

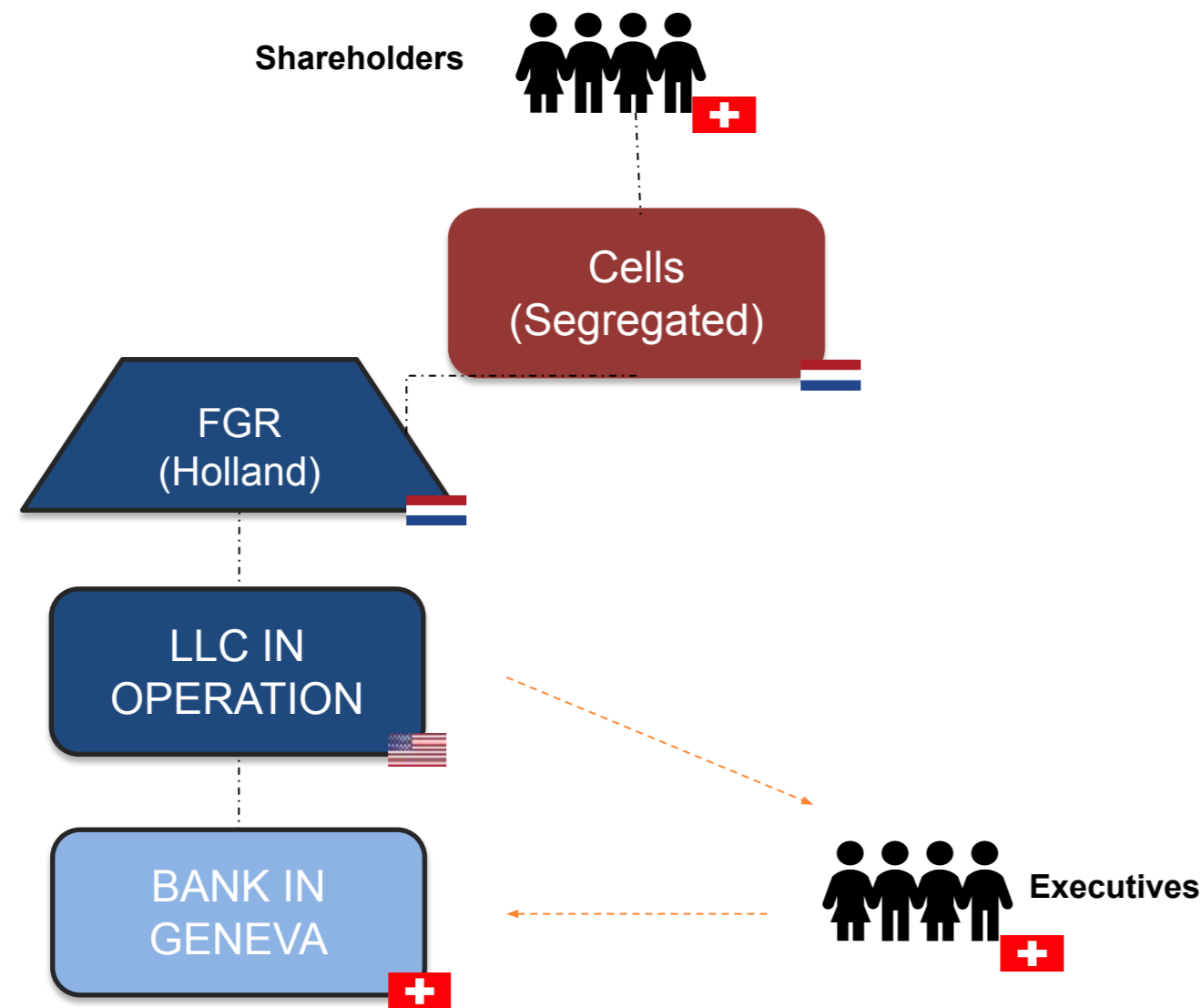


PARADIGMA CONSULTING

Structures of Interest and Success Stories

SUCCESS STORIES: SWISS BANK

Operation

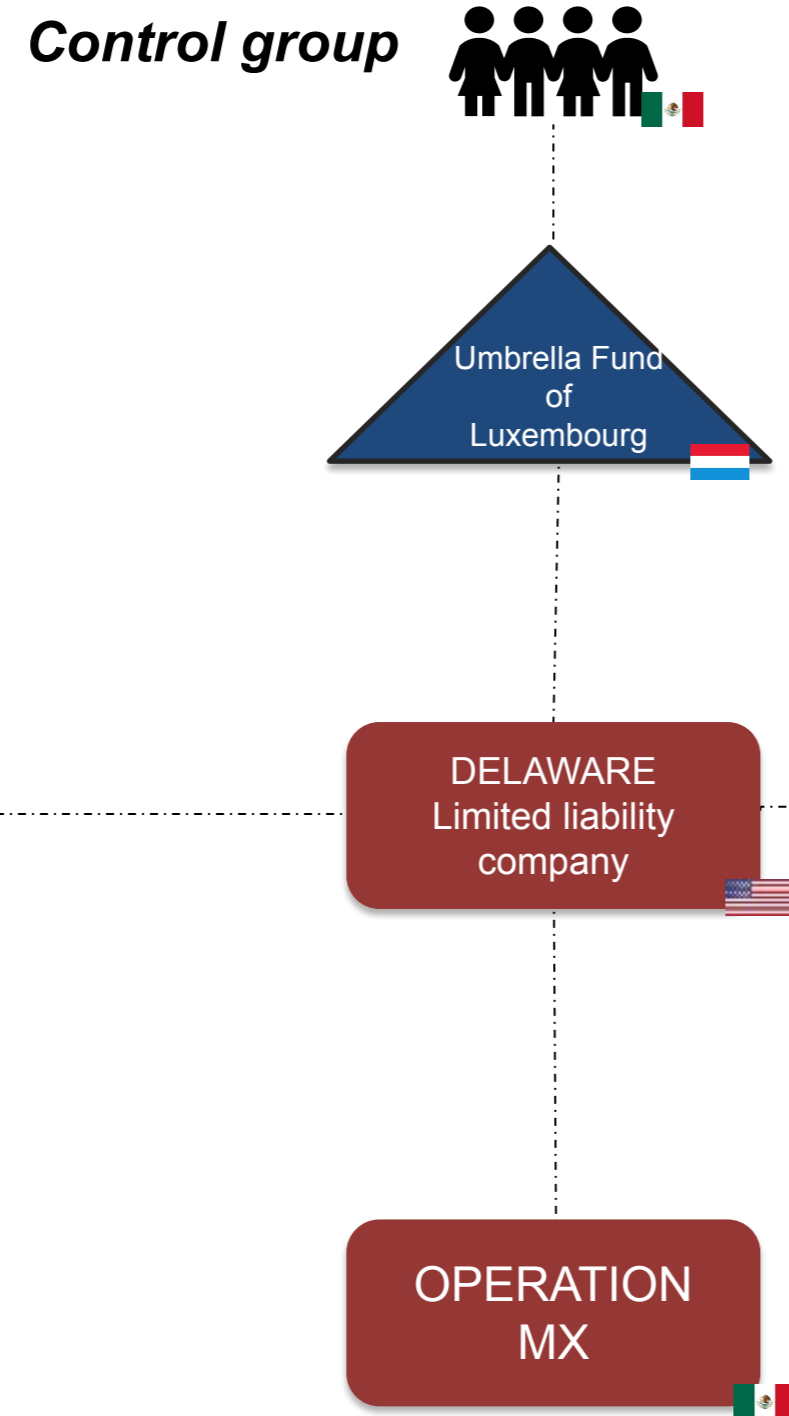


Restructuring and adaptation to new regulatory frameworks

- **Sale of the trust**
Due to regulatory changes, the bank was forced to sell its trust unit to comply with current regulations.
- **Closing of international accounts**
The signing of new international treaties forced the bank to close the accounts of clients served at its desks in Mexico, Brazil, and Argentina, due to tax and transparency requirements.
- **Creation of a new service structure**
To address this situation, a structure was developed that allowed:
 - Monetize client referrals to specialized tax advisors, who helped them adapt their structures to comply with new tax standards.
 - Selling offshore companies and other legal services to the same clients, generating additional income for the bank.
- **Distribution of benefits**
The delta generated by these activities was distributed to the fund, and in turn, to the cells of each shareholder, thus maximizing returns for investors.

