



Brazil Tax Conference 2020

19 de março de 2020 – São Paulo/SP

No mundo globalizado e transparente de hoje, indivíduos, empresas e profissionais do Direito enfrentam um conjunto de novos e exigentes desafios com relação a conformidade regulatória e fiscal. Os desenvolvimentos recentes na área de transparência fiscal e troca de informações para fins fiscais criaram um cenário competitivo no qual o cumprimento eficiente das leis tributárias é a chave para o sucesso.

O Brazil Tax Conference 2020 discutirá as alterações mais recentes na legislação tributária brasileira na perspectiva do direito tributário nacional e internacional, além de incluir análises de direito comparado em jurisdições selecionadas. Renomados profissionais e estudiosos do direito tributário irão explorar as questões-chave para garantir a conformidade fiscal de planejamentos tributários transnacionais em um cenário de transparência fiscal.

Durante a manhã, serão abordadas as recentes alterações na legislação tributária brasileira e os principais pontos das propostas da reforma tributária em andamento no Congresso Nacional (PECs 45 e 110/2019), tais como a criação do IBS, a modificação no regime JCP, retorno da tributação dos dividendos, entre outros. Haverá também um painel com apresentação estudos de casos abordando o planejamento tributário nos cenários inbound e outbound para diversas jurisdições selecionadas, tais como EUA, México e países da América Latina. A convergência das normas tributárias brasileiras aos padrões da OCDE também será tema de destaque no período da manhã, assim como a análise dos programas de residência fiscal e cidadania para contribuintes brasileiros de alta renda.

Durante a tarde, o foco mudará para o regime dos Preços de Transferência brasileiro e seus reflexos nas transações internacionais e sua convergência com as regras da OCDE. O painel sobre a tributação da economia digital analisará os possíveis impactos da Adoção Global dos pilares da OCDE para multinacionais de tecnologia. A importância da ética e do compliance para a tributação e busca da preservação patrimonial no mundo regulado também serão temas de destaque.

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PROGRAMAÇÃO

08:30 Credenciamento

09:00 Propostas de Reforma Tributária brasileira e os possíveis impactos nos planejamentos tributários

- Recentes alterações na legislação tributária brasileira e análise das propostas de reforma tributária, incluindo avaliação crítica dos principais pontos das PEC 45 e 110/2019, tais como o imposto sobre bens e serviços (IBS), alterações no imposto sobre a renda, retorno da tributação de dividendos, extinção e/ou modificação do regime de JCP, entre outros.
- Possíveis impactos das alterações da legislação brasileira nos planejamentos tributários domésticos e internacionais.

Presidente de mesa: Alessandro Mendes Cardoso (Brasil), **Palestrantes:** Vanessa Rahal Canado (Brasil), João Francisco Bianco (Brasil) e Raquel Preto (Brasil)

10:00 Planejamento Tributário no âmbito do BEPS

- Divulgação Obrigatória de Planejamentos Fiscais Potencialmente Agressivos - DAC 6 Diretiva 2018/822 da União Europeia: Conceitos fundamentais, enquadramento, deveres de reporte, estudo de casos.
- Cláusulas PPT e LOB: reflexos nos planejamentos tributários internacionais. Estudo de Casos.
- Recentes tratados de bitributação assinados pelo Brasil e aderentes ao BEPS.

Presidente de mesa: Luciana Goulart Ferreira (Brasil), **Palestrantes:** Marcus Lívio (Brasil) e Susana Soutelinho (Portugal)

10:50 Coffee break

11:00 Recentes alterações nos Programas de Residência Fiscal e de Cidadania para brasileiros de alta renda

- Requisitos de elegibilidade para mudança de residência fiscal ou cidadania.
- Comparativo das vantagens e desvantagens da relocação para fins fiscais.
- Jurisdições atraentes para cidadãos brasileiros e recentes alterações no programa português.

