



THE TAX INSTITUTE



Financial Services Taxation Conference

10–11 March 2022 | Crown Sydney & Online

11 CPD hours

Welcome

On behalf of The Tax Institute and the Organising Committee, it gives me great pleasure to invite you to attend the Financial Services Taxation Conference to be held online and in Sydney from 10 – 11 March 2022.

The Tax Institute's Financial Services Taxation Conference has long been the leading conference for financial services taxation professionals in Australia.

This year we have assembled a broad selection of experts and presenters from policy-makers, academics, bankers, barristers, tax lawyers and accountants to bring the perspectives of regulators, government, taxpayers and advisers to you.

As the Australian and the global economy seek to return to growth from the past two years, there will be increased focus on revenue measures, industry drivers and technical issues, with an agenda designed to provide valuable insights and knowledge for all financial services taxation professionals.

The conference will have many highlights including the OECD update presented by Pascal Saint-Amans, Part IVA perspectives from Peter Walmsley, Kristen Deards SC and The Hon. Tony Pagone QC, capital management and M&A insights from Barrenjoey, Citi, Greenwoods & Herbert Smith Freehills and EY, as well as several technical, reform and tax governance topics. We will also hear from senior ATO officers about the areas of key focus for financial services.

As always, this conference is also a great opportunity to meet other financial services taxation professionals and re-connect with friends and colleagues.

I know it will be a great conference and I look forward to seeing you online or at Crown Sydney in March 2022.



Matt Osmond, CTA
PwC
Chair, Conference Organising Committee

Event organising committee

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

Matt Osmond, CTA, PwC (Chair)

Vivian Chang, CTA, Ashurst

Rob Colquhoun, AFMA

Siew-Kee Chen, CTA, Deloitte

Nitin Gulati, Australian Taxation Office

Matt Hartshorn, CTA,
Macquarie Group

Andrew Hirst, CTA, Greenwoods
& Herbert Smith Freehills

Simon Jenner, CTA, EY

Jason King, CTA

Peter Nearhos, CTA, QIC

Natalie Raju, KPMG

Angela Wood, CTA, Clayton Utz

Early bird offer

Register on or before Friday, 11 February 2022 to save!

Technical program

Day 1 – Thursday, 10 March 2022

Time	Session	Presenter
8:00–8:30am	Registration	
8:30–8:45am	Opening address & President's welcome	Jerome Tse, CTA President The Tax Institute
8:45–9:30am	Session 1: Economic update: tax policy and reform This session will provide an overview on the global and local economic and business impacts of COVID-19, the role of the tax system in stimulating business recovery and jobs and the opportunity for tax reform in Australia.	Warren Hogan Judo Bank, EQ Economics Andrew Mills, CTA (Life) The Tax Institute
9:30–10:30am	Session 2: Australia as a regional Financial Services hub The Australian Finance & Technology Centre Advisory Group (AFTCAG) was convened in August 2020 to develop a set of policy options to attract more Asia-Pacific headquarters to Australia and to improve the international competitiveness of Australia as a financial centre. The AFTCAG report was released in January 2021 and contained various recommendations, including in relation to tax matters. This session will explore Australia's readiness to be a financial services regional hub, by: <ul style="list-style-type: none">– Summarising the AFTCAG Report recommendations– Comparing incentives in Asia for Financial Services– Providing an update on which recommendations have been adopted, and– Looking forward to other reform areas, such as OBU reform, Crypto assets and ESG.	Antoinette Elias, CTA EY Andrew Low Australian British Chamber of Commerce
10:30–11:00am	Morning tea	
11:00am–12:00pm	Session 3A: Expanding Australia's tax treaty network In September 2021, the Australian Government announced that it was expanding Australia's tax treaty network with a plan to enter into 10 new and updated tax treaties by 2023, building on our existing network of 45 bilateral tax treaties. This session will provide: <ul style="list-style-type: none">– An update as to the current status of the Government review project– Provide an overview of new treaties being negotiated and key features we can expect in those treaties– Detail any key changes being considered in relation to existing treaties– Outline current trends and issues arising in relation to tax treaties, and– Consider non-discrimination following the High Court decision in <i>Addy</i>.	Richard Vann, CTA Sydney University
	Session 3B: New fund structures The new Corporate Collective Investment Vehicle (CCIV) has been a long time in the making but is now imminent. This panel session brings together Australian and international experts across the industry to provide insights into the tax and regulatory features of the proposed new regime. The panel will also explore the evolution of the CCIV regime and provide an international comparison as against our peers (including the Singapore Variable Capital Company (VCC) and other new Asia fund structures) to assess the relative attractiveness and highlight the further legislative developments that are needed to achieve scale.	Panellists: Glenda Hanson King & Wood Mallesons Natalie Raju KPMG Michael Velten Deloitte Facilitator: Siew-Kee Chen, CTA, Deloitte