SUCCESS STORIES: HYDROCARBONS MEXICO

Operation

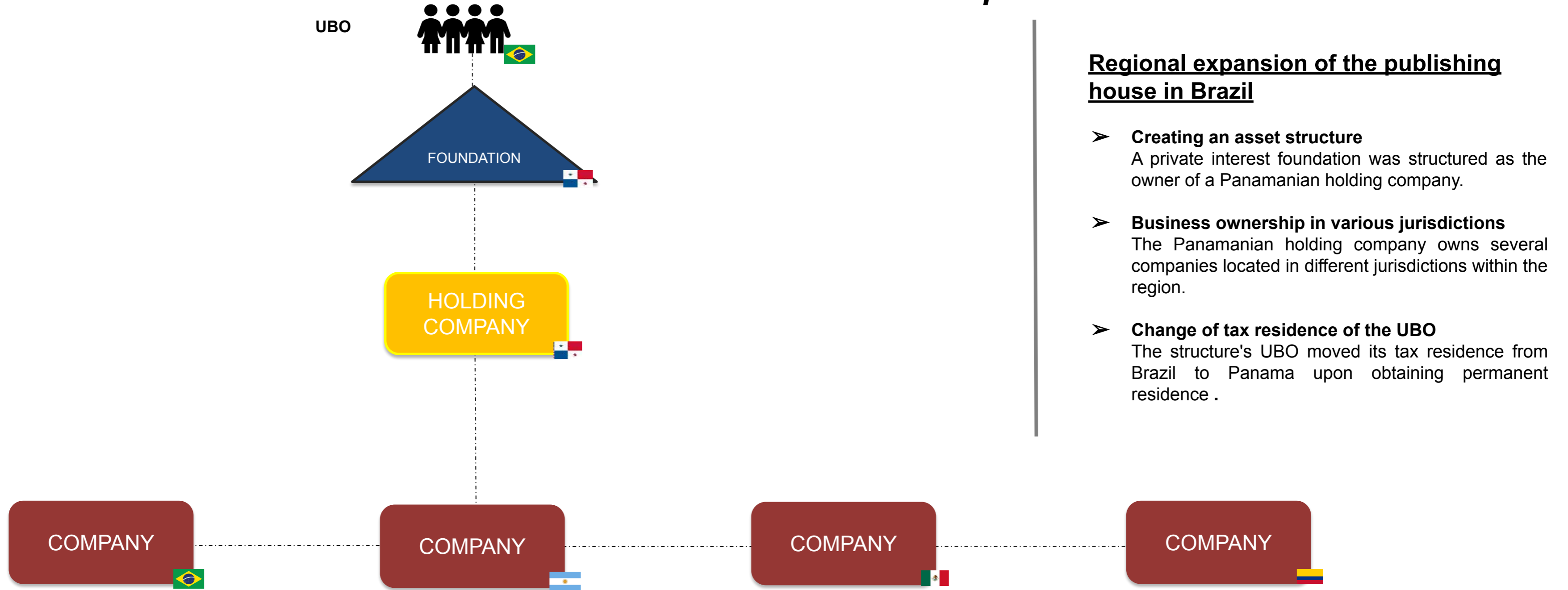


Restructuring of a hydrocarbon company in Mexico

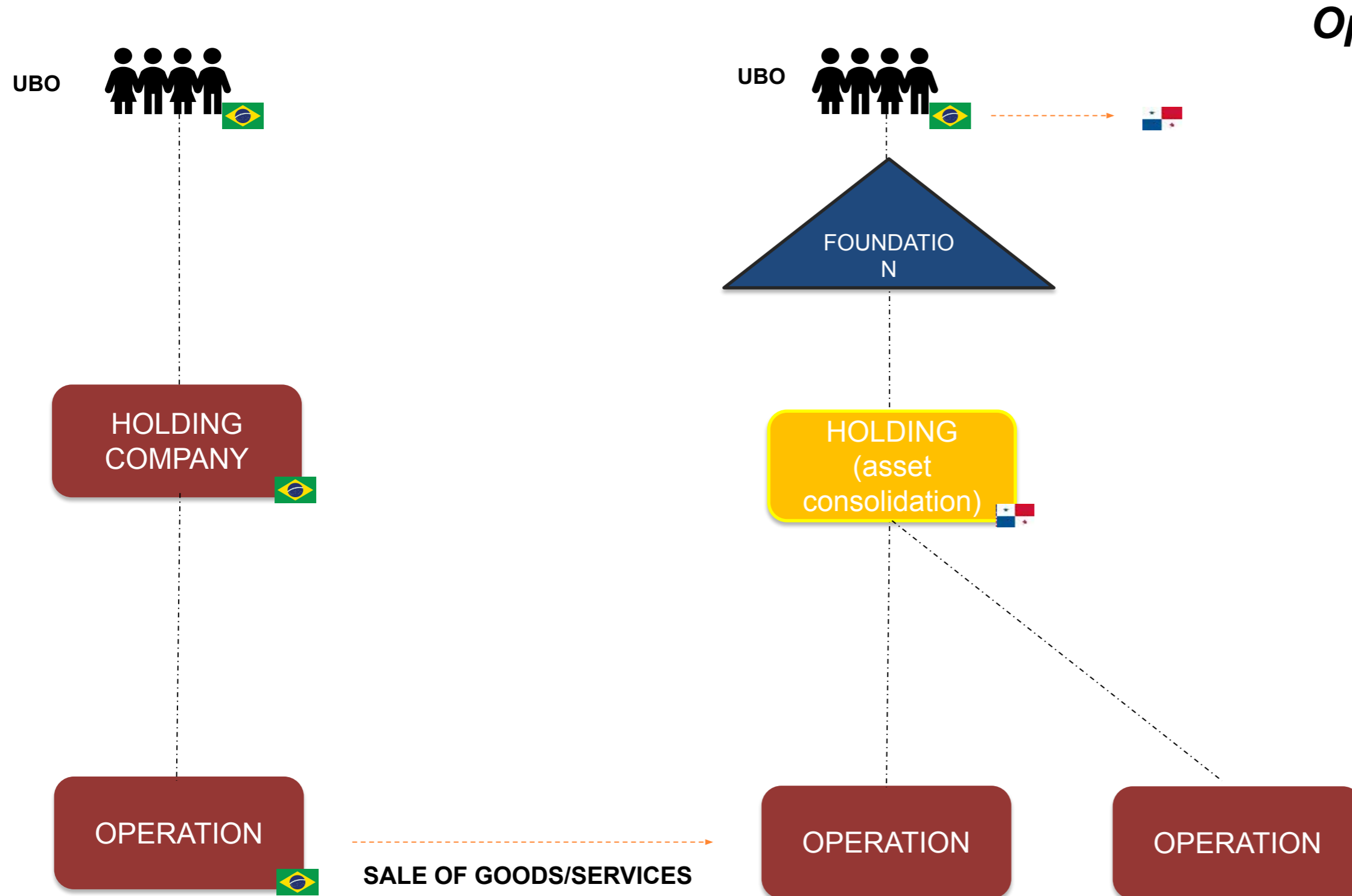
- **Disorganized growth**
The hydrocarbon exploitation company experienced disorganized growth, which revealed an opportunity to optimize its operating structure.
- **Key functions**
. Strategic functions were initially managed within the parent company, but could be transferred to independent companies. By locating these new entities in jurisdictions that are more favorable for logistical and tax reasons, they could generate significant savings.
- **Company Creation in Panama**
To take advantage of these benefits, two new companies were created in Panama:
 - **Human Resources Company** : Manages all group personnel from Panama.
 - **Geological Studies Company** : Performs the geological analyses required for operations.
- **Billing and tax benefits.**
Both companies in Panama bill their services to the mining operations in Mexico. This arrangement not only allows them to maintain a profit margin in Panama, but also achieves significant tax savings by avoiding billing the parent company in Mexico.