Presidente de mesa: Roland A. Pfister (Suíça), **Palestrante:** Jacopo Zamponi (Suíça e Itália) e Marcos Catão (Brasil)

11:45 Planejamento Tributário para pessoas físicas e jurídicas em uma visão comparada com jurisdições selecionadas: USA, Mexico e Brasil

- *Doing Business* com os EUA.
- Estudos de caso sobre planejamento tributário sob uma perspectiva brasileira e jurisdições selecionadas. Cenários inbound: investidores americanos investindo no México e Brasil.
- Estudos de caso sobre planejamento tributário sob uma perspectiva brasileira e jurisdições selecionadas. Cenários outbound: brasileiros visando os EUA e México para fins de investimento.

Presidente de mesa: Frederico de Almeida Fonseca (Brasil), **Palestrante:** Mitchell Weiss (USA)

12:30 Almoço

14:00 Preservação Patrimonial no Mundo Regulado e o Case de Liechtenstein

- Recentes alterações na legislação sobre o direito fiduciário de Liechtenstein.
- Fundamentos sobre a preservação Patrimonial em Liechtenstein.
- O intercambio automático de informações em Liechtenstein.
- Protected Cell Company em Liechtenstein.
- International Private Label Funds em Liechtenstein.

Presidente de mesa: Roland A. Pfister (Suíça), **Palestrante:** Count Francis von Seilern-Aspang (Liechtenstein)



PROGRAMAÇÃO

14:50 Global Wealth and Asset Management Market

- The Swiss economy.
- The Swiss Wealth and Asset Management Market.
- Why investors like Switzerland.
- FINAPORT – a Global Financial Expert based in Switzerland, United States and Singapore.

Palestrante: Dr. Philipp Hofstetter (Suíça)

15:00 Alterações no Regime dos Preços de Transferência brasileiro

- Reforma do regime de *Transfer Pricing* brasileiro e reflexos nas transações internacionais entre pessoas vinculadas.
- Convergência com as regras da OCDE.
- Estudo de casos.

Presidente de mesa: Elidie Palma Bifano (Brasil), Palestrantes: Luis Eduardo Schoueri (Brasil) e Patrícia Lopes (Brasil), Moderador: Phelippe Oliveira (Brasil)

16:00 Coffee break

16:15 Tributação da Economia Digital

- Possíveis impactos da Adoção Global dos Pilares da OCDE de Economia Digital para as Multinacionais de Tecnologia.
- Estudo de Casos.

Presidente de mesa: Daniela Silveira Lara (Brasil), Palestrante: Tathiane Piscitelli (Brasil) e Gisele Bossa (Brasil)

17:00 Tax Compliance and Ethics

- Porque a ética importa para a Tributação.
- Padrões éticos nos planejamentos tributários das grandes organizações.
- Estudo de Casos (Tax Compliance Management House).

Presidente de mesa: João Dácio Rolim (Brasil), Palestrantes: Robert Von Brederode (Holanda e USA), Marco Antonio Veríssimo Teixeira (Brasil) e Roland A. Pfister (Suíça), Moderador: Isabel Calich (Brasil), Marcelo Veiga (Brasil) e Ricardo Castagna (Brasil)

18:30 Coquetel e Networking



Alessandro Mendes Cardoso | Rolim, Viotti & Leite Campos Advogados, Brazil

Alessandro Mendes is a Partner at Rolim, Viotti & Leite Campos Advogados and responsible for the firm's tax litigation. He graduated from UFMG and holds a PhD in Public Law at PUC / MG, Master in Tax Law from the Federal University of Minas Gerais (UFMG). Alessandro is a Tax Law professor and the author of tax related books. He is recognized as a prominent professional in several rankings, such as Chambers and Partners Latin America, amongst others.



Count Francis von Seilern-Aspang, TEP | INDUSTRIE- UND FINANZKONTOR ETS, Liechtenstein

Count Francis von Seilern-Aspang is Managing Director and Chairman of the Executive Committee of Industrie- und Finanzkontor Ets., a leading trust company with tradition and expertise in the long-term and multi-generational preservation of wealth, family values and businesses. Furthermore, he is Vice Chairman of Seilern Investment Management Ltd., an independent and privately-owned investment management company in quality-growth equities. In addition, Count Francis von Seilern-Aspang is a member of the Society of Trust and Estate Practitioners (STEP).



