 0040 or at [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

## CPD Accreditation

Attendance at the event counts for 11 hours Continuing Professional Development (CPD) accreditation with The Tax Institute.

## Confirmation of registration

On receipt of registration and payment, you will receive an email containing your event confirmation.

## 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 event platform

Program information, materials (technical papers and slides), evaluation forms and more will be available via The Tax Institute's event platform for face to face and online attendees. All delegates are encouraged to review the event materials and familiarise themselves with the event platform prior to the event.

## Delegate list

A delegate list will be included on the event platform to assist with networking. Please indicate on the registration form if you do not want your name included on the list.

## Dress code

Business casual attire is suitable for the duration of the event program, including the official dinner.

## Networking function – Thursday, 22 April 2021

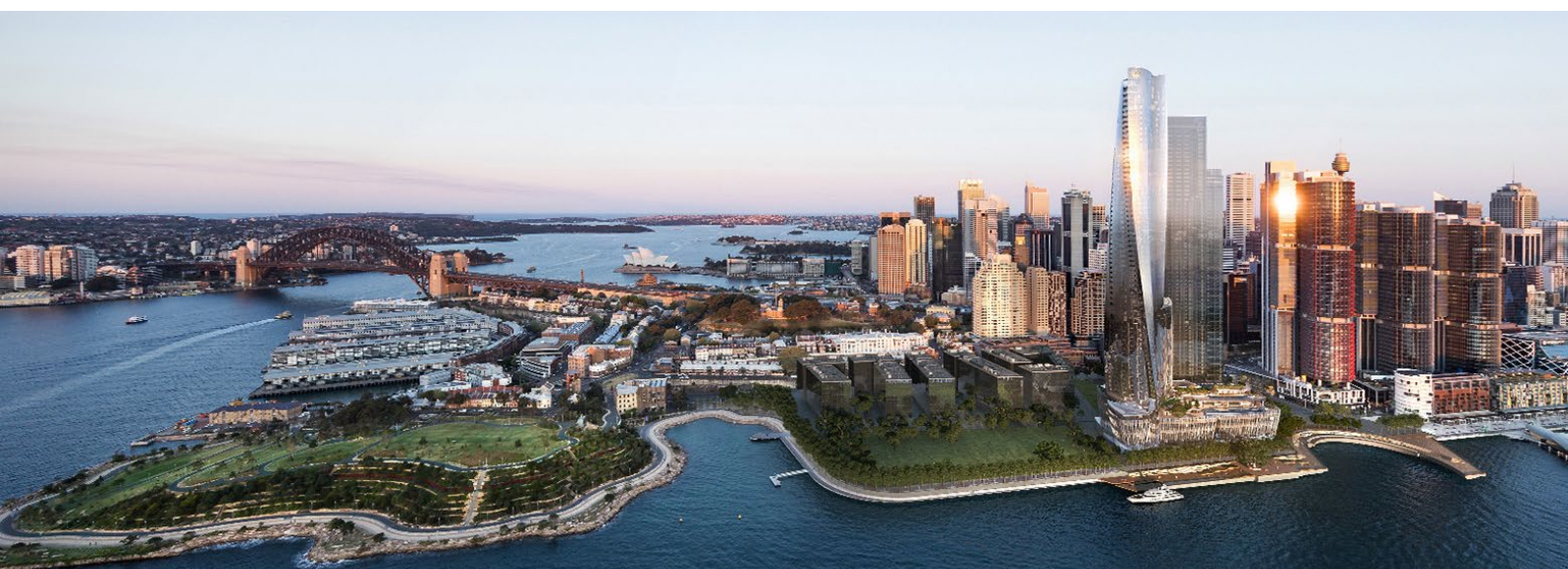
The cocktail function will be held at A'Mare at Crown Sydney on Thursday 22 April directly following the last session of the Conference. The networking function is included in the conference registration fee for all face to face attendees. Please indicate any dietary requirements on the registration form.

