

# Brazilian private clients: recent changes, key challenges, best strategies

**Offshore structures, asset protection, estate planning, digital assets, family governance, banking abroad, tax transparency, high risk clients**

## 9.00 Offshore structures used by Brazilian clients: present and future

- Latest updates and challenges on the offshore vehicles commonly used by Brazilian clients for each purpose/activity. What happened during the pandemic? What are the Brazilian tax authorities currently looking at?
- Relevant changes that will most likely be implemented in the next years for PICs and funds. How to prepare for them? What will be the potential alternatives? Will this be the end of "simple" tax planning structures for Brazilian HNWI?
- Trusts: most recent decisions and how they impact current and future structures. What are the current options, how to setup a Trust with Brazilian beneficiaries and how to mitigate risks while implementing an efficient structure?
- Trends in Brazil for HNWI: will substance requirements change? Are we entering a "new era"? What to expect from a tax inspection standpoint? What happened to the tax reform bill and what to expect from it in 2022 and 2023? What to expect in 2023 based on different election scenarios outcome?

**Fernando Retzler Martins, SA Law, São Paulo**

## 10.15 Asset and estate planning structures: latest decisions, trends, alternatives and effectiveness

- Latest updates and challenges on asset protection and estate planning structures. What shall be avoided from now on? Which structures still offer protection and what goals can effectively be achieved with each estate planning alternative?
- Tax, labor and civil debts in Brazil: how are companies dealing with corporate issues in Brazil and how can shareholders efficiently protect themselves and their wealth from public and private creditors? What are the legal ways to do it and which of them are effective?
- Company succession in family businesses: what are the most recent trends and which instruments can be implemented to efficiently integrate the next generations?
- Gift and Estate Tax: what happened in the past years and what to expect from now on? How to take profit of the most recent court decisions and avoid changes that will most likely impact Brazilian HNWI within the next couple of years? Is it still possible to dodge forced heirship rules? Will there be changes in tax rates and calculation basis?

**Thiago Hohl, Chodraui & Hohl, São Paulo**

11.30 Coffee break

## 11.45 Digital assets: the Brazilian experience and what to expect from now on

- Most recent legal developments and court decisions on the regulatory and tax aspects of cryptocurrencies, NFTs and other digital assets. What has already happened in Brazil, what are the current rules and what is still under discussion?
- Digital assets as an asset protection and estate planning tool: does it work in Brazil? What are the pitfalls and risks? What should

be avoided and how to deal with them?

- Future regulatory and tax implications: will there be obstacles imposed in Brazil for the free use of digital assets? How to avoid exposures, including risks derived from money laundering and other criminal activities? What shall clients and bankers/advisors be aware of?

**Fernando Retzler Martins, SA Law, São Paulo**

13.00 Lunch

## 14.15 Family governance: challenges and opportunities for Brazilian families

- Understanding the Brazilian patriarch and Brazilian families
- Secrecy: father not sharing information on business, wealth...with wife or children
- No estate planning
- Obsession with control and asset protection
- Relationship with business associates
- Divorce issue

**Thiago Hohl, Chodraui & Hohl, São Paulo**

## 15.30 Legal and tax framework within which Brazilian clients operate: key challenges and recent changes

- Banking and investments abroad: opening foreign bank accounts, foreign loans, compliance challenges
- Currency control: changes in the FX legislation
- Tax compliance and tax transparency aspects: automatic exchange of information: current situation and effectiveness of the existing tools

**Fernando Retzler Martins, SA Law, São Paulo**

16.30 Coffee break

## 16.45 Which Brazilian clients are high risk and how to monitor them?

- The issue with the source of wealth
- PEPs and associates of PEP; who falls in the Brazilian definition of PEP; possible illegal dealings of PEPs
- Nominees / straw men
- Settlers of trusts / sham trusts
- Red flags
- Databases

### Case studies

- Onboarding of Brazilian clients
- Transactions monitoring
- Problems that Swiss banks faced when servicing Brazilian clients

**Thiago Hohl, Chodraui & Hohl, São Paulo**

17.30 End of seminar

# Brazilian private clients: key challenges, recent changes, best strategies

## PRACTICAL INFORMATION

**Venue**  
Zurich Sheraton Hotel  
Pflingstweidstrasse 100, Zurich

### Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 21 June in the afternoon. Academy & Finance provides technical assistance before and during the conference: please contact Matheus Amorim at: mamorim@academyfinance.ch

### How to register

by phone: +41 (0) 22 849 01 11  
by fax: +41 (0) 22 849 01 10  
by e-mail: info@academyfinance.ch  
by post: Academy & Finance SA  
PO Box 6069, CH-1211 Geneva 6  
www.academyfinance.ch

### Fees

1080 CHF (+ VAT 7.7%)  
Additional registrations from the same company: - 50%

### Registration and payment

Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

### Substitution & cancellation policy

Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business :

- 8 June refund of 100%
- after 8 June no refund will be made for cancellation.

## REGISTRATION FORM

I register for the conference on «Brazilian private clients» on wednesday 22 June 2022.

I wish to attend online on ZOOM  I wish to attend in the conference room

### FIRST PARTICIPANT

Full name.....

Position.....

E-mail.....

### SECOND PARTICIPANT (-50%)

Full name.....

Position.....

E-mail.....

Company.....

Address.....

Postcode..... City.....

Tel ..... Fax.....

### Person to which the invoice must be sent for payment:

Name..... Email.....

Bank transfer  Mastercard  VISA  AMEX

Credit card No : \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Expiry date : \_\_\_\_ / \_\_\_\_

Cardholder.....

Address of AMEX cardholder .....

Date ..... Signature.....