

International Area

RONALDO
MARTINS
& Advogados

With an International Desk Services platform, RONALDO MARTINS & Advogados has developed a customized management of cases involving international matters - both nationalization and internationalization, advising companies in Brazil and abroad, in all multidisciplinary legal services and international transactions, as well as in complex transnational issues. It has its own offices in Brazil and in the United States of America and maintains partnerships with law firms in the main countries through which, together with its knowledge of tax systems, trade and control of imports and exports, defense of competition and anti-corruption laws, it offers innovative solutions for clients seeking to do business on a local or global scale.

Scope: Development and coordination of multidisciplinary and multijurisdictional work involving multinational clients through integration with the firm's several legal areas.

FIRM'S EXPERTISE

- **Corporate:** Corporate acts involving Mergers & Acquisitions, partner agreements, shareholders and other corporate types.
- **M&A:** Structuring of operations of purchase and sale of companies and legal auditing (Due Diligence); / Review of the operation with CADE.
- **Foreign investments and Brazilian investments abroad:** Feasibility of investments and regularization before the Central Bank of Brazil.
- **International Contracts:** Structuring and negotiation of complex contracts; restructuring of international operations (joint ventures, international franchising, international purchase and sale, distribution and agency).
- **Compliance:** Advisory on the implementation of corporate compliance programs.
- **International arbitration and dispute settlement.**
- **International tax planning.**
- Client representation in obtaining licenses and technology transfers, including protection of trade secrets.
- Mitigation of legal risks associated with the use, transmission and storage of information and data; global program of information security and privacy (Cyber Security).
- **Immigration:** Visas for investors and technical visas for temporary and permanent work.

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INTERNATIONAL TAXATION

- International Taxation - Legal Entity and Individual.
- International Tax Planning - Individuals and Legal Entities
- Internationalization of Companies
- Migration and change of tax residence for individuals
- Taxation on Foreign Investments
- Automatic Information Exchange - FATCA, CRS & BEPS
- Conciliation of Multi-jurisdictional Tax Conflicts:
- Corporate Income Tax
- Individual Income Tax
- Tax on Capital Gains
- Property Taxes
- Taxes on Succession and Donations
- Taxes on Payments Received Abroad
- Application and impacts of CFC - Controlled Foreign Companies Rules
- Incorporation of Holding Companies and Operating Companies
- Structuring of International Financing
- Tax treatment for Royalties, Technical Support and Services paid abroad
- International Bilateral and Multilateral Agreements and Agreement to Avoid the Double Taxation
- General Anti-elision Rules
- Operational Models and Structures, Corporate and Permanent Facilities' Profit.

- Tax Efficiency Planning in multi-jurisdictional Mergers and Acquisitions.
- International Trade
- Import and Export of Goods and Services
- Equalization of accounting-tax criteria between multi-jurisdictional operations
- Tax Offenses





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The team has a global vision and counts on the collaboration of several partners specialized in the following areas: BPO, auditing, process management, financial activities with BNDES, FINAME, FINEP and investment banks; business training, logistics in the import and export of goods and services, financial services for restructuring liabilities in order to identify and avoid situations that may slow down or hinder corporate transactions and business, ensuring the legality and efficiency of the structure and business model.

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