



THE TAX INSTITUTE



Tax Disputes Masterclass

16 March 2022 | Establishment Hotel Sydney & Online

7 CPD hours

Welcome

Post-COVID, tax disputes are once again on the rise. The ATO is well-resourced, and assurance and audit programs are back in full swing. There remains significant uncertainty with regard to both relatively recent legislation and some traditional battle grounds such as the revenue capital distinction and Division 7A.

This program will provide both technical insights and practical tips for resolving tax disputes. The different perspectives of our wide variety of presenters, from senior ATO officers to members of the tax bar and experienced Tax Controversy professionals, will bring fresh thinking to the nuanced challenge of seeking to resolve a tax dispute.

A special thank you to the organising committee and our speakers for the time, energy and support they have contributed to ensuring that the Tax Disputes Masterclass maintains the high standards we have come to see from this event.

I look forward to seeing you in Sydney in person or virtually for what will be a truly exceptional event!



A handwritten signature in black ink, appearing to read 'Keith Swan'.

Keith Swan
Chair, Tax Disputes Masterclass

Early bird offer

Register on or before Friday, 18 February 2022 to save!

Technical Program

Day 1 Wednesday, 16 March 2022

Time	Session	Presenter
8:00 – 8:25am	Registration	
8:25 – 8:30am	Welcome and opening address	Keith Swan Chair – Tax Disputes Masterclass Organising Committee
8:30 – 9:30am	<p>Session 1: What does the ATO want to see in audits? – what is good evidence and what is not?</p> <p>The ATO have notified you and your client that they will audit your client’s tax affairs for the current year and last five years. The ATO’s data matching and hi-tech cross referencing against bank and other records identify discrepancies from over-calculating deductions, understatement of assessable income and questionable tax positions. This session will provide practical case studies to help you and your client navigate a tax audit with the ATO including:</p> <ul style="list-style-type: none"> • Filtering information in response to ATO questionnaire – what evidence should you provide to the ATO? • How do you protect your clients from contentious grey areas of tax law? What additional evidence should you and your client hold? • The good, bad and ugly war stories direct from our expert presenter 	Dr Bill Orow, CTA Victorian Bar
9:30 – 10:30am	<p>Session 2A: ATO and taxpayer cases that have led to a court case</p> <p>Disputes with the ATO are full of challenges, not least of which is understanding how the ATO views your client’s case. Do they think your client has a defensible legal argument? How much weight should be given to their evidence? And how important is this case, that only a full hearing on its merits is appropriate and in the public interest? Understanding these things can not only assist tax practitioners in advocating for their client but can also help narrow the issues in dispute between the parties, and potentially lead to an agreed resolution.</p> <p>In this session, we will hear insights from a senior ATO officer on their experience in tax disputes from the ATO perspective, including examples of cases that have gone to court, and how the ATO has balanced properly defending its position against its obligations under the Model Litigant rules.</p>	Fiona Dillon, CTA Australian Taxation Office
	<p>Session 2B: Negotiation Techniques for Tax and Non-Tax Situations</p> <p>The use of effective negotiation techniques and strategies can turn potentially long, protracted and adversarial disputes into effective win-win comprises. This presentation highlights some of the main and cutting edge negotiation-related strategies and principles – applying theory, practice and psychology – as it applies to both tax and non-tax matters in diverse business settings.</p>	Prof Jasper Kim University of Melbourne
10:30 – 11:00am	Morning tea	