Technical program continued

Day 1 – Thursday, 10 March 2022 continued

Time	Session	Presenter
12:00–1:00pm	Session 4A: Capital Management This session will cover the following areas: <ul style="list-style-type: none">– Market trends in equity capital markets– Future direction of capital management in the financial services industry– Consideration of key tax issues from a technical and practical perspective, including:<ul style="list-style-type: none">– returning funds to shareholders including special dividends, capital returns, on-market and off-market share buy-backs; and– raising capital, including rights issues and hybrid capital– Impact of BEPS	Julian Pinson, FTI Greenwoods & Herbert Smith Freehills Barry Sharkey Barrenjoey
	Session 4B: The emergence of digital assets and their related taxation complications The growing use of blockchain technology in the financial sector has seen an expansion of digital assets, tokens and crypto currencies. This innovation creates difficulties for accountants, regulators and tax authorities as existing frameworks are tested by these products. This session will: <ul style="list-style-type: none">– provide a very brief summary of the types of digital assets and related financial products– review some of the key regulatory and accounting considerations that these new products face today, and– look closely at the tax challenges these new products create within the existing tax frameworks, including TOFA, CFC attribution, Public Trading Trusts, GST (digital services tax and counterparties) as well as reporting and Exchange of Information considerations.	Julian Humphrey, CTA KPMG Samantha Shields KPMG
1:00–2:00pm	Lunch	
2:00–3:00pm	Session 5: Legal Professional Privilege Legal Professional Privilege (LPP) protects the confidentiality of certain communications made or in connection with giving or obtaining legal advice, or in anticipation or conduct of litigation. Taxpayers may rely on LPP to provide immunity from the exercise of the Commissioner's powers that would otherwise compel disclosure of privileged communications. This session will cover: <ul style="list-style-type: none">– LPP fundamentals– Claiming LPP in practice– ATO's LPP protocols– Implications of recent cases (including CUB, JBS)– LPP dispute resolution and– Practical tips for taxpayers going forward.	Panellists: Belinda Darling Australian Taxation Office Faith Harako Australian Taxation Office Hugh Paynter, CTA Herbert Smith Freehills Chris Peadon, FTI New Chambers Facilitator: Angela Wood, CTA Clayton Utz

“The Financial Services Taxation Conference provides high quality speakers offering deep insight into current topics relevant to tax professionals within the industry. The content is fast paced and the optional break-outs ensure that content relevant to particular sub-sectors is covered and delivered at the appropriate level of depth. There are also plenty of opportunities throughout the conference to come together socially, have some fun and expand your network.”

Natalie Raju, KPMG

Technical program continued

Day 1 – Thursday, 10 March 2022 continued

Time	Session	Presenter
3:00–3:30pm	Afternoon tea	
3:30–4:30pm	Session 6A: Hybrids in practice The hybrid mismatch rules have now been operational for two years in Australia. While the rules are designed to prevent multinational companies from gaining an unfair competitive advantage by avoiding income tax or obtaining double tax benefits through hybrid mismatch arrangements, the rules can have unexpected application and have significant compliance costs. This session will outline the potential impact of the hybrid rules in financial services (FS) including examples of some common and some unexpected arrangements where the rules may apply. This session will also discuss the Commissioner's practical compliance guidelines including the ATO's expectations of taxpayers and approach to compliance.	Ryan Kinsella Australian Taxation Office Sach Pelpola PwC
	Session 6B: M&A in Financial Services Competition for strategic market advantage continues to fuel mergers and acquisitions (M&A) across financial services (FS). This session will provide a summary of global and local M&A activity within the FS markets, what's driving M&A and what might lie ahead for Australian banks, non-bank financiers, insurance companies, asset managers and FinTech. This session will also cover some topical taxation issues in FS M&A in Australia including case studies involving demergers, employee equity and other issues.	Adeline Chew Citi Daryl Choo, ATI EY
4:30–5:30pm	Session 7: OECD tax policy update This session will cover the current OECD projects and initiatives, including the proposed two-pillar solution for the digitisation of the global economy, the role of tax policy in stimulating global economic growth and the impact of OECD policies for Australian business.	Pascal Saint-Amans OECD Facilitator: Rob Colquhoun, ATI AFMA
5:30–7:30pm	Cocktail function, Smoke	

