

A person in a suit is shown from the chest down, holding a calculator. The background is a cityscape at night, with buildings and lights. The entire image is overlaid with a semi-transparent red color. The text 'Trench Rossi Watanabe.' is in the top left corner, and 'TAX PLANNING & CONTROVERSIES' is in the bottom right corner, with the website 'trenchrossi.com' below it.

**Trench
Rossi
Watanabe.**

TAX PLANNING & CONTROVERSIES

trenchrossi.com

PLANNING FOR SUCCESS

In a connected world, navigating Brazil's unique tax system can be particularly complex. Economic instability, unilateral positions adopted by the Brazilian Government in international taxation, increasing government scrutiny and the global implications of the OECD's Base Erosion and Profit Shifting project are just a few of the challenges that multinational companies face while establishing and defending their tax structures in Brazil.

Founded almost 60 years ago, Trench Rossi Watanabe's tax lawyers use their local knowledge and global perspective to help companies manage risk and strengthen

their tax positions in Brazil, Latin America and worldwide.

We work across practice areas to provide unmatched advice on tax positions, use of tax treaties, tax compliance and tax structuring on projects and in mergers, acquisitions and reorganizations. We also advise on social security taxation, import and export issues, transfer pricing, VAT, expatriate compensation, and on individual tax matters. In every case, we tailor our advice to your industry and business objectives.



TRUSTED TAX ADVICE

INTERNATIONAL STRUCTURING

We advise companies on tax treaties and cross-border transactions, as well as design global tax structures for multinationals, with overseas operations and investments.



She is extremely efficient in income tax and transactional mandates, remains very active in the market and has great technical knowledge

Client in **Chambers Latin America** about **Simone Musa**, São Paulo Tax Partner.

TAX FOR M&A AND REORGANIZATIONS

We provide tax planning for Brazilian and foreign multinationals during mergers, acquisitions and corporate restructurings. The business and accounting backgrounds of our tax lawyers enable us to provide creative, tax efficient structures that align with your business strategies and objectives.



He is an excellent lawyer who delivers a great service and has profound knowledge of the area; he seeks alternatives and puts himself in the client's shoes.

Chambers Latin America about Porto Alegre Tax Partner **Claudio Moretti**.

IMPORTS AND EXPORTS

We advise companies on customs valuation, tariff classification, rules of origin, drawbacks, export and import controls, and foreign trade agreements. We also provide counsel on tax efficient ways to structure supply chains.



He always goes the extra mile for us and is instrumental in making our desired deals happen.

Chambers Latin America about Porto Alegre Tax Partner **Thales Stucky**

TRANSFER PRICING

We advise companies on compliance with Brazilian transfer pricing rules as well as complex cross-border transfer pricing projects involving multiple jurisdictions. We also represent clients in transfer pricing disputes.



She is very efficient at meeting deadlines, has outstanding legal knowledge and all clients enjoy working with her.

Client in **Chambers Latin America** about Sao Paulo Tax Partner **Clarissa Machado**

TAX LITIGATION

We advise clients at all stages of disputes with the Brazilian tax authorities, from audit through resolution. As seasoned tax litigators, we represent companies in both judicial and alternative dispute resolution proceedings, where clients not only benefit from our deep understanding of procedural rules and substantive issues, but our ability to provide creative solutions.



A trustworthy and proactive tax lawyer with substantial experience in both the academic and judicial spheres.

Client in Chambers Latin America about Sao Paulo Tax Partner **Marcos Neder**



We really value his tax litigation skills. Not only does Sehn offer us a strong knowledge of tax law, he also uses his experience to design successful legal strategies.

Client in Chambers Latin America about Sao Paulo Tax Partner **Paulo Sehn**

FINANCIAL SERVICES INDUSTRY

We assist major financial institutions in the Brazilian and international markets as well as advise them on the regulation and taxation of financial institutions, financial products and transactions.



SOCIAL SECURITY TAXATION.

We represent companies in judicial and administrative hearings involving social security disputes and help them find dynamic, efficient solutions to multi-disciplinary matters involving tax, social security, private pension and labor law.

INDUSTRY EXPERTISE

We view your business the way you do, with tax practitioners who specialize in advising companies in key sectors of the Brazilian economy, including oil & gas, mining, energy and infrastructure, pharmaceuticals and health care, IT and communications, agribusiness, automotive and sporting events.