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**For further information regarding this event, please contact the National Events Team on 02 8223 0040 or email**

**[nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au)**

**For registration enquiries, please contact our customer admin team on 02 8223 0000 or email**  
**[customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au)**







THE TAX INSTITUTE

# 2021 Financial Services Taxation Conference Registration form

41349 | WD

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

### Face to face – Full conference registration

	Member	New member*	Non-member
<b>Early bird registration</b> Register on or before Friday 26 March	<input type="checkbox"/> \$1,600	<input type="checkbox"/> \$1,940	<input type="checkbox"/> \$1,900
<b>Standard registration</b> Register after Friday 26 March	<input type="checkbox"/> \$1,800	<input type="checkbox"/> \$2,140	<input type="checkbox"/> \$2,100

### Virtual – Full conference registration

	Member	New member*	Non-member
<b>Early bird registration</b> Register on or before Friday 26 March	<input type="checkbox"/> \$1,350	<input type="checkbox"/> \$1,690	<input type="checkbox"/> \$1,650
<b>Standard registration</b> Register after Friday 26 March	<input type="checkbox"/> \$1,550	<input type="checkbox"/> \$1,890	<input type="checkbox"/> \$1,850

Dietary requirements:

Promotional code:

### \*Become a member and save!

Not a member of The Tax Institute yet?  
Sign up for membership along with your event registration and save with:

- up to 50% off membership to 30 June 2022
- member-only prices to this and future events
- free access to member-only technical resources.

Find out more about membership at  
[info.taxinstitute.com.au/membership](http://info.taxinstitute.com.au/membership).

I hereby apply for membership of The Tax Institute and declare that I am a person of good fame, integrity and character. I agree to be bound by the Constitution of The Tax Institute.

Signature:

Date of signature:

DD/MM/YYYY

## 2 Delegate contact details

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

Member no.:

Title: ☐ Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Other (please specify)

First name:

Position:

Address:

Suburb:

Telephone:

Mobile:

Last name:

Company:

State:

Postcode:

Fax:

Email:

Date of birth:

DD/MM/YYYY

☐ 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 Breakout session selection

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

### Thursday, 22 April 2021

- |                 |                                     |                                     |
|-----------------|-------------------------------------|-------------------------------------|
| 11.00am–12.00pm | <input type="checkbox"/> Session 3A | <input type="checkbox"/> Session 3B |
| 12.00–1.00pm    | <input type="checkbox"/> Session 4A | <input type="checkbox"/> Session 4B |
| 2.00–3.00pm     | <input type="checkbox"/> Session 5A | <input type="checkbox"/> Session 5B |
| 3.30–4.30pm     | <input type="checkbox"/> Session 6A | <input type="checkbox"/> Session 6B |

### Friday, 23 April 2021

- |               |                                     |                                     |
|---------------|-------------------------------------|-------------------------------------|
| 10.00–11.00am | <input type="checkbox"/> Session 9A | <input type="checkbox"/> Session 9B |
|---------------|-------------------------------------|-------------------------------------|

## 5 Cocktail function

The Cocktail function is INCLUDED in the registration fee for delegates.

Thursday 22 April: Crown Sydney

- ☐ Yes, **I WILL** be attending the Cocktail function **OR**  
☐ No, **I WILL NOT** be attending the Cocktail function

\*Please supply names of attendees and any dietary requirements as a separate attachment.

## 6 Payment summary

Registration fee

\$

Total payable

\$

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

## 7 Payment method

- ☐ **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](http://taxinstitute.com.au/professional-development/event-policy).

## 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](http://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

➤ **Online** [taxinstitute.com.au/2021FINS](http://taxinstitute.com.au/2021FINS)

@ **Email** [customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au)

✉ **Mail** L37, 100 Miller Street, North Sydney NSW 2060

☎ **Fax** 02 8223 0077



THE TAX INSTITUTE

L37, 100 Miller Street  
North Sydney NSW 2060

Tel 02 8223 0000  
Fax 02 8223 0077

For information, please contact the National Events Team  
at [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au)

[taxinstitute.com.au](http://taxinstitute.com.au)