

Brazilian private clients:

Lula election, key challenges, best strategies

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

9.00 Lula election: impacts, concerns and opportunities. How to be prepared and plan ahead.

- Taxation on dividends: what to expect from now on? Could there be any way out?
- Tax reform: current bill under discussion and new ideas of the future government, including increases in income tax rates. How to be prepared?
- The return of wealth tax discussions: how could clients organize to avoid significant impacts?
- What is the likelihood of even more aggressive changes to be proposed and implemented? What could be the consequences for private clients?

9.30 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 2023? What to expect in 2023 based on different election scenarios outcome?

Fernando Retzler Martins, SA Law, São Paulo

10.30 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

Hotel Président Wilson
47 quai Wilson, Geneva

Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 7 December 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
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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 :

- 1st December refund of 100%
- after 1st December no refund will be made for cancellation.

REGISTRATION FORM

I register for the conference on «Brazilian private clients» on thursday 8 December 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.....

The organisers reserve the right to amend the programme if, despite their best efforts, circumstances oblige them to do so.

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