Technical Program

Day 1 Wednesday, 16 March 2022

Time	Session	Presenter
11:00am-12:00pm	<p>Session 3A: Transfer Pricing and evidence</p> <p>In light of recent transfer pricing litigation, ATO review and audit activity and various guidance issued by the Commissioner, transfer pricing remains one of the most contentious areas of the tax law. Given that transfer pricing disputes are usually determined by the available evidence, this session focusses on the bespoke considerations of preparing lay and expert evidence in transfer pricing disputes.</p> <p>Our experts will consider the different considerations that arise in seeking to address the ATO's various practical compliance guidelines as well as meeting the taxpayer's burden of proof in court.</p>	<p>Glen Hutchings, FTI KPMG</p> <p>Martin Fry, FTI Allens</p> <p>Facilitator Justin Byrne, CTA QLD Bar</p>
	<p>OR</p> <p>Session 3B: Private wealth and common technical issues</p> <p>It is not only the big end of town that has tax disputes. A number of tax disputes involve businesses in the SME sector and high net wealth individuals, which give rise to differing, and in many cases more complex, issues. This session will provide alternate viewpoints on disputes involving private wealth and cover the following:</p> <ul style="list-style-type: none"> • The ATO Next 5,000 findings report • Disputes involving trusts, particularly 100A • Division 7A and the impact of disputes. 	<p>Louise Clarke Australian Taxation Office</p> <p>Todd Want, CTA William Buck</p>
12:00-1:00pm	<p>Session 4A: LPP in tax audits and disputes</p> <p>This session is intended to bring about awareness of the issues relating to privilege considerations and claims in tax reviews, audits and subsequent disputes. As part of those considerations, the session will also cover the ATO's current draft protocol on legal professional privilege including observations around the ATO's guidance and how that intersects with the application of this fundamental common law right.</p>	<p>Lisa Hespe SC Victorian Bar</p>
	<p>OR</p> <p>Session 4B: Advisor issues, negligence claims, promoter penalties, safe-harbour rules</p> <p>It has never been a more challenging time to be a taxation advisor. In this session we focus on the range of matters that must be considered in representing clients that have fallen foul of the law, including:</p> <ul style="list-style-type: none"> • Claims in negligence • Application of the promoter penalties • Tax agents' registration (deregistration) • Other considerations. 	<p>Chris Kinsella, CTA Holding Redlich</p> <p>Judy Sullivan, CTA Tax Practitioners Board</p>

Technical Program

Day 1 Wednesday, 16 March 2022

Time	Session	Presenter
1:00 – 2:00pm	Lunch	
2:00 – 3:00pm	<p>Session 5A: Declaratory relief – finally an alternative to Part IVC?</p> <p>Part IVC of the TAA 1953 provides a statutory framework for dissatisfied taxpayers to object against tax assessments. However, Part IVC is not the only avenue available.</p> <p>Declaratory relief pursuant to section 39B of the Judiciary Act 1903 is an alternative avenue which has long been available to taxpayers to move an appropriate dispute with the Commissioner into the Court for resolution.</p> <p>In the past, some matters have proceeded via declaratory relief where the Commissioner has consented to that course: <i>Sandini Pty Ltd v Commissioner of Taxation</i> [2017] FCA 287. Others have proceeded where the Commissioner does not consent or even opposes that path: <i>Oil Basins Ltd v Commonwealth</i> (19930 178 CLR 643) and most recently <i>ASZ21 v Commissioner of Taxation</i> [2021] FCA 1304.</p> <p>In this session, Gareth Redenbach, counsel for the applicant in ASZ21, will discuss:</p> <ul style="list-style-type: none"> • What can be achieved via declaratory relief • When it may be appropriate or not appropriate • The relevant benefits to taxpayers and the Commissioner • What to practically expect if declaratory relief is sought. 	Gareth Redenbach, CTA Victorian Bar
OR	<p>Session 5B: Early engagement with the ATO</p> <p>It is always preferable for both taxpayers and the ATO to engage in early conversations with the common goal of resolving uncertainty arising in tax matters.</p> <p>This session will cover the key considerations and benefits of proactively engaging with the ATO to such resolve issues. Discussion will focus on the various ways taxpayers can engage with the ATO throughout the course of a review or audit, including</p> <ul style="list-style-type: none"> • Use of voluntary disclosures, • Assessing a taxpayer’s assurance level prior to a Combined Assurance Review or Top 500 Review • The ATO’s New Investment Engagement Service program • What it seeks to achieve. 	Sandra Farhat, FTI EY Nadia Alfonsi Australian Taxation Office
3:00 – 3:30pm	Afternoon Tea	

