Brazilian Private Wealth Planning 2027

New Tax Landscape, Emerging Strategies and Planning Opportunities

Brazil's private wealth landscape has changed substantially over the past three years — and 2026 has brought a new set of practical challenges and planning opportunities for Brazilian HNW and UHNW families. This seminar will focus on **recent developments, emerging structures and strategies currently being implemented**, combining the latest Brazilian tax developments with practical cases and solutions relevant to private bankers, wealth planners, trustees, fiduciaries and international advisers.

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PART I - NEW TAX LANDSCAPE, EMERGING STRATEGIESAND PLANNING OPPORTUNITIES

Foreign Structures after Law 14,754: Emerging Strategies and New Investment Solutions

The market has moved beyond understanding Law 14,754. **The focus is now on new structures, financial products and planning strategies designed for the current tax environment.**

- Practical experience with the taxation of offshore companies, foundations, trusts and other foreign structures — and the main issues emerging in 2026
- Financial instruments as an alternative to direct ownership of underlying investments: certificates, structured notes, bonds and other securities
- International life insurance, capitalisation products and other insurance-based investment solutions
- Tokenised investments and other innovative structures being considered for Brazilian-resident investors
- Brazilian and international investment funds as alternatives or complements to traditional offshore structures
- Practical strategies to optimise taxation, defer taxable events where legally available and reduce tax and compliance risks, including the implications of trading or reallocating assets held within financial instruments and investment structures

The key question for 2027: which new structures and investment solutions can be efficiently used by Brazilian-resident families under the post-Law 14,754 regime?

Dividend Taxation and IRPFM: New Strategies after the First Year in Practice

2026 has brought the first practical experience with Brazil's new taxation of dividends and the Personal Minimum Income Tax (IRPFM). **The focus is rapidly shifting from understanding the legislation to adapting corporate and family structures to the new regime.**

- First practical lessons from the application of dividend taxation and IRPFM in 2026
- Impact on entrepreneurs, family businesses, holding companies and HNW individuals, including cross-border situations
- Participation holding companies and corporate reorganisations designed for the new tax environment
- Accounting strategies and the management and timing of profits, dividends and other corporate distributions
- Lifetime gifts, admission of new shareholders and other corporate and succession-planning alternatives
- Judicial challenges and tax arguments currently being pursued, together with the principal risks and limits of the strategies now being implemented

The key question for 2027: how should business owners and wealthy families redesign their corporate and personal wealth structures under the new regime?

ITCMD Reform: New Rules and Succession Planning Opportunities

Inheritance and gift taxation is entering a new phase in Brazil. The discussion will reflect the legislation and regulations actually in force in December 2026, including any relevant developments enacted between the publication of the seminar programme and the event, with particular attention to São Paulo.

- The new ITCMD framework, including foreign assets, non-resident donors, cross-border estates and international structures
- New valuation rules for closely held companies and their potential impact on family businesses and succession planning
- Lifetime gifts of shares and other assets: when anticipating succession may create significant advantages — and when it may not
- Real estate holding companies and the impact of the new rules on traditional property succession structures
- Life insurance and private pension arrangements as succession-planning instruments
- Use and potential abuse of insurance and pension structures, including areas likely to face greater scrutiny from tax authorities

The key question: how should Brazilian families adapt their succession plans as the new ITCMD framework becomes effective at state level?

Investment Funds: The New Generation of Private Wealth Structures

Following major tax and regulatory changes, investment funds are increasingly being analysed not simply as investment products, but as building blocks for sophisticated Brazilian and international wealth structures.

- Brazilian and international investment funds under the current tax environment
- Funds as alternatives or complements to offshore companies and traditional family holding structures
- Interaction between investment funds, Law 14,754 and the taxation of Brazilian-resident investors
- Accumulation, reinvestment and portfolio management within fund structures
- Governance, succession, asset segregation and integration with broader family wealth structures
- When funds can provide a more efficient planning solution — and the tax, regulatory, cost and compliance limitations that advisers need to consider

The key question for 2027: when should an investment fund replace, complement or become the core of a family's existing wealth structure?