*She is deeply
respected by
her clients*

Client in **Chambers Latin America** about Rio de Janeiro Tax Partner **Maria Fernando Furtado**



AWARDS AND RECOGNITION

CHAMBERS LATIN AMERICA

Sources say: "their ability to strike the right balance between a conservative and an assertive approach," adding: "They tackle our cases with a business-driven and multidisciplinary strategy, in addition to being very attentive, responsive and highly knowledgeable." Partners Clarissa Machado, Simone Musa, Paulo Sehn and Marcos Neder are recognized as notable practitioners.

ANÁLISE ADVOCACIA 500

The 2017 edition conducted an interview with more than 700 representatives of the major companies in Brazil. Trench, Rossi e Watanabe Advogados appears in all the 12 areas researched by the publication, including the Tax area, as "One of the most admired law firms in the country". Our Partner Simone Musa is the 3rd most admired attorney in the Tax area in Brazil;

LEGAL 500

The publication has ranked our Tax practice as tier 2 and recommended the firm stating that: The 'dedicated and engaged' team at Trench Rossi Watanabe saw organic growth with the promotion to partner of two associates: Thales Stucky and Reinaldo Ravelli. The team has significant senior-level resource, including global head of tax Simone Dias Musa and tax litigation head Paulo Rogério Sehn, and is well served by a number of experienced associates. As part of a strong international office network, the team is particularly active in cross-border transactional work, and it also has a notable tax litigation practice. Tax planning expert Juliana Porchat de Assis is also recommended.

INTERNATIONAL TAX REVIEW

INTERNATIONAL TAX REVIEW 2016

The Firm was awarded Latin America Tax Firm of the Year.

INTERNATIONAL TAX REVIEW 2017

The Firm was awarded Latin America Indirect Tax Firm of the Year.

2018 TRANSACTIONAL TAX RANKINGS

ITR recognized our Firm as tier 1 in transactional work.

2018 INDIRECT TAX LEADERS

Adriana Stamato, Alessandra Machado, Maria Fernanda Furtado, Simone Musa and Thales Stucky

TAX CONTROVERSY LEADERS 2017

Paulo Sehn, Marcos Neder, Claudio Moretti and Mariana Vito.

CHAMBERS GLOBAL 2019

Our global Tax practice, which is led by Brazilian partner Simone Musa, is ranked as Band 1, Global-Wide.

LATIN LAWYER 250

According to Latin Lawyer our Firm is a leader in Tax area. "Trench Rossi has effectively leveraged Baker McKenzie's global network to make tax one of the jewels in its service offering crown. The firm is regularly called in to join or lead global or regional teams analysing corporate restructuring and the various tax benefits." Clients recommend lawyers: Paulo Sehn, Simone Musa, Marcos Neder, Maria Fernanda Furtado, Claudio Moretti and Clarissa Machado.

LATIN LAWYER'S ELITE LEADERSHIP REPORT

A sócia Simone Musa é parte do Latin Lawyer's Elite Leadership Report, que une líderes dos escritórios mais relevantes da América Latina para discutir as mudanças no setor e como desenvolver o mercado jurídico.

LEADERS LEAGUE

The Firm was recognized as Leader in Corporate Tax and Tax Litigation. Partners Paulo Sehn, Simone Musa and Marcos Neder are highlighted as leaders in Tax Litigation. Partners Simone Musa, Clarissa Machado and Adriana Stamato are leaders in Corporate Tax.

LACCA APPROVED

Partners Paulo Sehn, Clarissa Machado and Marcos Neder are recognized.

WORLD TRANSFER PRICING TP WEEK/ITR 2017

The Firm is ranked as tier 1 in Transfer Pricing.

WORLD TAX – ITR 2017

The firm is ranked as tier 1 in the transactional area and tier 2 in World Tax and Tax Controversies.

WOMAN IN TAX LEADERS 2017 – ITR

Lawyers Simone Musa, Clarissa Machado, Maria Fernanda Furtado, Alessandra Machado, Adriana Stamato and Priscila Faricelli were recognized by International Tax Review as leaders in the Tax practice in Brazil

TAX PARTNERS

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