



Brazilian National Confederation of Industry

TAX TREATIES IN THE BRAZILIAN TAX SYSTEM: HOW TO ENABLE ENVIRONMENT FOR FDI

Brasília, DF, June 24th 2009
CNI's Headquarters - SBN, Bloco C, 15^o floor

AGENDA

9:00 – 9:15 Opening session

- José Augusto Coelho Fernandes – Executive Director of the Brazilian National Confederation of Industry (CNI)

Panel 1

9:15 – 10:45 Tax Treaties: international models, recent trends and impacts on international integration

Present an overview of the international models for tax treaties (OECD, UN, North American, European and Andean models), new topics in the international debate and main aspects related to Brazilian FDI.

- Prof. Peter Byrne – Lataxnet
- Roberto Pasqualin – Pasqualin Advogados
- Nélio Weiss – PricewaterhouseCoopers
- Reeve Wolford – Altrius Group LLC

Questions and Answers

10:45 – 11:00 Coffee Break

Panel 2

11:00 – 13:00 Tax issues in direct investment: obstacles faced by companies

What are the main problems faced by companies with the Brazilian tax system (consolidation filing for related companies, deferral of gains, "legal certainty", taxation of income at source, transfer pricing, tax haven legislation, limits on deduction of interests and royalties, concepts of permanent establishment, taxation of cross-boarder services, etc).

- Michael Lehmann – Volkswagen
- Robert Sparks – Delphi
- Werner Stuffer – PricewaterhouseCoopers AG
- Elizabeth Ramos – Shell
- Bruno Machado Ferla – Camargo Correa
- Francisco de Assis e Silva – JBS Friboi
- José Antonio Valiati – Marcopolo

Debate

13:00 – 14:00 Lunch





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Panel 3

14:00 – 15:30 Brazilian Government Perspectives

What are the main topics in the Brazil's official agenda? What are the main obstacles for progress in the negotiations of a bilateral tax treaty with the US? What are the problems faced in the administration of tax treaties with European countries (ex. Germany)? How to improve transfer pricing legislation? Why the deferral of gains is not allowed for Brazilian companies investing abroad?

- Marco Aurélio Pereira Valadão – General Coordinator for International Affairs, Secretariat of the Federal Revenue

Comments:

- Roberto Pasqualin – Pasqualin Advogados
- Francisco de Assis – JBS Friboi
- Marcos Biondo – Grupo Gerdau

Debate

Panel 4

15:30 – 16:30 Priorities and Recommendations for a Brazilian agenda on tax treaties and taxation of FDI

This section should highlight the main findings and identify a business agenda for improving Brazilian tax system related to FDI: tax treaties, transfer pricing legislation and domestic regulation.

- José Augusto Coelho Fernandes – Executive Director, CNI
- Werner Stuffer – PricewaterhouseCoopers AG
- Roberto Pasqualin – Pasqualin Advogados

