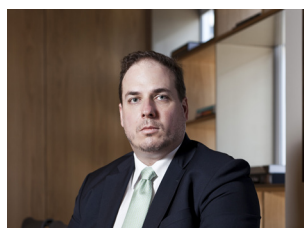


Brazilian clients: tax and estate planning

Recent and upcoming changes, opportunities and strategies

> **How to deal with the 2024 tax reform:** common mistakes, strategies adopted by accountants and lawyers, gray areas, future litigations

> **Most recent changes in the Brazilian legislation impacting HNWI and UHNWI**



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Aftermath of the first Income Tax Return after the introduction of Law n. 14,754/23

- **Main issues we encountered in our 2025 engagements:** common mistakes, strategies adopted by accountants and lawyers;
- **Important concerns and how to mitigate such risks:** gray areas, questionable instructions, future litigations.
- **Potential items currently subject to tax assessments:** what are the tax authorities looking for? What are the topics currently under the spotlight?
- **Risks associated with Financial Statements under IFRS and BR GAAP:** the accounting discussions that most accountants and lawyers are simply ignoring.
- **Tax planning opportunities identified:** decisions that can still be made to optimize the tax burden and reduce risks and exposures.

Most recent changes in the Brazilian legislation impacting HNWI and UHNWI

- **Financial Operations Tax (IOF) on remittances abroad:** what has changed and what are the most recent strategies implemented by Brazilian taxpayers?
- **Tax Authorities' rulings on trusts;**
- **Relevant changes in the taxation of financial investments in Brazil and abroad by Provisional Measure n. 1,303/25;**
- **Gift and Estate Tax (ITCMD):** changes, discussions, strategies and planning opportunities;
- **Introduction of the minimum Income Tax for individuals by Bill n. 1,087/25:** potential consequences derived from the imminent approval of the new taxation, which may heavily impact HNWI and UHNWI.

International Succession: Persons or Assets Abroad – The Brazilian Perspective

- **Legal framework for succession in Brazil** (Civil Code; LINDB – Decree-Law 4.657/1942): Civil Code rules on succession and forced heirship ("legítima"), the distinction between lex domicilii and lex rei sitae, and the role of Brazilian courts when dealing with cross-border estates and recognition of foreign assets.
- **Civil Code reform under discussion** (Senate Commission 2023–2025): Ongoing debate on the reform of the Brazilian Civil Code, with potential changes to matrimonial property regimes and the rules of forced heirship, and their impact on families with assets or heirs abroad.
- **Case studies and practical issues** (STJ case law; CPC 2015): Practical illustrations involving Brazilian residents with assets in the U.S. and EU, heirs living abroad, the challenges of probate delays, risks of double taxation, and the enforcement of foreign decisions in Brazil.
- **Future outlook: How the upcoming tax reform and international reporting obligations (CRS and FATCA) may affect succession planning,** together with the influence of generational transition among UHNW Brazilian families. Special attention will be given to the succession of digital assets and the concept of "digital inheritance", which is gaining importance as families accumulate significant online and intangible assets across jurisdictions.

GENEVA, FRIDAY 5 DECEMBER 2025, HOTEL PRESIDENT, 9.00-12.30 /ONLINE

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I register to the seminar "Brazilian clients: tax and estate planning" on 5 December 2025

☐ I will attend in the conference room ☐ I will attend online on Zoom.

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