



The IFA Australian Branch is pleased to invite you to the following online event

IFA's Pepsi "Pop"- Up – Lunchtime Webinar

The way forward for royalties, in Australia and internationally

"Royalty-free licenses" survived tax challenge in the High Court's much-awaited decision in *Commissioner of Taxation v PepsiCo Inc* [2025] HCA 30. The decision gives guidance and sparks further questions about the scope of the royalty withholding tax and diverted profits tax. Our deeply experienced panel will draw on the international tax law of royalties and developments in other key jurisdictions, and consider the way forward for goods/IP transactions, as well as related party structures and wholly digital products and services.

Date	Thursday, 28 August 2025
Time	12.30-1.30pm AEST
Format	Online webinar with audience Q&A
RSVP	Please register your attendance here .



Chloe Burnett SC,
Sixth Floor Selborne
Wentworth
Chambers (Chair)



Jerome Tse,
Partner, KWM
(Speaker)



Gary Sprague,
Partner, Baker &
McKenzie, Palo Alto,
USA (Speaker)



Peter Walmsley,
Deputy Chief Tax
Counsel, ATO
(Speaker)

This event is free for members and AUD 75 for non-members. Corporate members can include four attendees free of charge, and additional attendees may participate for free if they are individual members, or AUD 75 otherwise. Please note that membership is free for individuals under 30 and half price for individuals under 40. If you would like to become a member, please do so [here](#).