

Australia Tax and Finance Week – Tax Risk Management and Dispute Resolution in Australia



Faculty Directors from KPMG Australia



Peter Murray
Tax Partner



David E Drummond
Corporate Tax Partner



Sarah Dunn
Tax Partner



Grant Wardell- Johnson
Corporate Tax Partner



Jeremy Geale
Tax Law Partner

Australia Tax and Finance Week – Tax Risk Management and Dispute Resolution in Australia

FACULTY DIRECTORS



Peter Murray

Tax Partner

KPMG Australia

- *Leading Tax Practitioner with over 30 years of professional experience*
- *Extensive experience in advising large national and multinational corporations on domestic and cross border transactions, Risk Reviews, Audit and Litigation*
- *Previous President of the Tax Institute, the premier Australian tax industry body*

Peter Murray specialises in tax management and tax law, with a significant experience in M&A transactions, global capital markets and tax disputes, predominantly with large multi-national companies.

Along with strong links to Asia, Peter provides expertise within a range of sectors, specialising in energy, oil & gas, property, financial services, professional services distribution and manufacturing.

Peter is a Past President of The Tax Institute (2011), the premier Australian tax industry body, which has highly developed relationships with key industry leaders, Government and Revenue Authorities.



David E Drummond

Corporate Tax Partner

KPMG Australia

- *20 years of corporate tax experience with Australian listed companies and local subsidiaries of multinationals*
- *Tax Adviser for over 25 years, with extensive experience in managing ATO Risk Reviews and Audits*
- *Responsible for the ATO Annual Compliance Programme since its inception in 2002*

David Drummond has over 20 years' corporate tax experience with Australian listed companies and local subsidiaries of multinationals. He has had extensive experience in managing ATO Risk Reviews and Audits on behalf of clients during his 25 years as a tax adviser.

As a National Leader of Tax Management Services ("TMS") in KPMG Australia, David has liaised regularly on behalf of KPMG with the Senior Executive Officers of the Australian Taxation Office (ATO) responsible for the ATO Annual Compliance Programme since its inception in 2002. He has also been requested to participate on Advisory Panels by the Inspector General of Taxation in his review into Large ATO Audit and Risk Review Activity and IGT's review into the ATO's \$100M - \$250M turnover SME and High Net-Worth Individual audits and risk reviews.

David has been invited by the ATO to participate on the NTLG Working Group in relation to the piloting in FY 2012 of the Reportable Tax Position Schedule for Large Business Tax Payers. He has worked extensively with Advisory practice to develop an Enterprise Risk Management based response to the increasing focus by the ATO on Tax Risk Management and Corporate Governance Frameworks having regard to proposed changes to accounting standards governing accounting for tax uncertainties.

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Sarah Dunn

Tax Partner

KPMG Australia

- *Leading tax and litigation practitioner with over 20 years of professional experience*
- *Recognised in the AFR Best Lawyers Guide as a leading practitioner in Litigation and Tax*
- *Acted for clients in a large number of matters in the Federal Court of Australia, the Supreme Court of New South Wales and various tribunals*

Sarah Dunn is a Partner of KPMG Tax Law, KPMG's tax legal practice where she specialises in assisting clients to prevent, manage and resolve revenue disputes. She has been recognised in the AFR Best Lawyers Guide as a leading practitioner in Litigation and Tax and is a Fellow of the Taxation Institute of Australia.

Sarah has over 20 years' commercial litigation experience. Prior to joining KPMG Tax Law, Sarah was a Partner of Freehills (now Herbert Smith Freehills) in their Commercial Litigation Practice Group for over 11 years. At Freehills, Sarah acted for clients in a wide range of disputes across tax, contract and corporations law and in respect of various regulatory reviews and investigations. She has acted for clients in a large number of matters in the Federal Court of Australia, the Supreme Court of New South Wales and various tribunals.

Sarah has extensive experience in dealing with revenue authorities and advising clients at all stages of tax disputes including risk reviews, information requests/demands, audits, objections, GAAR Panel, settlement discussions and contested proceedings.