Technical Program

Day 1 Wednesday, 16 March 2022

Time	Session	Presenter
3:30–4:30pm	<p>Session 6: In-house perspective in dealing with ATO reviews and audits</p> <p>Hear from a panel of experienced in-house advisors who will consider the challenges of managing an ATO review or audit from the in-house perspective, including a discussion about:</p> <ul style="list-style-type: none">• The in-house advisor’s role and their interaction with key stakeholders• Who are decision makers and what factors influence key decisions• Challenges in identifying and documenting factors that underpin commercial decision-making• Key considerations when selecting external advisors; and• An in-house perspective on seeking resolution of a dispute.	<p>Catherine Feng Origin Energy</p> <p>Chris Merjane, FTI ResMed</p> <p>Shashi Sivayoganathan Transurban</p> <p>Facilitator: Kathryn Bertram, FTI Johnson Winter & Slattery</p>
4:30–5:30pm	<p>Session 7: Alternative dispute resolution options: how to resolve a tax dispute</p> <p>Tax litigation is expensive and the outcome is often uncertain. The tax dispute lifecycle inherently provides various opportunities for resolution. In order to make the most of these opportunities it is important to have an understanding of the available options, the pros and cons of each option and timing. These options include an informal settlement meeting, the ATO’s in-house facilitation process, a mediation with an external mediator and early neutral evaluation. In international tax matters the mutual agreement procedure and the binding arbitration mechanism may also be worth considering.</p> <p>Alternative dispute resolution with the ATO requires an understanding of its processes, limitations and drivers. In order to resolve a tax dispute a different approach is required. Our experienced panel will explore the various options and provide practical guidance on the best approach to resolve a tax dispute prior to litigation.</p>	<p>Ram Pandey Australian Taxation Office</p> <p>Jeremy Geale, CTA MinterEllison</p> <p>Michael Cosgrove NSW Bar</p> <p>Facilitator Renata Saini Deloitte Legal</p>

Presenters

Nadia Alfonsi is Assistant Commissioner in Public Groups and International (PG&I) at the ATO. As part of her role, Nadia has responsibility for the Investment Industry Strategy and is also responsible for PG&I Engagement and Assurance teams in Parramatta 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.

Kathryn Bertram, FTI, is a Partner in the tax team at Johnson Winter & Slattery where she practises in tax controversy (advising clients on all aspects of tax disputes including reviews, audits, ADR and litigation) and state taxes (including transfer duty, landholder duty and land tax). She is a member of The Tax Institute's National and Victorian Women in Tax committees, the Law Institute of Victoria's State Taxes Committee and the LIV/SRO Liaison Committee.

Justin Byrne, CTA, went to the Queensland Bar 3 years ago after more than 20 years practising as a solicitor specialising in taxation and revenue law. He advises on a wide range of complex taxation issues, including income tax, CGT, GST, payroll tax and stamp duty. He has qualifications and extensive experience in both law and accounting

and is uniquely placed to provide practical and commercial tax solutions for clients. He is also experienced in negotiating with the ATO in relation to tax disputes and has conducted tax litigation in the Administrative Appeals Tribunal, Federal Court, High Court and State Courts.

Louise Clarke commenced her role as Deputy Commissioner, Private Wealth, on 23 August 2021. Prior to that Louise was the ATO's Deputy Commissioner for Policy, Analysis and Legislation. Louise has worked for the ATO for over 25 years and has held senior roles in Public Groups & International and Tax Counsel Network where she has had extensive experience leading work on new law design, strategic litigation, public and private advice and audits.

Michael Cosgrove is a barrister at the New South Wales Bar. Michael primarily practises in taxation law, particularly federal taxation law. Michael has around fourteen years of experience that is primarily in tax, including six years as a barrister practising from New Chambers. Michael has experience in relation to a wide range of federal income tax issues, including international tax issues. Michael acts for taxpayers and the Commissioner of Taxation.

Fiona Dillon, CTA, is the Chief Tax Counsel at the ATO. In this role, Fiona leads the resolution of the ATO's most significant tax technical issues. Working

predominantly in technical roles prior to this, Fiona has helped shape the strategic direction of the ATO's Public Advice and Guidance, was a longstanding member of the ATO's Public Ruling Panel and a member of the ATO's General anti-avoidance rule Panel; as well as spending a number of years in private practice. For almost two years prior to her promotion to Deputy Commissioner Tax Counsel Network, Fiona served as Minister-Counsellor (Taxation) in the Australian delegation to the OECD based in Paris. In that role, she chaired the Joint International Taskforce on Information Sharing and Collaboration (JITSIC) on behalf of the Commissioner and represented Australia in other OECD taxation initiatives. Fiona is an admitted Australian legal tax practitioner and holds a Bachelor of Commerce, Bachelor of Laws with Honours and a Masters of Taxation. Earlier this year, in its recognition of 100 years of woman in tax, IFA named Fiona in its 68 leading woman in international tax globally.