SUCCESS STORIES: EDITORIAL BRASIL

Operation



STRUCTURE OF INTEREST : LIMITATIONS TO JURISDICTIONAL RISK



Operation

Limitations to jurisdictional risk

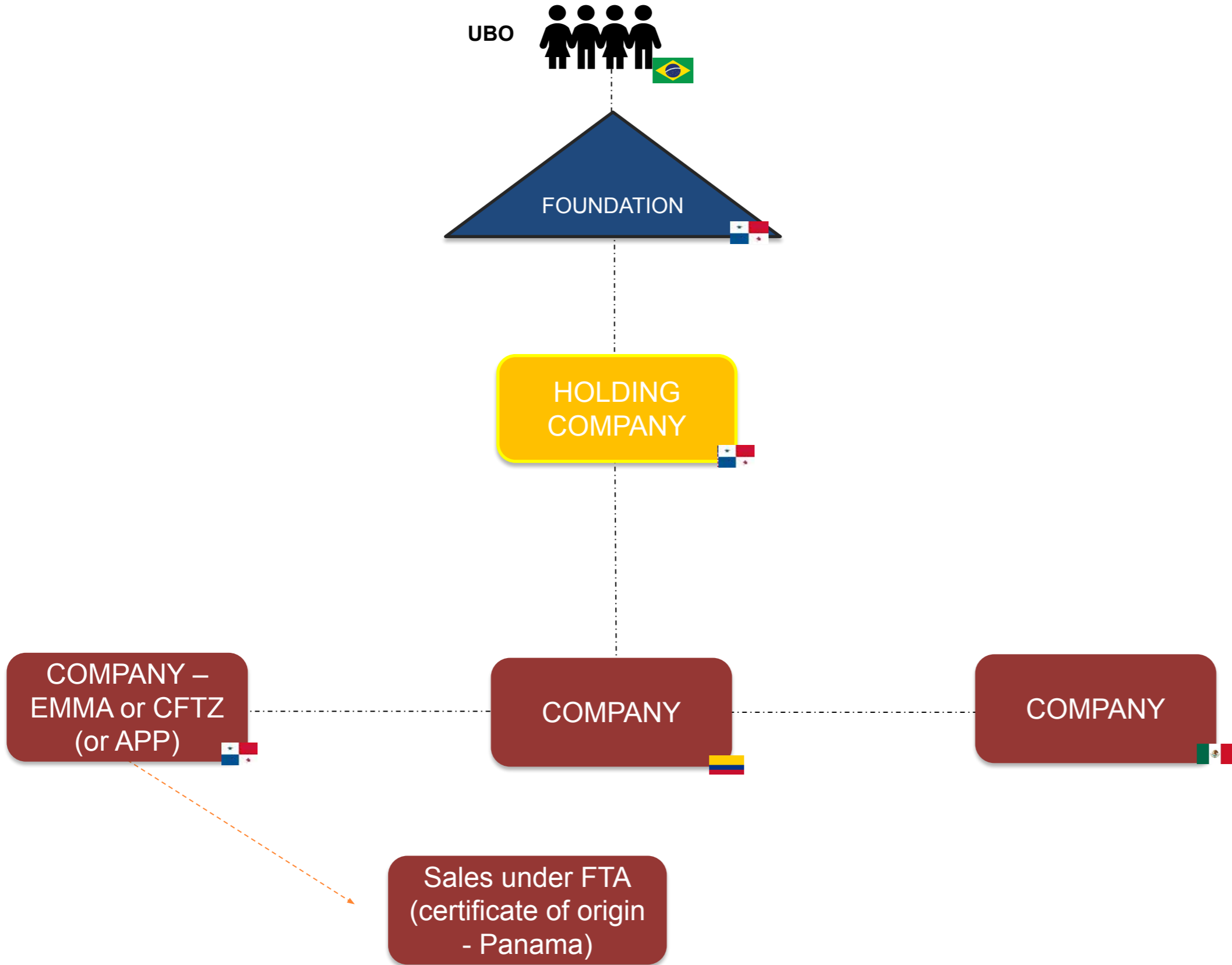
- **Creation of a structure for the consolidation of assets abroad**
A private interest foundation was structured as the owner of a Panamanian holding company.
- **Intragroup separation that allows the non-application of CFC**
The Panamanian holding company owns several companies located in different jurisdictions within the region.
- **Change of tax residence of the UBO of the foreign asset consolidation structure**
The structure's UBO transferred its tax residence from Brazil to Panama upon obtaining permanent residency, which limits its tax risks.