She has enjoyed considerable success in successfully resolving a large number of significant revenue disputes outside of the court processes (principally for clients in the financial services, energy and resources and media sectors) including transfer pricing and state revenue disputes and matters where the Commissioner has sought to apply Part IVA.



Grant Wardell- Johnson

Corporate Tax Partner

KPMG Australia

- *More than 20 years of experience in corporate taxation and structured finance both in Australia and internationally*
- *Advised multinational corporations in Australia on cross-border acquisitions and international and domestic tax structuring*

Grant Johnson has more than 20 years of experience in corporate taxation and structured finance both in Australia and internationally. He has held a number of senior positions within KPMG and currently leads a team of KPMG tax specialists to assist clients in managing the implications of Australia's Carbon Pricing Mechanism. Grant has been a Partner in KPMG's Corporate Tax practice for more than a decade and, in that time, has led a number of high profile IPOs, acquisitions and transactions for major multinational organisations.

Grant specialties include Taxation Issues, Industrial Markets, Infrastructure, Climate Change, IPOs, Mergers and Acquisitions, International and Domestic Tax Structures.

Australia Tax and Finance Week – Tax Risk Management and Dispute Resolution in Australia



Jeremy Geale

Tax Law Partner
KPMG Australia

- Leads KPMG's Tax Dispute, Management and Resolution Practice
- An external consultant to the ATO's ruling panel
- Frequently invited as a speaker at conferences or seminars on tax related issues
- Lecturer for the Taxation Institute of Australia in their applied tax program

Jeremy Geale leads KPMG's Tax Dispute, Management and Resolution Practice and a member of KPMG Global Steering Group. He is a partner of KPMG and KPMG Tax Law, helping clients prevent, manage and resolve disputes. He also advises clients with respect to indirect tax issues.

Prior to rejoining KPMG, Jeremy was at the Bar, specialising in tax. He has appeared in a wide variety of taxation matters from the AAT through to the High Court. Whilst he advises client across all aspects of tax law, he has a particular interest in GST and has appeared as counsel in many of the leading Australian GST cases including Qantas, Department of Transport and Luxottica. Jeremy is also an external consultant to the ATO's ruling panel.

Jeremy brings to his practice strong commercial experience, having worked for several years in-house as a tax manager at Qantas Airways, as well as KPMG and Coopers & Lybrand (now PriceWaterhouseCoopers). Drawing upon his commercial experience, Jeremy offers clients a detailed knowledge of the law combined with an appreciation and understanding of the commercial and accounting issues impacting any matter.

Jeremy is a regular presenter at tax events, and recent papers include 'GST for Lawyers' and 'GST - Enforcement and Compliance'. He is also an occasional lecturer for the Taxation Institute of Australia in their applied tax programme, lecturing in topics such as ethics, superannuation, GST and FBT.

EXECUTIVE SUMMARY

Programme:	Australia Tax and Finance Week – Tax Risk Management and Dispute Resolution in Australia	Early Bird 1 (Register & pay by 26 August 2014):	AUD 2,595
		Early Bird 2 (Register & pay by 23 September 2014):	AUD 2,795
		Regular Tuition Fee:	AUD 2,895
Dates:	21 - 22 October 2014 (2 days programme)	Group discount of 10% for 2nd participants from the same organisation. For limited time only by 23 September 2014, registration for 3 participants, the 4th participant will receive a complimentary seat (one discount scheme apply).	
Location:	Shangri-La Hotel, Sydney		

Australia Tax and Finance Week – Tax Risk Management and Dispute Resolution in Australia

Programme	Managing tax risk effectively is higher on the agenda for organisations in Australia than ever before.
Essence:	Due to increasing audit, scrutiny and investigation by Australia Tax Office (ATO) and State Taxation Authorities on tax compliance, it is essential for companies to start formulating and implementing effective tax risk and dispute management strategies. In this intensive two-day programme, participants will gain an in-depth knowledge on the overall tax risk management framework and dispute resolution strategies in Australia . Led by senior Tax Partners from KPMG with more than 20 years of corporate tax experience with Australian listed companies and local subsidiaries of multinationals, this executive programme will also show you the best practices to manage tax risk in a day to day operation, structure an in-house tax group effectively, and how to handle tax disputes when they occur. In addition, you will also learn current Australian Tax Authorities focus areas, which will help you to manage your tax exposures arising from your transactions, accounting, and audit. Throughout the programme, you will be involved in several case studies discussions drawn from actual cases to maximise the learning benefits and also to help you leave with specific actions steps for resolving current and future challenges.