Sandra Farhat, FTI, recently joined EY as a Partner in the Tax Controversy and Policy group after a 20-year career at the Australian Taxation Office. She brings a wealth of experience in managing ATO engagements across all key tax areas with a specialisation and focus on transfer pricing and international tax issues. She has a deep understanding of the ATO's engagement and assurance

approach and life cycle for public groups and multinational groups. She has led the conduct and resolution of complex tax matters and worked openly and collaboratively to achieve mutually agreeable outcomes. Her experience in dispute resolution includes the largest disputes across the digital economy and life sciences industry, and disputes covering related party financing, structuring and transfer pricing.

Catherine Feng is a Senior Tax Manager at Origin Energy and has over 12 years' experience with a focus on corporate tax, mergers and acquisitions and tax dispute resolution. In her current role, Catherine has been extensively involved in managing interactions with the Australian Taxation Office (ATO) including early engagement, rulings, risk reviews and justified trust assurance reviews. Recent achievements include Origin Energy obtaining high assurance for income tax for the 2017- and 2018-income years under the ATO justified trust program and maintaining this level of assurance for the subsequent two years. Catherine was formerly a lawyer at a top-tier law firm representing multinationals and high wealth individuals on reviews and audits with the ATO and state revenue authorities. She has a Master of Laws specialising in Tax and is admitted as a solicitor of the Supreme Court of NSW and the High Court.

Presenters

Martin Fry, FTI, is the Practice Leader of the Allens Tax Group. With over 20 years as a Partner of Allens, Martin advises corporations on a broad range of tax issues across a wide range of sectors, including resources, infrastructure, financial services and IP-intensive businesses. In recent years, Martin has focused on contentious transfer pricing matters, including audits, settlement negotiations, mutual agreement procedure and litigation. Martin has taught Corporate Tax at a postgraduate level at the University of Melbourne.

Jeremy Geale, CTA, is a Partner at MinterEllison. Jeremy joined MinterEllison recently, having previously been a Deputy Commissioner with the ATO responsible for the ATO's Review and Dispute Resolution area, covering all objections and litigation. Jeremy has more than 20 years tax experience, most of which has been spent assisting taxpayers and the ATO to resolve complex tax disputes from audit through to litigation.

Lisa Hespe SC is a Senior Counsel at the Victorian Bar specialising in taxation. She has appeared for taxpayers and the Commissioner of Taxation in income tax cases in the Administrative Appeals Tribunal, the Federal Court and the High Court of Australia. She is a part time member of the Administrative Appeals

Tribunal and is a senior fellow at the University of Melbourne, co-lecturing in the Melbourne Law Masters subject Tax Litigation.

Glen Hutchings, FTI, is a Partner in KPMG's International Tax Advisory group based in Sydney. He specialises in transfer pricing and tax structuring into Australia and has over 22 years of international tax experience. Glen has assisted taxpayers seek APAs, resolve disputes and enter into mutual agreement procedures with the ATO. He joined KPMG from the ATO where he held the position of Assistant Commissioner, International Compliance, International Structuring and Profit Shifting (ISAPS) & Transfer Pricing Strategy. As an Assistant Commissioner, he was a competent authority and also responsible for leading three international strategic risk areas: e-commerce, pharmaceuticals and leasing. Prior to joining the ATO, Glen was an adviser with Big 4 accounting firms as a transfer pricing specialist including 3 years in the UK as a supply chain specialist.

Prof. Jasper Kim is a scholar, US-licensed lawyer and consultant with expertise in negotiations and persuasion principles. He is a Senior Fellow at the University of Melbourne and Director of the Center for Conflict Management at Ewha University in Seoul. He served as invited faculty

for the Supreme Court of Korea and is an Arbitrator for the Korea Commercial Arbitration Board. He was also a visiting scholar at Harvard Law School and Stanford University. Previously, he held key positions in fixed-income and structured products with Barclays Capital, Credit Suisse and Lehman Brothers. He received a MSc degree from the London School of Economics, a JD from Rutgers Law School, a MBA from the University of London and MSc in Taxation from Christ Church, University of Oxford (Faculty of Law and Said Business School).