STRUCTURE OF INTEREST: RE-DOMICILING OF THE MANUFACTURING OPERATION

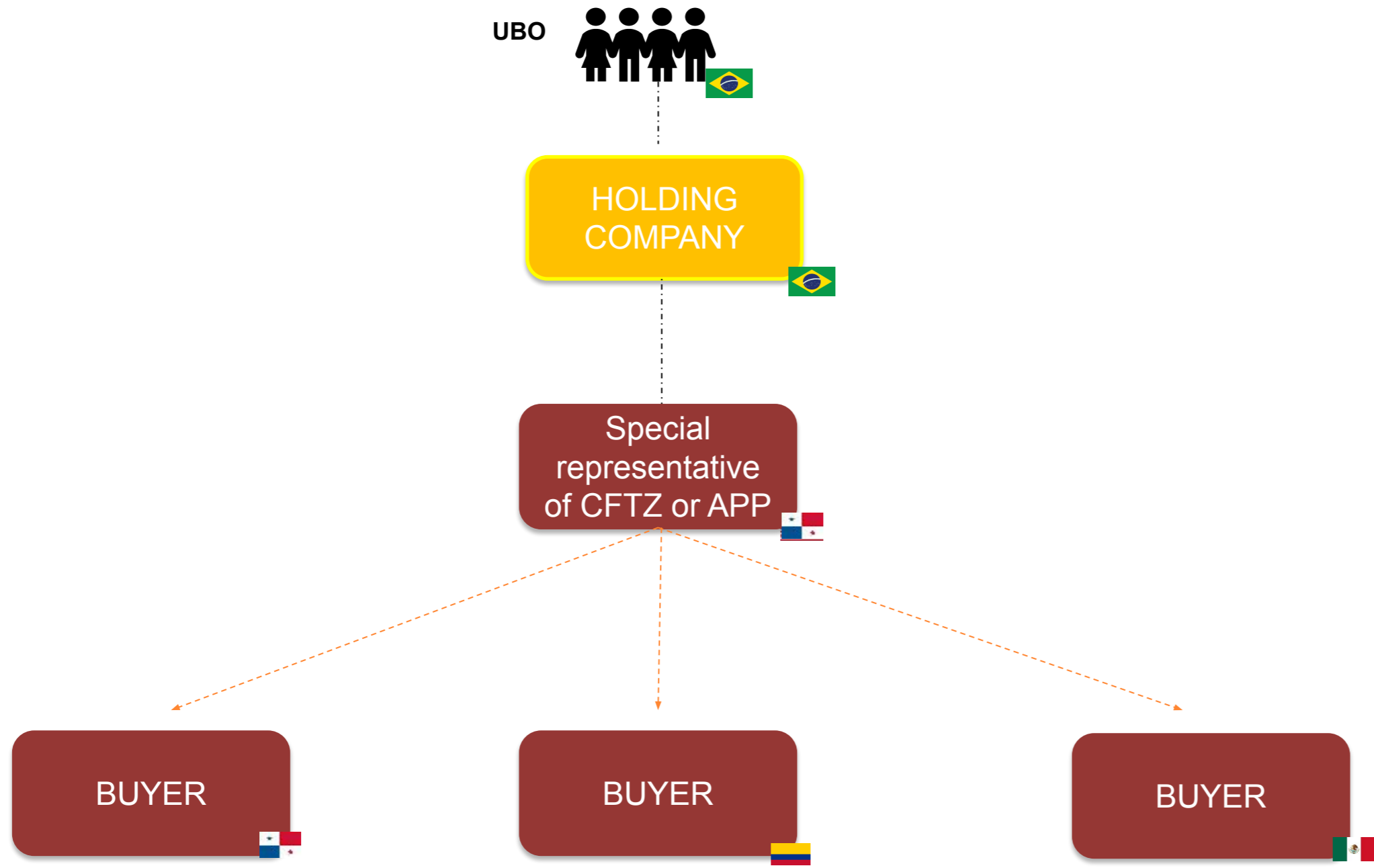
Operation

Redomicile of manufacturing operations

- **Creating an asset structure**
A private interest foundation was structured as the owner of a Panamanian holding company.
- **Business ownership in various jurisdictions**
The Panamanian holding company owns several companies located in different jurisdictions within the region.
- **Change of tax residence of the UBO**
The structure's UBO moved its tax residence from Brazil to Panama upon obtaining permanent residence .
- **Residency of the manufacturing operation**
The manufacturing operation is redomiciled in Panama and established under the EMMA, FTA (ZLC) (or PPP) regime, or both (depending on eligibility), which grants them access to a preferential tax regime. This allows them to obtain Panamanian certificates of origin and export under the Panama Free Trade Agreements, which represents a significant tariff benefit (compared to manufacturing in Brazil).



STRUCTURE OF INTEREST: AMERICAN REDISTRIBUTION CENTER



Operation

American Redistribution Center

- **Registration as a Special Representation Company in the ZLC or within the APP**
The company in Brazil is authorized to operate in the Colon Free Zone (without the need to establish a local entity), which allows it to maintain consolidated accounting and be exempt from taxes in Panama, or in the APP, taking advantage of its tax regime.
- **Logistical support**
The registry is covered by a service provider that offers all logistics facilities in a 3PL format: receiving, storing, and forwarding, allowing for low costs.
- **Access to competitive freight costs**
Panama's geographic location and the high volume of trade within the ZLC and the APP allow for more competitive freight costs for target markets.



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