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Cocktail Function – Thursday, 10 March 2022

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

Time: 5.30–7.30pm
Venue: Smoke
Address: Barangaroo House, Level2, 235 Barangaroo Ave
Price: Included for full registration delegates
Dress: Business or business casual



Technical program continued

Day 2 – Friday, 11 March 2022

Time	Session	Presenter
9:00–10:00am	<p>Session 8: Reflection on Part IVA</p> <p>With the 40th anniversary of Part IVA last year, our panel will reflect on Part IVA's development over the years with a focus on where we are now. Our panel is uniquely qualified to provide insights into different perspectives on Part IVA including from the perspective of the ATO, industry and the judiciary.</p>	<p>Panellists: Kristen Deards SC Banco Chambers</p> <p>The Hon. Tony Pagone QC Victorian Bar</p> <p>Peter Walmsley Australian Taxation Office</p> <p>Facilitator: Andrew Hirst, CTA Greenwoods & Herbert Smith Freehills</p>
10:00–11:00am	<p>Session 9A: The FS tax function of the future</p> <p>In this session, our panel will discuss the evolution of the tax function across different segments of the financial services industry, including the challenges presented by shifting dynamics on matters such as:</p> <ul style="list-style-type: none"> – Operating models – Technology and data – Risk and governance, and – People management 	<p>Panellists: Philip Duffy, CTA Rabobank</p> <p>Di Govan ANZ</p> <p>Bronwyn Tan BlackRock</p> <p>Peter Zorbas Commonwealth Superannuation Corporation</p> <p>Facilitator: Matt Hartshorn, CTA Macquarie</p>
	<p>Session 9B: OECD / G20 Two Pillar Solution</p> <p>Many consider this to be the most fundamental change to the international tax rules. The OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS) recently endorsed the key components of the two-pillar approach to international tax reform. The agreement has set an ambitious, and challenging, timeline for both Pillars. This session will unpack the latest developments and examine the key implementation issues impacting the financial services industry, with a key focus on practical challenges and critical steps Australian enterprises need to consider now.</p>	<p>Kathryn Davy The Treasury</p> <p>Amelia Teng Deloitte</p>
11:00–11:30am	Morning tea	
11:30am–12:30pm	<p>Session 10: Cases and Rulings update</p> <p>This session will consider recent cases and rulings, including:</p> <ul style="list-style-type: none"> – Australia tax case law which has been determined in the Federal Court, Full Federal Court and High Court between January and December 2021, including an analysis of the win-loss percentage – Case law from other Commonwealth jurisdictions that is industry relevant and that may be persuasive in Australia – Recent rulings and guidance from the Australian Taxation Office that is of significance to the financial services industry 	<p>Joanne Dunne, CTA Steve Whittington Ashurst</p>
12.30–1.30pm	<p>Session 11: ATO Update</p> <p>This session will provide an update on current areas of ATO focus in the banking and finance industry, including income tax, GST, justified trust and other issues. The session will include time for moderated Q&A.</p>	<p>Panellist: James Campbell Australian Taxation Office</p> <p>Virginia Gogan Australian Taxation Office</p> <p>Facilitator: Matt Osmond, CTA PwC</p>
1.30pm	Conference close, light lunch, networking and drinks	



Presenter profiles

James Campbell is a Director, managing the Banking and Finance Strategy in the Public Groups business line of the ATO. James has 20 years experience in compliance, audit and public advice with a focus on the banking and finance industry. Areas of expertise include capital management and hybrid financing, offshore banking units (OBUs), transfer pricing, branch attribution, controlled foreign corporations (CFCs), Part IIIB and thin capitalisation. James is currently playing a leading role in the delivery of the ATO's Top 100 and Top 1,000 program in relation to the banking and finance industry.

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 25 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, CCIVs and Financial Services.

Adeline Chew is a senior Director at Citi. She has advised financial institutions for over 15 years, with expertise in M&A and capital markets and is experienced across banking, non-bank financial institutions, wealth management, insurance and fintech sectors.

