

2017 APPEA Taxation and **Commercial Conference**

15-17 NOVEMBER 2017 | STAMFORD GRAND, GLENELG, SOUTH AUSTRALIA



CONFERENCE DINNER

REFRESHMENT BREAKS

SATCHELS

WELCOME RECEPTION









2017 APPEA Taxation and Commercial ConferencePROGRAM—Pre-Conference and Day 1

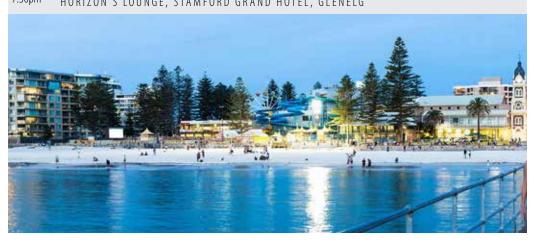
WEDNESDAY 15 NOVEMBER

4.30pm— **CONFERENCE REGISTRATION**6.30pm STAMFORD GRAND FOYER

5.30pm STAMFORD GRAND FOYER

5.30pm - **CONFERENCE WELCOME COCKTAILS**7.30pm HORIZON'S LOUNGE, STAMFORD GRAND HOTEL, GLENELG

SPONSORED BY PWC



THURSDAY 16 NOVEMBER

7.30am CONFERENCE REGISTRATION

8.30am PLENARY 1: OPENING SESSION

Session Chair: Malcolm Roberts, APPEA Chief Executive

Introductory comments from the Chair

Global economic outlook and implications for the Australian commodities sector

Paul Bloxham HSBC Bank Australia Ltd

Keynote Australian Government address

The Hon Kelly O'Dwyer MP Minister for Revenue and Financial Services

The Callaghan PRRT Review — learnings and implications for resource taxation policy

Mike Callaghan AM PRRT Review Chair

10.00am REFRESHMENT BREAK

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BALLROOM 1-3

10.30am PLENARY 2: TAX TRANSPARENCY — BUILDING COMMUNITY CONFIDENCE BALLROOM 1-3

Session Chair: John Condon, BP Australia

What represents a 'fair share of tax' from the business community? Enzo Coia Deloitte

The extractive industries transparency initiative — opportunities and implications for oil and gas companies Department of Industry, Innovation and Science

The benefits of transparency for taxpayers: the experience of a global resources company Jane Michie BHP

Successfully integrating taxation reporting into a company's disclosure programs Jonathan Rintoul EY

PANEL DISCUSSION

Program subject to change

Taxation administration and compliance priorities for Australia's resources sector — strengthening integrity and developing confidence Jeremy Hirschhorn ATO

12.30pm LUNCH PROUDLY SPONSORED BY DELOITTE



2017 APPEA Taxation and Commercial Conference PROGRAM—Day 1

THURSDAY 16 NOVEMBER

130nm

PLENARY 3: POLICY, LEGAL AND INTERPRETATIVE DEVELOPMENTS

BALLROOM 1-3

Session Chair: Stuart Brown, ExxonMobil Australia

Assessing the implications of the Chevron tax case — clarification or confusion?

Peter Collins PWC

Cross border-related party financing dealings — practical implications for taxpayers of the new ATO position

Jerome Tse King & Wood Mallesons

Diverted Profits Tax — what does it mean for taxpayers?

Paul Suppree Corporate Tax Association

Australia's thin capitalisation provisions: one size does not fit all

James Macky and Liam Delahunty KPMG

PANEL DISCUSSION

3.15pm

REFRESHMENT BREAK

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3.45pm

CONCURRENT SESSIONS 1&2

PRRT: policy update and technical issues
Session Chair: Justine Neep, Senex Energy
BALLROOM 1-3

Topics to be covered include:

- Key PRRT administrative and technical issues — the administrators perspective Patricia Sampathy and Faith Harako ATO
- The treatment of social infrastructure costs Rebecca Joyce Chevron Australia

PANEL DISCUSSION

2 Transaction issues and financial arrangements

Session Chair: Therese Stephenson, Origin Energy
BALLROOM 4

Mergers and acquisitions — current and emerging tax considerations

Kurt Burrows KPMG

Taxation of financial arrangements — an oil and gas industry perspective

Anthony Portas MinterEllison

6.30 for 7.00pm

CONFERENCE DINNER

CORIOLE VINEYARD, MCLAREN VALE

A bus will be leaving the Stamford Grand at 5.45pm sharp to transfer delegates to McLaren Vale.





2017 APPEA Taxation and Commercial Conference PROGRAM—Day 2

Program subject to change

FRIDAY 17 NOVEMBER

PLENARY 4: DOMESTIC AND INTERNATIONAL POLICY DEVELOPMENTS

BALLROOM 1-3

Session Chair: Michael Abbott, Woodside Energy and Chair of the APPEA Fiscal Committee

Federal Opposition address

The Hon Dr Andrew Leigh MP Shadow Assistant Treasurer

Implications on Australian oil and gas demand and investment in a carbon-constrained world

Frederic Papon & Fiona Hancock EY

The unintended consequences of government intervention in the east coast gas market

Saul Kavonic Wood Mackenzie

The operating environment — traditional industry, new expectations

Malcolm Roberts APPEA

PANEL DISCUSSION

10.45am REFRESHMENT BREAK

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11.15am CONCURRENT SESSIONS 3&4

3 Tax and operational issues
Session Chair: Sean Jermy, Santos
BALLROOM 1-3

Managing sovereign risk in long-term capital intensive projects

Carlo Franchina KPMG

What's next for the OECD and BEPS?

Michael Bona PWC

Key ATO income tax work program priorities

Rebecca Saint ATO

PANEL DISCUSSION

4 Royalty and non-income tax issues Session Chair: Dan Clancy, Origin Energy BALLROOM 4

The national innovation agenda and the R&D tax system Ezra Hefter EY

GST and joint ventures

Geoff Webb Chevron Australia

Best practice in royalty administration the South Australian Government experience

Nick Panagopoulos Department of Premier and Cabinet

Queensland royalties update Luke Hutchinson Shell

12.45pm LUNCH

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1.45pm PLENARY SESSION 5: PRACTICAL ISSUES FOR TAXPAYERS

BALLROOM 1-3

Session Chair: Marc Lewis, Woodside Energy

Understanding and applying the 'arms-length' principle to related party dealings

Cameron Rider Greenwoods & Herbert Smith Freehills

0&G infrastructure transaction — key tax considerations

Lauren Folkard Deloitte

The tax treatment of offshore hubs — tax administration versus commerciality

Martin Fry Allens

Understanding the scope and definition of petroleum exploration — nearing the end of the journey? Kenneth Wee $\,^{ATO}$

PANEL DISCUSSION

3.45pm CONFERENCE CLOSE