

## Direct Tax Senior Associate

Ashurst's Disputes, Investigations & Advisory, Sydney

### Recruitment

<b>About Ashurst</b>	<p>Ashurst is a leading progressive global law firm with a rich history spanning more than 200 years. We are proud of our history and are future-focused, having expanded into new technologies through our NewLaw division, Ashurst Advance, and our consulting arm. Our in-depth understanding of our clients and commitment to providing excellent standards of service have seen us become a trusted adviser to local and global corporates, financial institutions and governments in all areas of commercial law. To find out more please visit <a href="http://www.ashurst.com">www.ashurst.com</a>.</p>
<b>Team overview</b>	<p>Covering the full range of direct and indirect tax, Ashurst's Tax team is one of the most respected in the market. Our broad experience means we are able to assist clients with market leading tax advice as well as day-to-day client service. In doing so, we aim to provide clients with strategic insights into dealing with tax risk and developing effective solutions to tax problems.</p> <p>We work on some of the largest and most significant transactions in Australia. We are well-regarded by clients for our ability to deliver commercial tax advice that is clear and easily understood. A number of our team members have previously worked in large accounting firms, so bring the benefit of that experience when advising clients.</p>
<b>Job overview</b>	<p>Our top tier national direct Tax team (Chambers Asia Pacific, Australia: Tax, 2024) is busy and growing and is looking to hire a Senior Associate. You will work on a mix of matters, assist with building out the practice and advise our growing client portfolio across our Australian offices.</p> <p>Each day will be different and cover a variety of industries, transactions and client bases. Working with all our direct tax partners in nimble client focussed teams your role will include:</p> <ul style="list-style-type: none"><li>• Formulating and advising on commercial solutions to tax challenges across a variety of industries and sectors including property, funds management, restructures, mergers and acquisitions and financial services.</li><li>• Leading tax teams to implement transactions working hand in hand with clients and colleagues across all of Ashurst's practices.</li><li>• Reviewing and assisting with drafting of legal documents and agreements.</li><li>• Liaising with revenue authorities.</li></ul>

- Business development and networking activities.
- Contributing to firm know-how and team culture.

Description of Senior Associate Role:

- You will act with integrity to provide incisive advice to clients, and to work collaboratively with your colleagues in doing so
- You will take day to day responsibility for matters, with suitable direct client contact, and will proactively progress complex matters with appropriate partner support
- You will be able to demonstrate well developed oral and written communication skills, and innovative drafting skills
- You will be confident and effective in negotiations with clients and counterparties
- You will be effective in communicating with clients in order to understand their needs and how best to meet them. You will also have the ability to assist clients in arriving at practical and cost effective solutions
- You will be effective in forming relationships with clients and you will impress them with the depth of your legal knowledge and commercial awareness
- You will understand the way our business, competitors and clients are developing and work with the business development team to use this information to develop business opportunities
- You will build and maintain a network of business contacts. In addition you will proactively identify opportunities to introduce your clients to other offices and practice areas, working intelligently with partners, other lawyers and the business development team to exploit opportunities
- You will have excellent attention to detail, identifying inconsistencies that indicate problems with quality of work or a misunderstanding of clients' needs
- You will gather information from a variety of sources to identify your own strengths and weaknesses
- You will be able to identify when a team member needs support and will be approachable for advice, giving constructive feedback
- You will help build team morale and motivate team members contributing to the creation of a positive work environment and assist with training and development
- You will undertake pro bono work
- You will ensure that all activities and duties are carried out in full compliance with our regulatory requirements and internal policies

**Essential skills and experience**

- 5+ years' income tax experience gained within a top-tier law firm, professional services firm or in-house specialist tax team.
- We require candidates who have a law degree and who have completed the College of Law or equivalent
- Excellent analytical and problem solving ability