Chris Kinsella, CTA, is a tax partner based in Sydney with the law firm Holding Redlich. Chris has over 30 years' experience advising clients in relation to tax matters, particularly early ATO engagement, ATO access powers, tax audits, tax litigation and dispute resolution. Chris has acted for clients in banking/insurance, property/infrastructure, pharma, mining/energy, manufacturing and professional services. The Holding Redlich tax controversy team represents taxpayers (and their advisors) in tax disputes in both the Federal Court and the AAT. Focus areas include anti-avoidance, transfer pricing and international tax. Notable cases that Chris has been involved with include the Chevron transfer pricing case and the

Resource Capital Fund tax cases. Recent topics receiving attention from clients also include legal professional privilege, promoter penalties and the ATO's broader attitude to tax advisers more generally. Chris is the chair of the Tax Institute's Dispute Resolution Committee and the chair of the Number One Tax Discussion Group. Chris is accredited in dispute resolution with the NSW Law Society.

Chris Merjane, FTI, is a Tax Counsel at ResMed. He provides tax law advice regarding global audits, M&A and litigation. Recently, Chris led ResMed through information requests, litigation preparation and settlement workstreams in respect of its dispute with the ATO. Chris previously worked at Gilbert + Tobin and PwC.

Bill Orow, CTA, is an expert in the fields of trusts, taxation and superannuation law. He holds a Ph.D as well as an LL.M and has had many written works on taxation published. He practices in Federal and State taxation and superannuation law and has been briefed in matters involving income taxation, GST, superannuation, stamp duty and land tax. In addition, Bill has an extensive practice in trusts law including trust disputes and restructure. Bill is an accredited mediator.

Presenters

Ram Pandey is a principal lawyer in Review and Dispute Resolution in the ATO. Ram has been with the ATO for over 15 years working on tax appeals in the AAT and Federal Court. Prior to joining the ATO, Ram worked as a lawyer with Jones Day LLP in their corporate practice and before that at KPMG as a tax consultant. Ram has degrees in economics and law from the University of Sydney, a Masters of Law from the University of Sydney and a Certificate in American Law from UC Berkeley.

Gareth Redenbach, CTA, Gareth is a barrister practising in revenue law and has over 15 years of experience in tax matters. He has advocated in all trial divisions in Victoria as well as in the High Court, Full Federal Court and Victorian Court of Appeal. He has appeared for both taxpayers and the Commissioner and including for the successful taxpayer in the Full Federal Court decision on taxation of trusts in *Lewski v Commissioner of Taxation* (2017) 254 FCR 145, for the successful Commissioner in the first domicile case decided post-Harding (*Handsley v Commissioner of Taxation* [2019] AATA 917) and for the successful taxpayer in the anti-avoidance case *STNK v Commissioner of Taxation* [2021] AATA 3399 and in the recent Federal Court decision relating to declaratory relief in *ASZ21 v Commissioner of Taxation* [2021]

FCA 1304 (both unled). Prior to joining the bar, Gareth was in-house counsel for the Macquarie Group based in New York responsible for managing transfer pricing and international tax matters across the Americas region.

Renata Saini is a Managing Associate of Deloitte Legal. Renata specialises in tax controversy where she provides legal and strategic advice in relation to the resolution of taxation disputes at various stages, ranging from commencement of risk reviews and audits by the ATO, objecting against Assessments, discussing settlement options or alternative dispute resolution, through to appealing to the AAT, Federal Court and Full Federal Court. Renata has over 18 years' experience advising multinationals and private clients on taxation matters across a broad range of industries. Early in her career Renata spent 5 years with the Australian Government Solicitor litigating on behalf of the Commissioner of Taxation.

