

TAX

Trench Rossi Watanabe has one of the most reputable tax departments in Brazil, led by renowned professionals.

Our team has a robust background, both in Brazil and abroad, offering comprehensive advisory and litigation services to companies from different industries and segments, including foreign and Brazilian multinationals.

A recognized leader in complex tax advice, including support for multijurisdictional acquisition and merger projects, our firm has a team experienced in international taxation, and knowledgeable about topics such as BEPS, state aid, transfer pricing and international treaty interpretation. This experience, coupled with our strategic partnership with the Baker McKenzie network, allows us to offer creative and comprehensive tax solutions tailored to our clients' needs.

Trench Rossi Watanabe also has a consolidated position in local and global transfer pricing issues, both in litigation and advisory. Our firm has worked proactively to align Brazilian transfer pricing legislation with OECD guidelines.

Our tax litigation practice deserves special mention for its impeccable performance in the administrative and judicial courts, including high courts. With a practice focused on the interests of our clients, our professionals have obtained important decisions, working proactively and in line with the most modern and effective alternative dispute resolution methods especially transactions and procedural legal agreements signed with the tax authorities.

In addition, our firm is recognized for its work on social security issues, indirect taxes and asset management, with a team fully dedicated to cases of this nature.

Trench Rossi Watanabe has a pro bono committee that directs its efforts toward legal assistance for nonprofit organizations with an impact on our local communities. Our tax team plays a key role in this, as much of the work involves tax aspects.

The diversity and competence of our team is recognized by the most prestigious rankings and directories in the world, reflecting the difference we make and our commitment to social transformation and excellence in serving our clients.

HOW WE CAN HELP

- **International structuring.** We advise on interpreting international treaties to avoid double taxation, and on structuring cross-border transactions and internationalization projects.
- **Tax planning in M&A and reorganizations.** We help our clients structure their mergers, acquisitions and divestments in an efficient, creative and secure manner.
- **Imports and exports.** We advise companies on customs valuation, tariff classification, rules of origin, export and import controls and foreign trade agreements. We also provide counsel on tax-efficient ways to structure supply chains.
- **Transfer pricing.** We advise companies on complying with Brazilian transfer pricing rules, as well as on complex international transfer pricing projects involving multiple jurisdictions. We also represent clients in disputes related to this issue.
- **Tax litigation.** We advise clients in all stages of disputes with the Brazilian tax authorities, from the beginning of an inspection to the end of the case in the courts. We also look for opportunities for our clients, advise on and encourage alternative methods of resolving disputes, and monitor and publish weekly reports on the agendas of the supreme courts.
- **Taxation of financial operations.** We advise the main financial institutions in the Brazilian and international markets, as well as provide advice on regulatory and tax issues relating to financial institutions, financial products and transactions.
- **Social security.** We advise clients on payroll diagnostics, stock options and retention policies, as well as all litigation matters.
- **Industry expertise.** We have a strategic vision, with professionals from the tax planning practice who are experienced in advising companies in key sectors of the Brazilian economy, such as oil and gas, energy, infrastructure, pharmaceuticals and healthcare, IT and communications, agribusiness and automotive, where we have worked with major players in the industry, in several cases of great national and international relevance.

AWARDS

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