Daniela Silveira Lara | Rolim, Viotti & Leite Campos Advogados, Brazil

Daniela Silveira Lara has worked with Tax and Social Security Law for more than 20 years and is widely acknowledged for her expertise in domestic and foreign tax matters. She has authored several publications in Tax Law and coordinates the Tax Commission of the Brazilian Association of Information Technology and Communications (ABDTIC). Daniela is currently the Vice-president of the Tax Law Special Commission of OAB/SP (Brazilian Bar Association/São Paulo Section).



Elidie Palma Bifano | Mariz de Oliveira and Siqueira Campos advogados, Brazil

Elidie Bifano is a lawyer in the advisory and administrative litigation areas at Mariz de Oliveira and Siqueira Campos advogados. She holds her PhD at Pontifícia Universidade Católica (PUC). Elidie is a Vice President of Finance at the Brazil - Canada Chamber of Commerce, President of the São Paulo Center for Tax Law and Professor at Fundação Getúlio Vargas and Counselor of IBDT. Also, Ms. Bifano served for several years as a managing partner at PWC – PricewaterhouseCoopers.



PALESTRANTES



Frederico de Almeida Fonseca | Rolim, Viotti & Leite Campos, Brazil

Frederico de Almeida Fonseca studied Law at the Pontifical Catholic University of Minas Gerais (PUC), Brazil. He holds an LL.M. in Tax and Corporate Law from the Milton Campos University and an LL.M. in Regulatory Law from the Fundação Getulio Vargas (FGV), with a focus on the taxation of the Brazilian Energy Sector. Frederico is now the Head of the Tax Consulting department of Rolim, Viotti & Leite Campos Attorneys at Law (Minas Gerais) with his focus on national and international tax and estate planning as well as M&A transactions. He is a tax lecturer in many LL.M. Programs in Brazil and participates in both Corporate and Regulatory Commissions at the Brazilian Bar Association.



Gissel Bossa | CARF, Brazil

Gissel Bossa is a judge at Administrative Tax Court of Appeals - CARF. She received her Master and PhD degree in Legal and Economic Science at Coimbra University (PT). Currently she is Manages tax projects at GETAP - Applied Tax Studies Group and acts as advisor in fiscal transparency projects at Nucleus of Fiscal Studies (NEF) and in Tax and New technologies projects at Nucleus of Professional Master in FGV Law School SP. With experience in government affairs and more than 13 years in litigation and tax advisory, managed areas of strategic litigation in corporations of different economic segments: C&A, Natura, Abril and Novartis. She is also a Teacher and Speaker in educational institutions and executive programs in Brazil and abroad.



Isabel Calish | Huck, Otranto, Camargo, Brazil

Isabel Garcia Calich da Fonseca is a tax partner at Huck, Otranto, Camargo Advogados, a law firm headquartered in São Paulo, Brazil. She holds an LL.M and PhD in taxation from the London School of Economics and Political Science (LSE). She is also a member of the Brazilian Institute of Tax Law (IBDT), International Fiscal Association (IFA) and STEP. She is a member of the Brazilian Institute of Tax Law (IBDT), International Fiscal Association (IFA) and STEP.



Jacopo Zamboni | Henley & Partners, Switzerland

Jacopo Zamboni is a director and client advisor at Henley & Partners Switzerland AG. He holds a Master of Science degree in Finance from Bocconi University (Italy) and currently provides advice on residence and citizenship planning to private banks, family offices and lawyers, throughout Switzerland and Luxembourg. Prior to joining Henley & Partners, Jacopo Zamboni worked for a Swiss insurance company where he advised multinationals on the ways to protect their mobile employees, as well as managing relationships with Swiss private banks that required tailor-made insurance solutions for high net worth individuals.