Shashi Sivayoganathan is a General Counsel of Tax at Transurban and a consultant at Deloitte. He was a former partner at Deloitte Lawyers. He has over 20 years of tax experience, specialising in infrastructure, merger and acquisitions, privatisations, tax-based financing and

consolidations. Shashi has significant experience in public/private investment in infrastructure and greenfield infrastructure projects. In addition to his experience in infrastructure, Shashi also has extensive experience in tax audits and tax litigation. Public/private investment in infrastructure and greenfield infrastructure projects. In addition to his experience in infrastructure, Shashi also has extensive experience in tax audits and tax litigation.

Judy Sullivan,CTA, is Principal Solicitor at Judy Sullivan Consulting Pty Ltd. From 2013 to 2020 she was a tax partner at PwC in Sydney. Prior to this she was a tax partner at King & Wood Mallesons in Sydney, and a senior tax lawyer at Mallesons Stephen Jaques, Gilbert & Tobin and Ernst & Young. She has been a member of committees and working groups for the Law Council of Australia and the Australian Taxation Office, on the Advisory Committee to the Board of Taxation, and Deputy Chair of the ACT Gambling & Racing Commission. Judy holds degrees in Economics and Law from the Australian National University and a Master of Laws from the University of Sydney. Judy was appointed to the Board in October 2020.

Keith Swan is a partner of KPMG Law's Tax Dispute Resolution &

Controversy team. He has over 17 years' experience specialising in tax disputes and litigation. Keith's experience includes managing ATO and State Revenue reviews and audits, negotiating favourable settlements, and working with a range of leading tax counsel in litigating matters against the Commissioner of Taxation and State Revenue authorities. Keith has also resolved disputes by way of the various alternative dispute resolution mechanisms that are available in tax matters. His clients have included large multinationals, small to medium enterprises and high net wealth individuals. Keith was admitted as a solicitor in NSW in May 2005, is a member of the Law Society of NSW and holds a Master of Taxation from Sydney University.

Todd Want, CTA, is a Director in the Tax Services division at William Buck in Sydney, where he specialises in small-to-medium enterprise tax matters. Todd advises his clients on a broad range of tax issues, while he also provides specialist consulting services to accountants, lawyers, financial planners and other professionals in public practice to assist them in advising their clients. Todd is also a regular presenter for The Tax Institute at various conferences and events.

Venue and accommodation

Establishment Hotel Sydney

5 Bridge Ln, Sydney NSW 2000

Establishment Hotel is located centrally in Sydney CBD. Approximately a 6-minute walk from Wynyard station, Establishment is easily accessible by bus, light rail or train.

Parking

There is no on-premises parking. However, you can save up to 10% off Secure Parking when booking through Merivale. For more information visit merivale.com/secureparking.

Accommodation

Favourable room rates have been negotiated and secured at Establishment Hotel Sydney. [Click here](#) for more information.

Delegates interested in booking a stay at Establishment Hotel for the duration of the conference can do so by calling the hotel directly on 02 9240 3100. Please indicate to hotel staff that you are attending The Tax Institute's Tax Disputes Conference to receive a 10% discount on the best available rate at the time of booking. Alternatively, book accommodation online at merivale.com/stay/establishmenthotel, online rates as at the time of booking.

Please read the hotel's terms and conditions prior to booking. All additional hotel incidentals, including breakfast, remain the responsibility of delegates, and individuals will be responsible for payment of the balance of their account when checking out of the hotel. Please note that extra charges may be incurred for additional guests and will be charged to individual room accounts upon checkout.



Event information

In person registration inclusions

- Participation in the full technical program
- Electronic access to technical materials prior to the masterclass and on-demand recordings
- Lunch and refreshment break during the masterclass

Please note: The registration fee does not include accommodation, hotel incidentals or transfers.

Online registration inclusions

- Participation in the full technical program via live-stream or on-demand recordings
- Electronic access to technical materials prior to the masterclass

Early bird registration

All registrations received and paid on or before Friday, 18 February 2022 will be entitled to an early bird discount.

Group Discounts

Purchase three full registrations (early bird or standard) and receive a fourth full registration free. The free registration must be of equal or lesser 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.

The Tax Institute Attendee Hub

Program information, materials (technical papers and presentations), survey forms and more will be available via The Tax Institute's virtual Attendee Hub for in person and online attendees. All delegates are encouraged to review the event materials and familiarise themselves with the Attendee Hub prior to the event.

Dress code

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

Delegate list

To assist with networking, a delegate list will be available within the virtual Attendee Hub.

