



# 2017 APPEA Taxation and Commercial Conference

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



CONFERENCE DINNER

REFRESHMENT BREAKS

SATCHELS

WELCOME RECEPTION



**Deloitte.**



# 2017 APPEA Taxation and Commercial Conference PROGRAM—Pre-Conference and Day 1

## WEDNESDAY 15 NOVEMBER

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

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

SPONSORED BY PWC



## THURSDAY 16 NOVEMBER

7.30am CONFERENCE REGISTRATION

8.30am **PLENARY 1: OPENING SESSION** BALLROOM 1–3  
*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 PROUDLY SPONSORED BY DELOITTE

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

### 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

1.30pm **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 Suppre** 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 PROUDLY SPONSORED BY DELOITTE

#### 3.45pm CONCURRENT SESSIONS 1&2

**1 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** PROUDLY SPONSORED BY EY  
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

### FRIDAY 17 NOVEMBER

9.00am **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

#### O&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