PALESTRANTES



Dr. João Dácio Rolim | Rolim, Viotti & Leite Campos, Brazil

João Dácio Rolim is the founding partner, chairman and head of the Tax Department at Rolim, Viotti & Leite Campos Advogados. He handles transactional and litigation matters and assists clients on a myriad of domestic and cross-border tax issues. He holds a PhD (Doctor of Philosophy) on international and comparative taxation from Queen Mary University of London, and a PhD on Tax Law from the Federal University of Minas Gerais (Brazil). He also attained an LLM in International Taxation from the London School of Economics and Political Science (LSE), and an LLB from the São Paulo University (USP) School of Law (Brazil). He is ranked in Chambers and Partners (Global and Latin America), Legal 500, and Latin Lawyer as a leading tax lawyer in tax consultancy and litigation. He also participates actively in various Brazilian and international tax associations and institutions.



Dr. João Francisco Bianco | Mariz de Oliveira e Siqueira Campos, Brazil

João Francisco Bianco is a tax partner at Mariz de Oliveira e Siqueira Campos Law Firm. He holds a PhD. and a LL.M (Masters Degree) in Taxation Law. João Francisco Bianco worked for many years as a tax counsellor at the Brazilian Federal Tax Administrative Court (CARF). He is also a Tax Professor and member of the Brazilian Institute of Taxation Law (IBDT).



Luciana Goulart Ferreira | Rolim, Viotti e Leite Campos, Brazil

Luciana Goulart Ferreira is a tax partner at Rolim, Viotti & Leite Campos Attorneys at Law. She holds a Master Degree in Public Law from Pontifícia Universidade Católica de Minas Gerais (PUC-MG) and a LL.M in Economic Law from Fundação Getúlio Vargas (FGV). Recognized by the most important rankings such as Análise Advocacia 500; Chambers and Partners Global, Chambers and Partners Latin America, IFLR 1000 and The Legal 500 and World Tax. Luciana is a former member of the Taxpayers Council of Minas Gerais State (2014-2016).



Prof. Luis Eduardo Schoueri | Lacaz Martins, Pereira Neto, Gurevich & Schoueri | University of São Paulo Law School, Brazil

Luis Eduardo Schoueri is a fulltime professor of Tax Law at the University of São Paulo Law School (USP), the Vice-President of the Brazilian Institute of Tax Law (IBDT) and a founding partner at Lacaz Martins, Pereira Neto, Gurevich & Schoueri Advogados. He obtained his master's degree in Law from the University of Munich and his doctor's and professor's degree from the University of São Paulo. He has taught law at several universities in the United States and Europe and was also the Hauser Global Professor of Law for the 2016 Spring Semester at the New York University (NYU). Besides several articles published in Brazil and abroad, he has authored various books on tax law.



Marco Antônio Veríssimo | Secretaria da Fazenda, Brasil

Marco Antonio Veríssimo Teixeira holds a PhD in Tax Law from USP. He is a specialist in State Law from the Superior School of the Attorney General of the State of São Paulo and a Specialist in Tax Law and Bachelor of Law from USP. Marco Antonio also holds an Electrical Engineer degree from Escola Politécnica da USP. He works as a Tax Consultant at the São Paulo Finance and Planning Secretariat and is a Chief Judge at the Superior Chamber of the São Paulo Tax and Tax Court.



Marcos André Vinhas Catão | ABDF- Associação Brasileira de Direito Financeiro, Brazil

Marcos Andre graduated in Law from the State University of Rio de Janeiro (UERJ). He holds a Doctorate in Public Law from Universidad San Pablo in Spain (CEU). Marcos is a member of the Standing Scientific Committee of the International Fiscal Association (IFA) and the Director of the Brazilian Association of Financial Law (ABDF).



Marcus Lívio | Second Federal Court, Brazil

Marcus Livio Gomes is a Federal Judge at 2nd Federal Court (Rio de Janeiro, Brazil), Coordinator and Lecturer of the Tax Law Committee of the Federal Judiciary School of the 2nd Federal Court, Associated Research Fellow at the Institute of Advanced Legal Studies (IALS/University of London), Associate Professor for the Bachelor, Master and PhD programmes in Tax Law and International Tax Law at Rio de Janeiro State University, Brazil.



