



Naeha Lal

Senior Associate

Sydney
+61.2.9513.2491

Naeha.Lal@klgates.com

OVERVIEW

Naeha is a tax lawyer who advises clients on a broad range of taxation issues, including mergers and acquisitions, inbound and outbound investments, corporate structuring and reorganisations, employee incentive arrangements, and not-for-profit exemptions and concessions.

Naeha also assists clients with their tax reviews and audits, voluntary disclosures and other reporting obligations with the Australian Taxation Office.

PROFESSIONAL BACKGROUND

Prior to joining K&L Gates, Naeha worked for a premium Australian commercial law firm.

ACHIEVEMENTS

- Recognised as a winner for Taxation by *Lawyers Weekly* 30 Under 30 Awards, 2021

PROFESSIONAL / CIVIC ACTIVITIES

- Member, Law Society of New South Wales
- Mentor, Sydney University Law Careers Mentoring Program, 2018 and 2020

EDUCATION

- Graduate Diploma in Legal Practice, College of Law, 2015
- Bachelor of Laws and Commerce, Macquarie University, 2014

ADMISSIONS

- Supreme Court of New South Wales

LANGUAGES

- Hindi
- Punjabi

AREAS OF FOCUS

- Tax

REPRESENTATIVE EXPERIENCE

Australia Experience

- Advising a US based logistics company on the establishment of a managed investment trust structure to fund the acquisition of its Australian real estate assets, including assisting the company with submitting its foreign investment review board (FIRB) application.
- Advising an Australian development company on the income tax implications arising in relation to its potential "build-to-rent" housing projects, including advice on the implementation of a commercial debenture programme structure.
- Reviewing the proposed US investment and corporate restructure of an Australian listed oil and gas company, including advice on the group's inter-company loan structure and transfer pricing issues.
- Acting for a high net worth family group within the property development industry in undertaking a due diligence of its investment structure and general tax affairs, including a review of its FBT liabilities and intra-group loan arrangements.
- Advising an Australian high net worth family group on the restructure of its asset ownership structure so as to provide the most advantageous structure for third party investors prior to a planned capital raising transaction.
- Acting on behalf of a mining company in a matter before the Administrative Appeals Tribunal involving a dispute between the company and the ATO regarding a claim for research and development tax incentives.
- Acting on behalf of an international aviation company in relation to an objection with the ATO with respect to the company's ability to utilise carried forward tax losses.
- Advising a US limited partnership on how to structure an employee incentive program for its Australian subsidiary, including advice on the application of the foreign hybrid provisions in Australia.
- Advising a start-up company on how to structure and implement an employee share scheme, including advice on the company's eligibility to access the early-staged innovation company tax concessions.

- Acting on behalf of Quaden Bayles, an Aboriginal child with dwarfism, and his family, in a pro bono matter involving the implementation of a tax efficient structure to receive funds raised by comedian, Brad Williams, through his GoFundMe campaign in the US, and providing ad hoc assistance in that respect.

UK Experience

- Advising a foreign government in relation to the VAT and stamp duty land tax implications arising from acquiring an embassy site in London.
- Advising a sovereign wealth fund and a global investment manager on the sale of their underlying interests in real estate located in Central London and valued at approximately, £350 million.
- Advising a sovereign wealth fund with the restructuring of its joint venture arrangement with a UK company. This involved implementing a tax efficient structure so that the underlying interests in undeveloped UK land could be split into two separate parcels of land and under two separate holding vehicles. This was to enable ease for future financing arrangements and cleaner exit strategies.
- Advising private equity investor ESO Capital (ESO) on its investment in facilities management company, Arcus FM. The deal was structured as the financing of a management buyout, which also saw ESO take a significant minority equity stake in the business and will enable Arcus to accelerate its expansion plans.
- Assisting Naked Wines Plc on their £11.3m sale of the entire issued capital Lay & Wheeler Limited and Vinotheque Holdings Limited, which together comprise the Lay & Wheeler business.