PART II — WHEN LIFE CHANGES THE STRUCTURE
STRESS-TESTING THE GOVERNANCE OF BRAZILIAN FAMILIES

Brazilian families are now redesigning their structures for the new tax regime. But structures are built around the family as it exists today — and families change. Through a single evolving case study, this part follows one Brazilian family through four events and examines the structures being implemented to keep ownership, control and decision-making working when those events occur, together with their risks and how to mitigate them.

After the Liquidity Event: Governing Wealth Without the Business

The sale of an operating company changes more than the family's balance sheet: it removes the governance system around which the family was organised. The focus is now on building decision-making structures for newly liquid wealth before conflicts emerge.

- Family offices, investment committees and investment policy statements: what is actually being implemented by Brazilian families
- Allocating authority between the founder, the next generation and professional managers after the sale
- The founder's new role: from operating CEO to chair of the family's wealth
- Holding company bylaws and shareholder agreements rewritten for a financial, rather than operating, family
- Oversight of external managers, private banks and fiduciaries: mandates, reporting and accountability
- Typical failure points: concentration of power, disengaged heirs and governance that exists only on paper

The key question for 2027: once the business is gone, which structure takes over the decisions the business used to organise?

The Next Generation Goes International: Mobility, Marriage and Divorce

Brazilian families rarely become international by design. Children move abroad, marry foreign nationals and hold their shares from other jurisdictions. The challenge is no longer where the family lives, but whether its structure still works across legal systems that treat marriage, property and control differently.

- Shareholder agreements and family protocols for owners living in several countries: voting, representation and remote decision-making
- The next generation's marital property regimes and their potential impact on shares in family holding companies
- Prenuptial and post-nuptial agreements with cross-border elements: coordinating governing law, enforceability and recognition across jurisdictions
- Non-communicability, inalienability and transfer restrictions: their limits when family assets and divorce proceedings cross borders
- Aligning Brazilian corporate documents with trusts, foundations and other foreign structures held for dispersed beneficiaries
- What may change: the proposed reform of the Brazilian Civil Code and its potential impact on marital property and spouses' succession rights

The key question for 2027: will the family structure survive the divorce of an heir living abroad?

When the Founder Can No Longer Decide: Incapacity Planning in Practice

Wealth planning has traditionally focused on death. Yet incapacity may be the most exposed moment for a structure: the founder is alive and still owns the wealth, but can no longer act. The focus is shifting to instruments that work during the founder's lifetime, not only after it — and new Brazilian rules now require courts to search the national notarial registry for previously executed self-guardianship deeds and curatorship directives.

- Autocuratela and advance directives: documenting the founder's wishes before incapacity, and the limits of advance designation
- How the new CENSEC search requirement affects the drafting and use of these deeds in interdiction proceedings
- Powers of attorney after incapacity: termination of the mandate under Brazilian law, its exceptions, and the practical risk of institutions acting before they become aware of the event
- Corporate provisions for replacing directors and managers of family holding companies
- Protectors, trustees and foundation councils: what the structure's own documents provide when the settlor or founder becomes incapacitated
- Identifying structures that depend on a single individual, and how to remove that dependency

The key question for 2027: if the founder cannot sign tomorrow, who has legal authority to act, and will institutions recognise it?

The Day After: Making the Structure Work When the Founder Dies

Death remains the ultimate stress test. Beyond tax and succession planning, the practical question is whether the family and its advisers can operate in the days and weeks that follow. Recent changes to Brazil's extrajudicial inventory rules have created new tools — subject to specific conditions — for that critical period.

- Extrajudicial inventory after CNJ Resolution 571/2024: the new possibilities — and conditions — for estates involving minors, incapacitated heirs and wills
- Selling estate assets before partition without judicial authorisation: the new mechanism for funding taxes, legal and notarial fees and other inventory expenses, and its statutory conditions
- The gap between death and the appointment of the estate administrator: who runs the companies and instructs the banks?
- Pre-designated managers and continuity provisions in holding companies and foreign structures
- Conflicting instructions from heirs, the surviving spouse, trustees and directors: identifying authority before institutions act
- Digital assets and hidden wealth: identification and access as an emerging succession risk

The key question for 2027: on the Monday after the founder's death, can the structure actually operate?

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An invoice will be sent to you by email following registration. Payment is made by bank transfer or credit card.

I register to the seminar "Brazilian private wealth planning 2027" on 10 December 2026

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

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