	<ul style="list-style-type: none"> <li>• Good delegation skills and the ability to efficiently manage multiple matters at any one time</li> <li>• An appetite to develop expertise in new and emerging areas of tax law</li> <li>• Excellent communication skills, both written and verbal</li> <li>• A commercial approach and an ability to negotiate effectively</li> <li>• Strong attention to detail</li> <li>• Superior drafting and research ability</li> <li>• The ability to be team-focused and also work independently</li> <li>• A proactive, positive and energetic approach with a commitment to providing excellent service and, a desire to interact with the market and build client relationships</li> </ul>
<b>Recent work</b>	<ul style="list-style-type: none"> <li>• We advised Woolworths in relation to a number of its recent transactions, such as its acquisition of a 55% interest in the Petspiration Group.</li> <li>• We advised Mirvac Limited in relation to the proposed replacement of AMP Capital Investors Limited (AMPCI) as trustee of AMP Capital Wholesale Office Fund.</li> <li>• We advised Ivanhoé Cambridge on all tax matters relating to a joint venture with Stockland for a material property development in Sydney.</li> <li>• We advised Barrenjoey on the initial investments and establishment of the Community Capital Credit Fund (CCCF).</li> <li>• We advised Oxford Properties Group (Oxford), the real estate arm of the Ontario Municipal Employees Retirement System (OMERS) on its 49.9% sell down to Link Real Estate Investment Trust (Link REIT) of its holding in the Investa Gateway Office premium-quality office property portfolio (market value of over A\$2.3 billion)..</li> <li>• We advised Downer EDI Group on the income tax aspects of the sale of its Australian transport projects business to an Australian subsidiary of Gamuda Berhad, a large engineering and construction company listed in Malaysia, by way of an asset sale.</li> <li>• We advised ANZ in respect of its agreement to acquire Suncorp Bank for \$4.9 billion.</li> <li>• We advised BHP regarding issues associated with the establishment of a global structure for the holding of carbon credits.</li> </ul>
<b>Career advancement</b>	An established Senior Associate Career Path Framework is in place clearly defining expectations and outlining opportunities for promotion.
<b>Secondment opportunities</b>	Opportunities may arise for Senior Associates to spend time on secondment in house with a key client of the firm.
<b>Background checks</b>	In order to comply with regulatory and client requirements, Ashurst will undertake appropriate vetting of staff. When applicants accept a job offer, Ashurst, alongside a specialist provider, will undertake professional verification and background checks. These checks are only undertaken with consent, and in accordance with our legal and regulatory obligations.

## Partner Profiles



**Costa Koutsis** is a partner and the practice head of our Australian tax practice

Costa is an indirect tax specialist with over 20 years of experience advising on the stamp duty, GST and land tax implications of complex transactions as well as engaging with and managing disputes with revenue authorities across Australia.

Costa's experience stretches across a variety of transactions and industries including domestic and cross border mergers and acquisitions, capital raisings, privatisations, restructures and property investment and development transactions.

Costa is known for working closely with clients and their advisers to identify, formulate and implement commercial solutions to indirect tax issues.



**Vivian Chang** is a partner in our tax practice

Vivian's practice focuses on the Australian and international tax aspects of corporate and financial services transactions. She specialises in the areas of corporate mergers, acquisition and reorganisations, financial products, funds management and tax disputes.

Vivian advises Australian and multinational clients in a wide range of industries including financial services, property, energy and resources, industrials, consumer and technology.

Vivian's expertise includes advising on complex taxation issues, tax structuring, dealing with stakeholders and tax authorities, drafting and negotiating legal documentation that helps her clients achieve their commercial objectives while appropriately managing tax risks.



**Sanjay Wavde** is a partner in our tax practice

Sanjay advises on income tax matters, with a particular focus on funds management, mergers and acquisitions, and infrastructure transactions. He provides practical and strategic advice on a wide range of complex tax issues. His expertise includes advising on tax disputes, tax due diligence and structuring, and advising on tax-related

transaction documentation issues.

Sanjay has significant international experience. He has a Master of Laws in Taxation from New York University School of Law, is also admitted as an attorney in New York, and has practised taxation law in both Australia and the United States.



**Steve Whittington** is a partner in our tax practice

Steve advises on income tax matters, with a particular focus on funds establishment, real estate, mergers and acquisitions, and financial arrangements. His expertise in advising on the establishment of real estate funds extends to all asset classes, including commercial office, build to rent, hotels, logistics and retail.

Steve regularly advises on cross-border taxation issues across a broad range of industries, including utilities, property and financial services. He has advised a number of inbound investors and outbound investors on the proposed thin capitalisation measures.

Steve has practiced in both New Zealand and Australia.