Mitchell B. Weiss | Deloitte Tax LLP | Northwestern University Pritzker School of Law, USA

Mitchell Weiss is a licensed attorney and CPA in Illinois and holds a B.S. and Masters in Tax (Southern Illinois University) and a J.D. (University of Chicago Law School). He has over 20 years of international tax experience, during which time he has advised domestic and foreign multinationals on various cross-border matters, including the tax-efficient structuring of international expansions, dispositions, reorganizations, and financings. He is a frequent speaker at various tax conferences. He is also a member of various tax associations such as the International Tax Journal's Advisory Board and the USA Branch of the International Fiscal Association's Executive Council. As an adjunct professor in the LL.M in Tax Program at Northwestern University Pritzker School of Law, he teaches an advanced course on the international taxation of partnerships. Mitchell Weiss has published numerous articles and books on international taxation.

**Patricia Lopes | Global Tax Manager na lochpe-Maxion S.A., Brasil**

Patricia Lopes is a Global Tax Manager at lochpe-Maxion S.A., a Brazilian multinational located in 14 countries, the world leader in the production of automotive wheels and a leading producer of structural components. Patricia has more than 13 years of professional experience in tax planning and compliance, international tax, transfer pricing and corporate restructuring. Prior to joining lochpe-Maxion, she worked at Big4 companies and multinationals in Brazil and abroad. Patricia is a lawyer and holds a MBA in finance at Insper.

**Dr. Phelippe Toledo Pires de Oliveira | CARF, Brazil**

Phelipe Oliveira currently works at the Office of the Attorney General for the National Treasury in the Brazilian Ministry of Finance. Phelippe holds a Master in Taxation at the University of Paris, Sorbonne and a PhD and a LL.M in Tax, Economic & Financial Law at the University of São Paulo, where he graduated with honors . Previously he worked in the International Tax Services Group and VAT Group at Ernst & Young Brazil. Also he has experience as a legal advisor at the Office of Legal Counsel within the Attorney General's Office in Brazil and as a special advisor for the Minister of Justice. Phelippe was a Visiting Scholar at the University of London, Queen Mary (2018) and a Visiting Researcher at the Boalt Hall School of Law at University of Berkeley, California (2016).

**Dr. Philipp A. Hofstetter | Managing Partner at Finaport Ltd., Zurich, Switzerland**

After graduation from the University of Zurich with a PhD magna cum laude of the faculty of economics, business administration and information technology, Philipp worked for PricewaterhouseCoopers in the Corporate Finance space, both in Switzerland and the US. Subsequently he joined UBS Investment Bank in Switzerland as a project manager for Investment Banking Advisory transactions. In 1999 he re-joined PwC to take the lead of the Investment Banking Advisory business. From 2014 to 2017 Philipp built and led the PwC Corporate Finance business in the US. After returning to Switzerland he built a Private Equity fund focusing on acquisitions in the German speaking part of Europe. Since 2019 he is a Managing Partner of Finaport, a Global Wealth- and Asset Management Company in Switzerland, where he is responsible for the Investment Banking as well as for the Private Market Products businesses.

**Raquel Elita Alves Preto | OAB SP, Brazil**

Raquel Preto is a Consultant Member at Tax Litigation Commission of Brazilian Bar Association (OAB SP). Raquel holds a PhD in Tax Law from University of São Paulo as well as other specialisations, LL.Ms and MBAs in Tax Law, Business Law, Corporate Governance, Accounting and Finance. She is a militant lawyer in the tax and business areas and a management and tax advisor in companies and third sector entities.



Dr. Robert F. van Brederode | BrederodeTax, Netherlands and USA

Robert van Brederode is an independent tax lawyer and legal scholar. He holds an LL.M (Utrecht University) and a PhD in Tax Law (Amsterdam University) and currently leads his niche tax consulting firm, focusing on in-bound US investments and on assisting US firms expanding abroad, especially to the EU. He served as assistant professor at Maastricht University, School of Law, professor of tax law at the Erasmus University, School of Economics, and adjunct professor at New York University, School of Law, Graduate Tax Program. Robert has many tax publications (journal articles and books) and has also participated in various international seminars and conferences.