Daryl Choo, ATI, leads EY's transaction tax practice within the financial services group. She is a tax partner with over 25 years of tax experience with EY. Daryl has extensive Australian and international tax experience including a 5 year secondment to EY London. Her clients primarily operate in the wealth

and asset management and banking and finance sectors. Daryl specialises in providing tax advice on the structuring of international and domestic funds/products; tax due diligence on the acquisition of international and domestic entities; IPO of international and domestic entities; and pre and post transaction restructures.

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.

Belinda Darling joined the ATO in 2009 and is an Assistant Commissioner in the Public Groups and International business line leading the International Relations, Capacity Building and Transparency Programs. This role involves engagement with tax administrations, donor organisations and tax experts to share best practice and build international capacity in tax administrations, with a focus on the Asia Pacific region. She works in partnership with the Department of Foreign Affairs and Trade, Treasury, and other APS agencies to ensure programs are aligned with Australia's tax policy objectives and economic programs. Belinda has a proven track record for delivering innovative products and services across the ATO in senior leadership roles for more than 10 years. She has accumulated more than 20 years of taxation experience in different roles, including working for the OECD in Paris as a strategic advisor and developing new international tax policies, and in the private sector for large law and accounting firms in Australia, New York, and London.

Kathryn Davy is an Assistant Secretary in the Commonwealth Treasury and leads the International Tax Branch in

the Corporate and International Tax Division within the Revenue Group of Treasury. Prior to joining Treasury, she had many decades experience as a tax adviser with leading accounting firms and as Australian Head of Tax in a major corporate group.

Kristen Deards SC appears for taxpayers and the Commissioner of Taxation in income tax and GST cases in the Administrative Appeals Tribunal, the Federal Court and the High Court of Australia. She has appeared in a large range of tax cases, from complex Part IVA and transfer pricing cases, to disputes concerning CGT, the consolidation regime, international tax, superannuation, insurance, trusts and charities.

Philip Duffy, CTA, is the Head of Tax for Rabobank's Australian and New Zealand operations. He has over 25 years' experience in financial services taxation, having worked in the profession and with a number of foreign banks.

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.

Antoinette Elias, CTA, is the Financial Services Oceania Tax Market Segment Leader and is a Tax Partner with over 37 years' experience as a tax adviser. Antoinette has extensive experience in advising on the tax issues facing the wealth and asset management sector such as custodians, managed investment trusts, fund managers, superannuation funds and hedge funds. In particular, Antoinette has been and continues to be heavily involved in the consultation process regarding the unprecedented level of policy changes and proposed tax rules facing the financial services industry.

Presenter profiles continued

Virginia Gogan is a Senior Director in the GST Financial Services and Insurance Strategy team, leading the ATO's strategies for engaging with the industry. Virginia has also worked in the Tax Counsel Network at the ATO, including developing a suite of new public advice and guidance products around GST apportionment for financial suppliers in particular retail banking contexts. Previously, Virginia has worked on the law design and practical implementation of GST cross-border measures for digital services and low value goods, at both New Zealand Inland Revenue and the ATO.

Di Govan is the Head of Tax Operations at Australia and New Zealand Banking Group Limited (ANZ) and has held various tax roles at ANZ over the last 15 years. Prior to joining ANZ, Di had a 12 year career in tax advisory services working across different industries, including financial services, providing advice to international companies on tax strategy, tax risk management, tax controversy management and transfer pricing. Most of that time was spent with Ernst & Young, in Melbourne and in Dublin, as well as in the Tax function of a large European-based multinational.

Glenda Hanson is a Special Counsel in the Sydney office of King & Wood Mallesons where she specialises in the law of investment funds and financial services regulation. Her 25 years of experience in the firm's funds team ranges from major transactions in the listed market, to launching AQUA quoted products and managed investment schemes for both retail and wholesale investors. Glenda has advised extensively on structuring and restructuring funds (including stapled structures), capital raising, licensing, disclosure, investment management, governance, compliance and custody. She has served on several FSC working groups, including on the attribution MIT reforms, and on the CCIV regime throughout its development. Before joining Mallesons in 1996, Glenda worked in house for seven years with a small funds management business.

Faith Harako is an Assistant Commissioner for the Client Assurance Top 100 Program in the Public Groups

and International business line. She currently oversees the Top 100 Program which applies the justified trust methodology to obtain greater assurance that the largest corporate taxpayers in Australia are meeting their tax obligations in a timely and transparent manner. Faith is involved in leading the development of the LPP Protocol to assist and support taxpayers when making LPP claims.

