

Representative Legal Matters

Miles Hurst

- Advising a large multinational group on the deductibility of stock-based compensation recharge arrangements and application of Australia's imported hybrid mismatch rules.
- Advising a large multinational on changes to its Australian operating structure.
- Advising a large multinational on the application of withholding taxes to its outbound payments.
- Assisting a large multinational industrial group to obtain a private ruling from the Australian Taxation Office (ATO) on the tax treatment of its Australian arrangements.
- Advising a global financial services group on a ATO audit.
- Advising a large infrastructure investment group on engagement with the ATO regarding corporate dual tax residence issues.
- Advising a global infrastructure consulting firm on an ATO audit.
- Advising a global technology company on an ATO audit.
- Advised Kao Corporation on its AUD 400M+ acquisition of Australian skincare brand Bondi Sands.
- Advised Sev.en Global Investments on its circa AUD 1.5 billion acquisition of a 51% interest in ASX listed Coronado Global Resources, Inc. from The Energy & Minerals Group.
- Advising a family office on the potential application of Australia's new debt deduction creation rules.
- Assisted a global retail group dealing with an ATO Combined Assurance Review.
- Advised a global fast moving consumer goods group on a tax audit focused on thin capitalization and the general anti-avoidance rule.
- Advised 5E Advanced Materials, Inc. and American Pacific Borates Limited on a restructure, demerger, and successful NASDAQ listing.
- Advised Real Asset Management on the creation, restructuring, and IPO of RAM Essential Services Property Fund, involving 33 properties worth over AUD 700 million.

- Advised SK E&S on its USD 390 million acquisition of a 25% interest in the Bayu-Undan and Darwin Liquefied Natural Gas from Santos, and post-acquisition restructure of the interests acquired in the assets.
- Advised a global biotechnology firm on cross-border tax issues.
- Advised a number of global firms in the technology, infrastructure and biotechnology sector on the application of Australia's anti-hybrid rules and supply chain restructures.
- Advised US based private equity funds and hedge funds on the acquisition, restructure, and disposal of Australian investments.
- Advised Maoneng Group on the majority investment by Gaw Capital Partners, in connection with one of the largest portfolios of battery energy storage systems (BESS) in Australia.
- Advised Origin Energy on tax issues associated with the USD 2.12 billion sale of a 10% stake in the Australia Pacific Liquefied Natural Gas joint venture with ConocoPhillips and Sinopec.
- Advised Siemens Financial Services on its AUD 2 billion Forest Wind joint venture with CleanSight.
- Advised Varde Partners on the potential IPO of Latitude Financial.
- Advised Santos on a carbon capture and storage joint venture involving the repurposing of depleted onshore gas reservoirs as underground carbon storage chambers.
- Advised Mastercard on the AUD 126 million acquisition of Wameja, its joint venture partner for the HomeSend global payment hub.
- Advised Morrison & Co on its acquisition of water utility Flow Systems.
- Advised RATCH-Australia Corporation on the acquisition of a 70% stake in Western Australia's largest wind farm, Yandin, from Alinta Energy.
- Advised YTL Corporation on the AUD 200 million+ acquisition of The Westin Perth.
- Advised Caisse de dépôt et placement du Québec on taxation aspects of the consortium acquisition of a AUD 10.3 billion 99-year lease of the TransGrid NSW electricity network assets, including negotiation with the ATO and NSW Government to obtain certainty on tax outcomes.



- Advised Northwest Real Estate Investment Trust on its AUD 600 million staged acquisition of Generation Healthcare Real Estate Investment Trust and its buy out of Generation Healthcare Management.
- Advised Malakoff Corporation Berhad (Malaysia) on the acquisition and refinancing of a 50 percent interest in the AUD 1.2 billion Macarthur wind farm in Victoria from Meridian Energy.