

International

RONALDO
MARTINS
& Advogados

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Desk Services (Ids)

With the *International Desk Services* (IDS) platform, RONALDO MARTINS & Advogados provides personalized management of cases involving international matters - both nationalization and internationalization - advising companies in Brazil and abroad on all multidisciplinary legal services and international transactions, as well as complex transnational issues.

With its own offices in Brazil and the United States, RONALDO MARTINS & Advogados - with its knowledge of tax systems, corporate law, trade and import and export controls, competition defense and anti-corruption laws - maintains partnerships with legal firms in the main countries, through which it offers innovative solutions to clients seeking to do business on a local or global scale.

Scope: Development and coordination of multi-jurisdictional work through integration with the firm's various legal areas.

IDS EXPERTISE:

- **Corporate:** articles of association of companies and publicly traded companies, shareholders' agreements and other types of company;
- **M&A:** structuring of mergers & acquisitions operations and due diligence; review of the operations with the Administrative Council for Economic Defense (Cade);
- **Foreign investments and Brazilian investments abroad:** viability of investments and regularization before the Central Bank of Brazil;
- **Capital market:** capitalization and investment funds;
- **International contracts:** structuring and negotiation of contracts; restructuring of international operations (joint ventures, international franchising, international purchase and sale, distribution and agency);
- **Compliance:** advisory services on the implementation of corporate compliance programs;
- **International arbitration and settlement of disputes:** working with the main mediation and arbitration chambers;
- **International tax planning;**
- Representation of the client in obtaining licenses and technology transfers, including the protection of trade secrets;
- **Immigration:** investor visas and temporary and permanent technical work visas.

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INTERNATIONAL TAXATION

- International taxation – Legal entities and Individuals.
- International tax planning – individuals and legal entities:
 - Internationalization of companies;
 - Migration and change of tax residence for individuals;
 - Taxation on investments abroad.
- Exchange of automatic information – Foreign Account Tax Compliance Act (FATCA), Common Reporting Standard (CRS) & Base Erosion and Profit Shifting (BEPS).
- Conciliation of multi-jurisdictional tax disputes:
 - Corporate income tax;
 - Individual income tax;
 - Tax on capital gains;
 - Tax on property;
 - Estate and gift taxes;
 - Taxes on payments received abroad.
- Application and impacts of Controlled Foreign Companies (CFC) Rules
- Incorporation of holding companies and operating companies.
- Structuring of international financing.
- Tax treatment for royalties, technical support and services paid abroad.
- Bilateral and multilateral international agreements and agreements to avoid double taxation.

- General anti-tax avoidance rules.
- Operating models and structures, corporate profit and permanent facilities.
- Planning for tax efficiency in multi-jurisdictional mergers and acquisitions.
- International trade:
 - Import and export of goods and services.
- Equalization of accounting and tax criteria between multi-jurisdictional operations.
- Tax offenses.





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The RONALDO MARTINS & Advogados team has a global vision and relies on the collaboration of several partners specialized in the following areas: Business Process Outsourcing (BPO); auditing; process management; financial development activities with the National Bank for Economic and Social Development (BNDES), the Financing Fund for the Acquisition of Industrial Machinery and Equipment (Finame), the Studies and Projects Financing Agency (Finep) and investment banks; corporate qualification, logistics in the import and export of goods and services; financial services for the restructuring of liabilities aimed at identifying and avoiding situations that could delay or make corporate transactions and businesses unfeasible, guaranteeing the legality and efficiency of the structure and business model.

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