Dr. Roland A. Pfister | Badertscher Attorneys at Law | Lucerne University of Applied Sciences and Arts, Switzerland

Roland A. Pfister studied law at the Universities of Neuchâtel and Granada. He holds an Executive MBA in Wealth Management and a PhD in international tax law from the University of Neuchâtel. Roland was also a Visiting Researcher at Harvard Law School. He is a regular contributor to tax journals and lectures frequently in postgraduate tax programs. Since 2015, he works at an international corporate and tax law firm in Zurich. His main areas of expertise include both domestic Swiss and Liechtenstein as well as international tax law with a particular emphasis on tax-compliant wealth planning for high net-worth individuals and corporate entities (including funds, trusts and partnerships).



Susana Soutelinho | CTSU - Sociedade de Advogados, Portugal

Susana Soutelinho is a Portuguese lawyer with a large experience in Tax Consultancy and Tax Litigation. She joined CTSU - Sociedade de Advogados (Member of Deloitte Legal Network), in June 2019 and is currently the Partner Coordinator responsible for CTSU's team working in Tax Litigation. Susana dedicates almost exclusively to Tax Litigation and Arbitration of both individual and corporate clients. Her main practice areas for the past years also comprise Administrative Litigation, namely State Civil Liability disputes as well as current advisory to Portuguese and foreign companies in order to prevent tax disputes.



Dr. Tathiane Piscitelli | Fundação Getulio Vargas' Law School, Brazil

Tathiane Piscitelli studied law at Universidade de São Paulo, where she also concluded her Master and PhD in Tax Law. She is a tax professor at Fundação Getulio Vargas' Law School, teaching and supervising students both in graduate and undergraduate courses. Also at Fundação Getulio Vargas, Tathiane is the co-director of the Tax Law Center of the São Paulo Law School. In this regard, is responsible for a research project on Tax Aspects of the Digital Economy. Since 2017 she has been a regular columnist at Valor Econômico, writing weekly about controversial aspects of tax law. In addition, Tathiane contributes regularly to law journals and book chapters focused on tax law.



PALESTRANTES



Vanessa Rahal Canado | Ministry of Economy, Brazil

Vanessa Rahal is a special advisor of Minister of Economy. Also she is a coordinator of the Center for Taxation of the Center for Regulation and Democracy at the INSPER and Professor at the Law Faculty of Fundação Getúlio Vargas in São Paulo (FGV-SP). She obtained her Master and PhD in Tax law at Pontifícia Universidade Católica, São Paulo. Also Vanessa has experience as tax lawyer at different law firms, including position of Head of Tax Practise at CSMV law firm. Her sphere of inters is focused on both national and international tax systems.

A Exchange Ideas é uma organização internacional de treinamento e rede de contatos em impostos, gerenciamento de patrimônio e conformidade focada em questões práticas e conectando assessores financeiros, escritórios familiares, advogados, curadores e gestores de fundos e investidores, com profissionais líderes e acadêmicos no campo ("provedores de soluções"). A filosofia do Exchange Ideas é fornecer uma plataforma que atenda os dois extremos do relacionamento, conectando membros e permitindo que eles se beneficiem de uma comunidade consultiva, compartilhando tendências, conhecimentos e experiência de forma eficiente e econômica.



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Exchange Ideas

Todos os conferencistas podem participar fazendo perguntas diretamente ou enviando por escrito com antecedência para: info@exchange-ideas.com



Dia e Hora

Quinta-feira, 19 de março de 2020. De 08:30h às 18:30h



Idioma

Devido ao conteúdo e palestrantes internacionais, a conferência será em inglês e português. Ofereceremos serviço de tradução simultânea.



Local do Evento

Hotel Renaissance - Alameda Santos, 2.233 - Jardim Paulista, São Paulo - SP, 01419-002. Para mais informações, acesse o site do hotel [clikando aqui](#).



Inscrições

Inscrições online, [clique aqui](#) ou se preferir, entre em contato com Janaína Meneses (+5511 3723-7300 ou j.meneses@rolimvlc.com)

Valor por participante: **R\$650,00** (*Membros do IBDT, ABDF e outras associações possuem 10% de desconto). Pagando com cartão de crédito será cobrado US\$ 150.



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Email: info@exchange-ideas.com ou j.meneses@rolimvlc.com (Janaína Meneses +55 11 3723-7300)

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