Please indicate at the time of registration if you do not want your name to be included. Alternatively, you can edit your profile visibility settings in the virtual Attendee Hub at any time during the event.



Event information

Continuing Professional Development

Attendance at the event counts for 7 hours of Continuing Professional Development with The Tax Institute.

Confirmation of registration

You will receive two separate emails in the form of a registration confirmation and tax invoice at the time of payment and registration completion.

Special dietary and accessibility requirements

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

COVID-19 Event Guidelines

At The Tax Institute, the health and wellbeing of our members, delegates and employees is our top priority. Whilst returning to in person, 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. For more information visit <https://www.taxinstitute.com.au/professional-development/covid-19-event-guidelines>

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, Privacy Policy.

We recommend for the health and safety of our presenters, delegates and staff that they consider vaccination. We work closely with venues throughout Australia and in accordance with their COVID-19 safety plans. Whilst some of them continue to develop and amend these in accordance with their own State government guidelines, in the immediate short term we expect that the majority of venues will require proof of vaccination on entry to their premises. For those not able to or willing to participate at in person events, we recommend they consider attending via our online attendance option.

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 in person 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 in person 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.

Enquiries

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

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

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 registration | 42255

	Member	New member*	Non-member
Early bird registration Received on or before 18 February 2022	<input type="checkbox"/> \$900	<input type="checkbox"/> \$1,240	<input type="checkbox"/> \$1,200
Standard registration Received after 18 February 2022	<input type="checkbox"/> \$1,100	<input type="checkbox"/> \$1,440	<input type="checkbox"/> \$1,400

Virtual – Full registration | 42256

	Member	New member*	Non-member
Early bird registration Received on or before 18 February 2022	<input type="checkbox"/> \$750	<input type="checkbox"/> \$1,090	<input type="checkbox"/> \$1,050
Standard registration Received after 18 February 2022	<input type="checkbox"/> \$950	<input type="checkbox"/> \$1,290	<input type="checkbox"/> \$1,250

I acknowledge that I will receive electronic access to the available papers and presentations through The Tax Institute Attendee hub.

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

Member no.:

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

Title: Mr Mrs Miss Ms

Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb:

State:

Postcode:

Telephone:

Mobile:

Email:

Dietary requirements:

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

3 Technical sessions options

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

9.30–10.30am

Session 2A

Session 2B

11.00am–12.00pm

Session 3A

Session 3B

12.00–1.00pm

Session 4A

Session 4B

2.00–3.00pm

Session 5A

Session 5B

4 Payment summary

Forum registration

\$

Total payable

\$

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

5 Payment method

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

Cheque payable to The Tax Institute (in Australian dollars)

Credit card Card type: AMEX Visa MasterCard Diners

Name on card:

Card no.:

Expiry date:

Cardholder's
signature:

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

Membership and education program promotion

I am interested in becoming a member of The Tax Institute. Please send me further details.

I am interested in learning more about The Tax Institute's education program. Please contact me.

Marketing and business alliance partner exclusions


I no longer wish to provide my contact details to The Tax Institute's contracted business partners.


I no longer wish to receive marketing correspondence from The Tax Institute.

We take your privacy seriously, and our policy can be viewed at taxinstitute.com.au/go/footer/privacy.

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

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

 **Email**
customeradmin@taxinstitute.com.au

 **Fax**
02 8223 0077



THE TAX INSTITUTE

Thank you

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

Keith Swan, KPMG Law
(Chair, Organising Committee)

Kathryn Bertram, FTI, Johnson Winter & Slattery

Nick Gangemi, CTA, Sparke Helmore Lawyers

Mark Gioskos, FTI, Thomson Geer Lawyers

Andrew Howell, PwC

Luke Imbriano, FTI, Deloitte

Alex Mossman, Australian Taxation Office

Dioni Perera, FTI, EY

Renata Saini, Deloitte Legal

Shashi Sivayoganathan, Transurban

Lisa To, CTA, Bartier Perry

L37, 100 Miller Street
North Sydney NSW 2060

Tel 1300 829 338

Fax 02 8223 0077

For information, please contact National events team
at nationalevents@taxinstitute.com.au

taxinstitute.com.au