PROGRAMME OVERVIEW

In recent times, due to active audit, review and investigation by Australia Tax Office (ATO) and State Taxation Authorities, the tax compliance burden on organisations in Australia has been increasing. The ATO's new risk-based approach to risk profiling means a greater level of scrutiny for taxpayers. This creates a drain on resources and leads to additional tax compliance costs at a time when tax departments are being asked to do more with less resources. Therefore, it is essential for organisations to be proactively aware of the tax obligations that they face in day to day operations. Having in place robust tax risk identification and management framework is a good approach to reduce your company's tax risk profile with the ATO while at the same time you can also free up resources and implement safeguards which reduce the exposure to costly litigation and non-compliance penalties.

Designed for finance and tax professionals, this intensive two-day programme will provide participants with an **in-depth knowledge on the overall tax risk management framework in Australia**. You will discover **current Australian Tax Authorities focus area** and be equipped with **practical knowledge on how to deal with the tax risks arising from your transactions, accounting, and audit**. You will also learn **effective ways to structure an in-house tax group** as well as to **handle tax disputes when they occur**. In addition, you will also hear the **latest tax highlights, which will help you to minimize your tax exposures**. Throughout the programme, you will be involved in several case studies discussions drawn from actual cases to maximise the learning benefits and also to help you leave with specific actions steps for resolving current and future challenges.

At the end of the programme, participants will gain the **latest updates on Australia's Tax legislation** and will be armed with practical skills to effectively **identify and manage tax risks to create values in your organisation**.

Programme Details

WHO WILL BENEFIT THE MOST

This executive programme is designed for Managers, Directors, and Heads of Departments dealing with Finance, Tax, Risk, and Strategic Planning. This programme is also applicable to Tax Lawyers, Tax Authorities, Accountants, Actuarial Head, Asset Liability Managers, Corporate Treasurers, Chief Operating Officer, Chief Compliance Officers, Financial Controller, and Internal and External Auditors.

LEARNING OBJECTIVES

- Understand Australia's tax landscape and Focus areas of Australian Tax Authorities
- Discover the tax compliance process in Australia
- Find out how to structure an in-house tax group through the use of external advisers
- Learn how to minimise tax risks and exposures arising from your tax transactions, accounting, and audit
- Understand alternative forms of dispute resolution techniques and effective ways to handle any potential tax disputes without violating the law
- Tackle the ATO's General Anti-Avoidance Review panel in response to anti-avoidance matters
- Be involved in real case studies discussions to maximise your learning benefits

PROGRAMME OUTLINE

DAY ONE - MORNING

Current Australian Tax Landscape

- Focus Areas of Australian Revenue Authorities
 - ✓ ATO's Risk Differentiation Framework
 - ✓ Transfer Pricing
 - ✓ Base Erosion and Profit Sharing

Best Practices to Manage Tax Risk within Organisations

- Day to Day Operations
- High-Value / Complex transactions
- Mergers & Acquisitions activity

Structuring an in house tax group

- How to best use external advisers (Including Legal Professional Privilege and Accountants' Concession)

DAY ONE - AFTERNOON

Tax Compliance

- Process in Australia
 - ✓ Offshore Resources and data warehousing

Programme Outline & Agenda

DAY TWO - MORNING

Tax Positions

- ✓ Getting certainty on tax positions taken
- ✓ Obligations of directors
- ✓ Reporting to the Board and CFO
- ✓ Assertions
- ✓ Evidence and supporting material

DAY TWO - AFTERNOON

The Role of the General Anti-Avoidance Rule (GAAR)

Revenue Authority Processes

- Particular emphasis on the ATO
- Client Risk Review
- Audit and information collection ("Including Legal Professional Privilege and Accountants" Concession)
- Position Paper
- Independent Review
- Assessments

ADR

- What is ADR
- How to best use it

Litigation Process

- Objection
- Appeal
- Other options that exist

REGISTRATION PAGE

Booking Contact (Approving Manager) Mr/Mrs/Ms: _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____
Organisation: _____
Address: _____
Postal Code: _____
☐ I would like to receive more information on hotel accommodation using Clariden Global corporate rate.