Matt Hartshorn, CTA, is the Head of Tax at Macquarie Investment Management. He has over 15 years experience with a particular focus on international tax and funds management. He has advised extensively on a range of investments and transactions involving listed equities, fixed income securities, hedge funds and private equity in Australia, Asia, the US and Europe. Matt is a member of the Financial Services Council's Tax Expert Group and frequently participates in the development of Australian tax laws. He is also the chair of the Tax Institute's Financial Services Conference Organising Committee. Prior to joining Macquarie in 2007, Matt specialised in corporate and international tax at KPMG and Reach.

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.

Warren Hogan is an economist and financial markets strategist who has worked for major banks and Government for the past 25 years. He is based in Australia having worked for The Australian Government Treasury, Credit Suisse and ANZ Bank where he held the position of Chief Economist from 2010 to 2016. Warren has extensive international experience having spent much of the past 25 years travelling the world speaking to investors, governments and major corporations about the world economy and global financial markets. His advice is sought by investors, politicians and corporate leaders. As ANZ Chief Economist, Warren was responsible for a team of 50 economists and strategists with a focus on the Asian region and the global markets. Warren has been

recognised as one of Australia's top business economists in industry surveys and awards. He is a commentator in the media with regular interviews on ABC, Sky, CNBC and Bloomberg as well as major global publications including The Economist magazine and The Financial Times. He is an Industry Professor and the inaugural Executive in Residence at the UTS Business School in Sydney.

Julian Humphrey, CTA, is a Partner of KPMG's Banking and Finance practice with over 25 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.

Andrew Low is National Chairman of the Australia British Chamber of Commerce and also Chairs the Australian Finance & Technology Centre Advisory Group and Cobden Reid Advisory. He is a Director of the Bell Shakespeare Company, Hunter Ferdinand Healthcare REIT and the Europe Australia Business Council. Andrew was previously Chairman of PRP Diagnostic Imaging Limited and of CLSA Australia, Deputy Chairman of Asia Society and a Member of the Australian Takeovers Panel. Prior to becoming a professional non-executive Director, Andrew held a number of senior roles with Macquarie Group in Sydney, London and Hong Kong, including as Global Head of Telecommunications, Media, Entertainment & Technology and Global Head of Financial Services for Macquarie Capital, Head of Asia and then as Chief Operating Officer for Macquarie Capital globally. He has also been the HK-based Global Head of Investment Banking for CLSA and the Chief Executive of RedBridge Grant Samuel. Andrew is a Fellow of the Australian Institute of Company Directors and of the Financial Services Institute of Australasia.

Presenter profiles continued

The Hon. Tony Pagone QC has returned to practice as a barrister, after retiring from the Federal Court of Australia where he had been the national co-ordinating judge of the Taxation National Practice Area. Before his appointment to the Federal Court he was a judge of the trial division of the Supreme Court of Victoria and had been the judge in charge of the Commercial Court of that Court. He practised widely in taxation law, commercial law, administrative law, constitution law, public and human rights law during his career at the Bar. He was also Special Counsel to the Australian Taxation Office between 2002 and 2004. He is a professorial fellow of the Melbourne Law School and lectures in several post-graduate courses at the Melbourne Law School and from time to time in the Law Faculty at Monash University. He was the President of the International Association of Judges from October 2018 to September 2021 and had been on the board of the International Association of Tax Judges.

Hugh Paynter, CTA is a Disputes Partner at Herbert Smith Freehills based in Sydney. He has practised in the tax disputes area since 2002. His key focus areas are anti-avoidance, transfer pricing and international tax, acting for clients in banking and insurance, mining and energy, technology and pharma. He has acted extensively in matters involving legal professional privilege across both tax and other regulatory investigations, as well as in commercial disputes generally. He was a member of the Law Council sub group working with the ATO on their most recent privilege guidance.

Chris Peadon, FTI, has practised at the NSW Bar since 2011 and previously worked as a solicitor for a decade. He regularly advises and appears for taxpayers and the Commissioner.

Julian Pinson is a Partner at Greenwoods & Herbert Smith Freehills Pty Limited. Julian advises on a wide range of tax matters, with a focus on banking and financial services, property, M&A and funds management. Julian has particular expertise in cross-border

finance, TOFA, corporate restructures, debt and equity raisings and M&A.

Natalie Raju is a Tax Partner within the Financial Services division of KPMG, with more than 20 years' experience advising on taxation issues relevant to the funds management, custody and broader financial services industry. Natalie also has five years in-house experience with a fund manager, where she was a lead product originator and tax counsel. Natalie has a particular passion for financial product innovation and partnering with financial service providers to ensure the correct tax outcomes.

