Latin American Business Centre

LatAm Tax Desk for EMEIA

Ernst & Young, LLP



^{2nd} Semester 2018 EMEIA Tax Centre

Global Tax Desk Network

As competition in global markets becomes more intense, companies are under everincreasing pressure to undertake crossborder transactions to expand their business structures internationally, either through organic growth or acquisition. This drive towards globalization means companies are increasing the number of transactions on which they need international tax advice to remain competitive. The Global Tax Desk Network can help add value to clients facing these challenges.



The EMEIA Tax Centre (ETC)

The EMEIA Tax Centre (ETC) operates as a hub of highly experienced tax professionals from across EMEIA with a primary focus on expanding our service capability and speed to market for Global 360 Accounts.

Designed to support and enhance the efforts of our EMEIA Region tax professionals in pursuit and client service activities, the ETC offers increased access to leading-edge thinking and truly borderless service for our clients.

DOW

LatAm Tax Desk for EMEIA

The LABC is staffed by tax professionals from the most important economies in Latin America, who provide tax advice on business and investments in and through the region.

Our Desk is a real-time resource that our Tax Account Leaders (TALs) and other professionals can use to gain in-depth tax advice on the laws of the foreign desk's home jurisdiction. With a central hub in London, it is ideally suited to assist local tax teams and TALs to develop tax-effective structuring of multi country transactions.

Our presence in EMEIA and strong links with the EY Global Tax Desk teams in the Americas and Asia-Pacific significantly differentiates us from our competition.

pow

^{2nd} Semester 2018 EMEIA Tax Centre

How can we help?

We can guide clients through the complex tax issues they face when engaged in international trading. Recent examples where clients have requested in-depth advice include:

- Advice on tax structuring, Permanent establishment issues, capital repatriation, mobility and other tax related issues.
- Cross-border investment and financing/refinancing structures.
- Business reorganizations and restructurings.
- Assistance with cross-border M&A and divestiture structuring.
- Post-merger Integrations.
- International treasury and cash flow planning (e.g., cash mobility, in-house banking, and foreign currency matters).
- ► Local country tax analysis (e.g., R&D and investment incentives, global taxation provisions, thin capitalization and withholding analysis).
- Holding company and income tax treaty analysis including withholding tax planning.
- Transfer pricing, business and asset migrations, and tax effective supply chain management (TESCM) projects.
- Integrated teams of LatAm tax professionals based in London providing realtime, multilingual assistance to EY clients and network.
- Individual meetings at client sites, conferences, global strategy sessions and think tanks.
- Parallel and coordinated services with our tax professionals based in EMEIA to provide well-rounded advice.



Benefits for Clients

The Global Tax Desk Network is available to support you and your clients by:

- Addressing one-off, local country queries or providing in-depth holistic advice on tax-efficiently structuring international transactions.
- Supplying real-time, multilingual advice through access to foreign tax specialists without time-zone restrictions that may otherwise apply.
- Working as multi country Desk teams from EMEIA and other EY Areas to provide more comprehensive answers than would likely be possible if the tax issues for each country were addressed solely by the country involved.
- Brainstorming the tax implications across the full range of business transactions from international tax strategies for single countries, to developing a global tax strategy, to offering a new idea or perspective on an issue.
- Supporting TALs and audit engagement teams with the review of multinational transactions as part of the audit of our Channel 1 tax provisions.
- Presenting at EY internal events and client facing events.

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. For more information about our organization, please visit ey.com.

EY | Assurance | Tax | Transactions | Advisory

© 2018 EYGM Limited.

All Rights Reserved.

ey.com

About EY

Working with the ETC

The EMEIA Tax Centre (ETC) operates as a hub of highly experienced tax professionals from across EMEIA with a

primary focus on expanding our service capability and speed to market for Global 360 Accounts.

Designed to support and enhance the efforts of our EMEIA Region tax professionals in pursuit and client service activities, the ETC offers increased access to leading-edge thinking and truly borderless service for our clients.

Service offerings within the ETC:

- ► Corporate Secretarial Support Services
- EU Tax Services
- ▶ Global Compliance and Reporting
- Global Mobility
 - Assignment Services
 - Data Analytics
 - Global Compensation Services
 - ► Global Immigration
 - ► International Social Security
- ► Global Trade
- ► Global Tax Desk Network
- Intercompany Effectiveness
 Japan Business Services
- ► Law
- Operating Model Effectiveness
- Quantitative Services
- ► Tax Performance Advisory
- Tax Policy





José Manuel Padilla Partner International Tax Services Leader of the Latin American Business Centre, EMEIA Office: +44 2077 609253 Mobile: +44 7831 136571 jpadilla@uk.ey.com



Pablo Baroffio Senior Manager International Tax Services Latin American Business Centre, EMEIA Office: +44 2079 518909 Pablo.baroffio@uk.ey.com



Camilo Garavito Senior Manager International Tax Services Latin American Business Centre, EMEIA Office: +44 20 7760 5215 Camilo.Garavito@uk.ey.com



Hector Hermosillo Machuca Manager International Tax Services Latin American Business Centre in Spain, EMEIA Office: + 44 2079 516155 hhermosillomachuca@uk.ey.com



Gerardo del Rincón Manager International Tax Services Latin American Business Centre, EMEIA Office: + 44 2079 514780 Gerardo.del.rincon@uk.ey.com



Margarita Miceli Senior International Tax Services Latin American Business Centre, EMEIA Office: +44 2079 515167 Margarita.miceli@uk.ey.com

German Liaison



Frank Retzlaff Partner Office: + 49 40 36132 11264 Frank.Retzlaff@de.ey.com



Fabian Kuhnt Manager Office: +49 40 36132 25945 Fabian.Kuhnt@de.ey.com



Our team

Felipe Bastos Fortes Partner International Tax Services Leader of the Brazil Tax Desk, EMEIA Office: +44 2079 800534 Mobile: +44 7990 673569 ffortes@uk.ey.com

Andres Alba Senior Manager International Tax Services Latin American Business Centre, EMEIA Office: + 44 2079 800374 Andres.alba@uk.ey.com