Please Register the following participant(s) for this Programme:

1st Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
2nd Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
3rd Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
4th Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____

PROGRAMME FEES

- ☐ **1ST EARLY BIRD FEE: AUD 2,595**
(Registration and payment must be received by 26 August 2014)
- ☐ **2ND EARLY BIRD FEE: AUD 2,795**
(Registration and payment must be received by 23 September 2014)
- ☐ **REGULAR FEE: AUD 2,895**
- ☐ **GROUP DISCOUNT:** For 2 registrations from the same company and billing source, the 2nd participant enjoys a 10% discount.

For registrations before 23 September 2014 and for 3 or more participants, the 4th participant will receive a complimentary seat

Important Notice: Payments are required with registration and must be received prior to the Course to guarantee your place.

PAYMENT METHODS

BY CHEQUE / BANK DRAFT:

Made payable to CLARIDEN GLOBAL INTERNATIONAL LIMITED and mail to: 3 International Business Park, #04-29, Nordic European Centre, Singapore 609927.

BY TELEGRAPHIC TRANSFER TO:

Bank Name: **Standard Chartered Bank**
Bank Code: **7144**
Bank Branch Code: **001**
Bank Address: **6 Battery Road, #01-01 Singapore 049909**
Bank Account No: **0107775042**
Bank Account name: **CLARIDEN GLOBAL INTERNATIONAL LIMITED**
SWIFT Code: **SCBLSG22**

Please note that all bank charges are to be borne by participants. Please ensure Clariden Global International Limited receives the full invoiced amount.

Note: Please include invoice number on all payment types and your company's name in your payment instructions for our reference.

CREDIT CARD:

To make payment by credit card, please call our client services hotline at +61 3 9909 7310.

4 WAYS TO REGISTER



Email: admissions@claridenglobal.com



Fax: +61 3 9909 7788



Call: +61 3 9909 7310



Website: www.claridenglobal.com

DATE AND LOCATION

This executive programme will be held at:

Shangri-La Hotel, Sydney

21 - 22 October 2014

176 Cumberland Street, The Rocks. Sydney, NSW 2000, Australia

Tel : +61 2 9250 6000

Fax : +61 2 9250 6250

Website : <http://www.shangri-la.com/sydney/shangrila>

The fee for this two-day executive programme includes all written materials, lunch and refreshments.

HOW TO REGISTER AND PAY

An invoice and registration confirmation will be sent within 7 days, please contact us if you have not heard from us within 7 days. Payment can be made by credit card, by bank transfer or by cheque made payable to "Clariden Global International Limited".

ALL PAYMENTS MUST BE RECEIVED IN ADVANCE OF THE EVENT.

ACCOMMODATION

Accommodation is not included in the programme fee but you will be entitled to use our corporate rate for your accommodation. Information will be sent along with your registration confirmation.

SPONSORSHIP

INTERESTED IN PROMOTING YOUR ORGANISATION TO OUR PARTICIPANTS

For more information on sponsorship, tabletop displays & insert opportunities, please contact us at +61 3 9909 7310.

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Once we have received your booking, the place(s) are confirmed. No refunds will be made for any cancellations, however, programme credits of equivalent value only applicable for Clariden Global events will be provided. Credits can only be redeemed for 1 programme and is valid for only one (1) year from date of issue.

Substitution with a qualified candidate is allowed by providing at least 5 working days of advance notice to Clariden Global. One time substitution is allowed with no charges. Subsequent substitutions will be charged 10% admin fee.

ALL CANCELLATIONS MUST BE RECEIVED IN WRITTEN FORM

PLEASE NOTE: Clariden Global International Limited reserves the right to change the content and timing of the programme, the speakers and the date and venue due to reasons beyond their control. If in the unlikely event that the course is cancelled, Clariden Global International Limited will refund the full amount and disclaim any further liability.

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