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 27 years' experience working with banks and financial services businesses in Australia and the UK and advises on a range of matters including taxation of derivatives, financial arrangements, dividend management and franking, funding, profit repatriation, branch taxation, tax effect accounting, asset administration, securitisation, hedging, foreign exchange transactions, leasing, commercial and consumer finance products, offshore banking units, M&A and employee share schemes.

Pascal Saint-Amans is the Director of the Centre for Tax Policy and Administration at the OECD. For the past 10 years, he has played a key role in the OECD's international tax negotiations which have deeply changed the international tax framework to improve transparency, fairness and efficiency, and make it more inclusive. As Director of the Centre for Tax Policy and Administration, he has set the strategic direction and led the Organisation's work on tax treaties and transfer pricing, tax policy and statistics, tax administration and on domestic resource mobilisation with the flagship initiative Tax Inspectors Without Borders. He is the recipient of numerous honours and awards, and has regularly been listed in the top 50 most influential people in global tax.

Barry Sharkey is a Founding Partner at Barrenjoey, advising corporate clients on a broad range of capital markets, financing and capital management transactions. Prior to joining the firm in 2021, Barry was a Managing Director at UBS.

Samantha Shields is a Partner at KPMG specialises in providing financial services legal advice to domestic and international financial services providers including investment banks, product issuers, fund managers and brokers regarding financial products, derivatives, and financial markets. She brings a thoughtful and pragmatic approach to help her clients manage legal and regulatory risk.

Bronwyn Tan joined BlackRock Australia in 2015 as the Head of Tax in Australia and has over 20 years of experience in financial services and tax, in both professional services firms and in commercial tax roles. In her role at BlackRock Australia she is responsible for the tax administration and compliance for all the BlackRock Australia funds. She was involved in the implementation of the AMIT rules affecting fund distributions and is a regular attendee at the Tax Expert Committee of the Financial Services Council, participating in consultations affecting the managed funds industry.

Amelia Teng is an international tax partner at Deloitte who specialises in cross-border tax structuring issues and has a focus on tax policy initiatives and BEPS reforms. In her past roles she was closely involved in the development and implementation of the hybrid mismatch rules.

Richard Vann, CTA, is Challis Professor of Law at the University of Sydney and has taught at Harvard and NYU Law Schools and the Universities of Amsterdam, London and Oxford. Richard has worked in the past at the IMF and OECD and held many Government consultancies in Australia and elsewhere. He has been a consultant for specialist tax firm Greenwoods & Herbert Smith Freehills since 1985. Richard specialises in corporate and international taxation on which he has published widely both in Australia and internationally.

Presenter profiles continued

Michael Velten is a financial services tax partner with Deloitte Singapore and leads the firm's Investment Management and Real Estate practice in Southeast Asia and has 35 years of finance, legal, tax and management experience. Prior to joining Deloitte in 2013, Michael had held senior tax roles with global financial institutions and leading professional firms (both law and accounting) in Asia. Michael advises on all areas of financial services tax; his focus includes fund structuring, private equity, real estate and financing transactions. Michael retains a focus on tax policy and has led and / or worked on, projects for both industry bodies and supranational organisations in Asia.

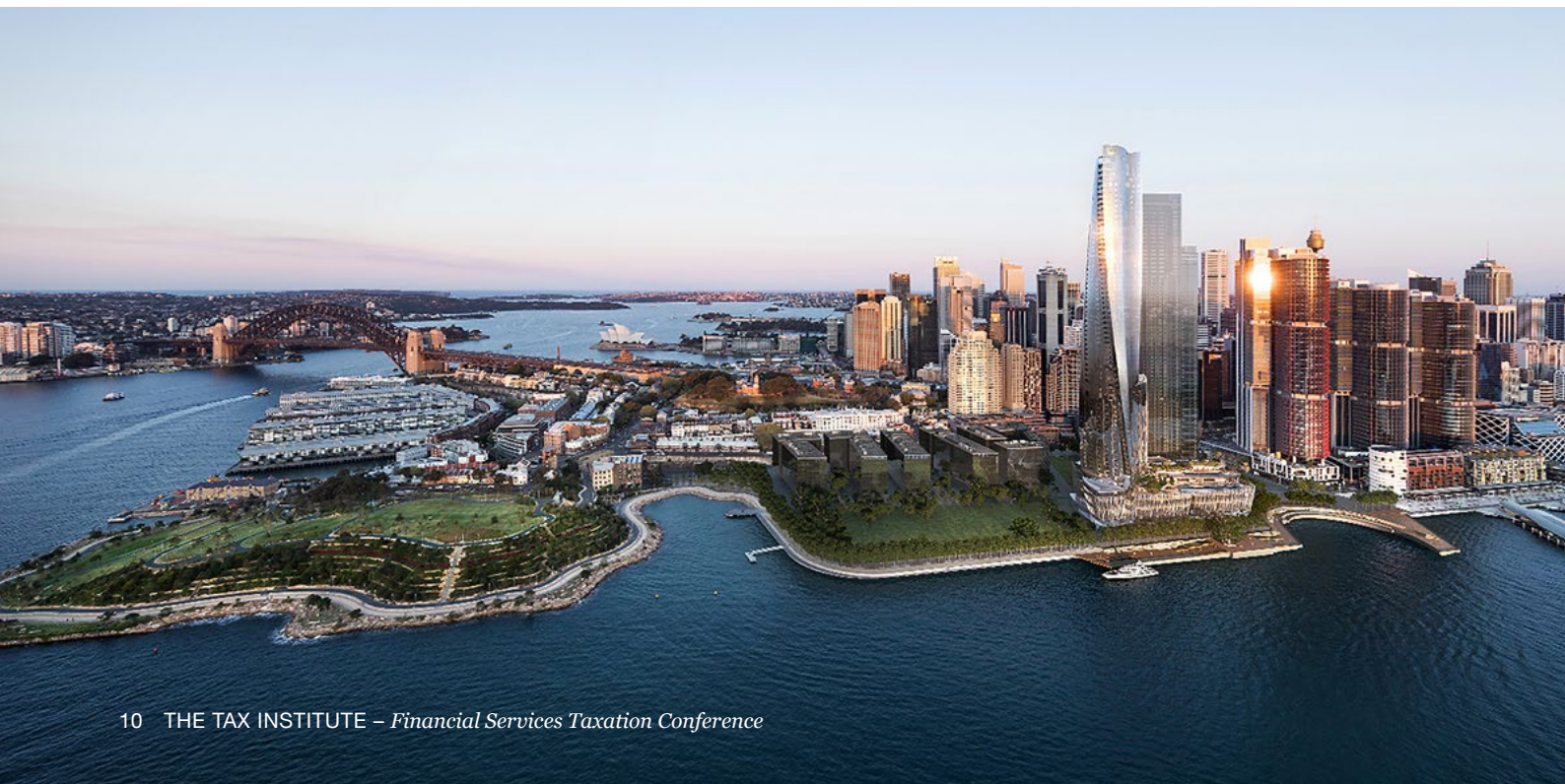
Peter Walmsley started his career with the ATO back in 1977 and is currently one of three Deputy Chief Tax Counsels. In Peter's current role, he provides technical and strategic guidance on many of the ATO's highest profile and most complex technical issues, legislative amendments and Federal and High Court litigation matters. Peter also chairs the ATO's Sydney General Anti-Avoidance Rules Panel and has previously chaired the Public Rulings Panel.

Steve Whittington is a senior associate at Ashurst. Steve advises on a wide range of tax matters, with a focus on funds, real estate acquisitions, mergers and acquisitions, and financial arrangements. His expertise in advising on the establishment of funds extends to commercial office, build to rent, hotels, logistics, retail, and infrastructure. Steve has practiced in both New Zealand and Australia and is admitted as a Barrister and Solicitor in the High Court of New Zealand.

Angela Wood, CTA, is a leading tax dispute resolution and litigation lawyer, bringing an exceptional track record of success over 20 years' dedicated practice in the field. She focuses on proactive, efficient and early resolution of disputes, advising multinational and large domestic corporates, private groups and high net wealth individuals. Angela advises clients at all stages of tax disputes, from early regulator engagement at transaction, through reviews, audits, independent review, GAAR panel and objections. Angela also has deep tax litigation experience,

having run significant Federal, State and High Court matters for both the Commissioner of Tax and for taxpayers. She is known for her strategic and practical advice, her depth of relationships with the ATO and ability to strike the right balance between robust representation for taxpayers and maintaining productive working relationships with revenue regulators to achieve the best results. Prior to joining Clayton Utz, Angela was both the National Lead Partner and ASPAC Regional Lead Partner for Tax Controversy at KPMG Law.

Peter Zorbas, CTA, is the Head of Tax at the Commonwealth Superannuation Corporation. Peter is a commercially focused and experienced tax professional with over 20 years' tax experience. Peter is a Chartered Accountant, Chartered Tax Adviser and is admitted as an Australian lawyer. Peter is experienced in Australian and international tax, tax risk governance, process automation and technology implementation. Prior to joining CSC in 2012, Peter was an Executive Director in EY's financial services tax practice.





Venue and accommodation



Crown Sydney

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

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 Crown Sydney. Accommodation bookings can be made by [clicking here](#) or 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 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 kilometres 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, Postpone 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.

In the case of a postponement of a face-to-face event which does not have an online element attached, the Tax Institute will provide a credit note which can be used for the same event or for a different event in the future.


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

 **Register online at** taxinstitute.com.au/financial-services

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 conference 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 conference

Early bird registration

All registrations received and paid on or before Friday, 11 February will be entitled to the early bird discount.

Group discounts

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

This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together.

For further information please contact the national events team on 1300 829 338 or nationalevents@taxinstitute.com.au.

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.

Hybrid event

As a hybrid face-to-face and online event, this event will be accessible to all delegates via our dedicated Delegate Portal.

Program information, materials (technical papers and presentations), evaluation forms and more will be available via The Tax Institute's virtual event platform. All delegates are encouraged to access the platform prior to the event.

Technical papers and PowerPoint presentations will be available on the portal to all participating delegates approximately five days before the event. Delegates will receive instructions on accessing the portal by email.

Special dietary and accessibility requirements

Please indicate any special dietary requirements on the registration form. Please email us with any accessibility requirements.

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 Conference.

Networking function – Thursday, 10 March 2022

The networking function will be held at Smoke on Thursday, 10 March, 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.

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 National Infrastructure Conference. 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.

COVID-19 Event Guidelines

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

Please click [here](#) for a summary of the measures The Tax Institute has put in place to ensure the safety of attendees at our face-to-face events, along with helpful links to assist you in preparing for your attendance at them.

Please note, final implementation of any of these measures is subject to Federal and State Government requirements at the time of each event.

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.

For further information regarding this event, please contact the National Events Team on 1300 829 338 or email

nationalevents@taxinstitute.com.au

For registration enquiries, please contact our customer admin team on 02 8223 0000 or email customeradmin@taxinstitute.com.au



THE TAX INSTITUTE

Financial Services Taxation Conference Registration form

42227 | 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
Early bird registration Register on or before Friday 11 February	<input type="checkbox"/> \$1,700	<input type="checkbox"/> \$2,040	<input type="checkbox"/> \$2,000
Standard registration Register after Friday 11 February	<input type="checkbox"/> \$1,900	<input type="checkbox"/> \$2,240	<input type="checkbox"/> \$2,200

Virtual – Full conference registration

	Member	New member*	Non-member
Early bird registration Register on or before Friday 11 February	<input type="checkbox"/> \$1,450	<input type="checkbox"/> \$1,790	<input type="checkbox"/> \$1,750
Standard registration Register after Friday 11 February	<input type="checkbox"/> \$1,650	<input type="checkbox"/> \$1,990	<input type="checkbox"/> \$1,950

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 2023
- 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.

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:

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) Date of birth:

First name: Last name:

Position: Company:

Address:

Suburb: State: Postcode:

Telephone: Fax:

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 Breakout session selection

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

Thursday, 10 March 2022

- 11.00am–12.00pm Session 3A Session 3B
- 12.00–1.00pm Session 4A Session 4B
- 3.30–4.30pm Session 6A Session 6B

Friday, 11 March 2022

- 10.00–11.00am Session 9A Session 9B

5 Cocktail function

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

Thursday, 10 March 2022

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.

Collection notice

The Tax Institute (TTI) complies with its obligations under the Privacy Act 1988 (Cth) with respect to how it handles personal information. For information on how TTI collects, uses, holds and discloses personal information, please see its privacy policy at www.taxinstitute.com.au. [You can also request TTI's consultants to provide you with a copy of TTI Privacy Policy.] By submitting your application to TTI, you confirm that you have read TTI's Privacy Policy and you consent to your personal information being collected, used and held by TTI and disclosed to third parties in accordance with TTI's Privacy Policy.

TO REGISTER

➤ Online taxinstitute.com.au/financial-services

@ Email 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

taxinstitute.com.au