

Júlia Filipe



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Noteworthy

Master Tax Consultants (since January 2013); KPMG, Senior Tax Manager (2000-2012); KPMG, Manager (1997-2000); PwC, Manager (1995-1997); Ernst & Young, Senior Consultant (1992-1995); Ernst & Young, Consultant (1991-1992); Portuguese Tax Authorities; Tax Inspector (1989-1991).

Professional experience

A representative sampling of my professional experience is as follows:

Tax review under M&A operations

- Successfully assisted a US multinational Company in reviewing the tax position of a target (internet services provider business in EMEA), identifying the main tax liabilities reflected in the accounts as well as the contingent or undisclosed tax liabilities;
- Successfully assisted a German investment Fund in reviewing the tax position of a target (real estate and hotel company), identifying the main tax liabilities reflected in the accounts as well as the contingent or undisclosed tax liabilities;
- The tax review comprises Corporate Income Tax, Withholding Tax, Transfer Pricing; VAT, Stamp Tax, Municipality Transfer Tax and the respective time-frames.

Tax planning under M&A operations

- Successfully assisted a German Fund to acquire a target company in Portugal - investment rounding € 60 million;
- Minimization of the need for contracting new loan agreements - leverage effect;
- Flexible financing and elimination of the inefficiencies resulting from the taxation of both credit operations – capital - and interest - either by withholding tax or its non deductibility;
- Successful definition of a structure for a Luxembourg entity investing in Portugal - investment rounding € 52 million;

- Flexible and tax-efficient repatriation of cash-flows to the ultimate investors, namely repatriation of loans or dividends;
- Objectives - maximize the corporate tax deduction for finance costs incurred; allow the group companies to provide security for borrowing; reduce Stamp Tax on the acquisition and financing and in the course of reorganization; reduce tax costs within the group; reduce withholding tax on interest; reduce tax on dividends; reduce the tax cost of sale or realization of investment; reduce the tax cost on a subsequent disinvestment; definition of the transfer pricing guide lines policy for the group.

Tax planning for internationalization

- Delimitation of the alternatives for the investment to be made by a Portuguese entity;
- Definition of the position of the Portuguese investing entity regarding the internal tax law;
- Definition of the position of the Portuguese investing entity regarding the Double Taxation Agreement;
- Repatriation of funds;
- Alternatives for the expatriate's tax packages.

Tax planning for disinvestment of a German investment Fund in Portugal

- Delimitation of the alternatives for a disinvestment to be made by a German management company on the benefit of a German investment fund in Portugal;
- Definition of the position of the German investment Fund regarding the Double Taxation Agreement.

Review of additional tax assessments for a local subsidiary of a German multinational company and definition of the possible defense scenarios

- Review on additional tax assessments on Corporate Income Tax issued by the Portuguese Tax Authorities respecting to a local subsidiary of a German company regarding intra-group charges (common costs; R & D charges; commissions; IT services);
- Review the Tax Inspection Conclusions Reports regarding the withholding tax obligation at the domestic 15 % rate, due on royalties and on payments of services made to non-resident entities;
- Recalling the existing Double Tax Treaties and the Tax Court decisions, I successful provided support to the client to defend its position, challenging the amount computed by the Portuguese Tax Authorities.
- The total amount assessed was reimbursed to the German Company by the Portuguese Tax Authorities, rounding € 2.6 million.

Assisting a local subsidiary of a French company to implement corrections to the tax procedures

- To assist the local subsidiary with the implementation of the necessary procedures for the correction of its position, as to what concerns to withholding taxes on Services, Royalties and Interest;
- At a second stage, to assist the local company in establishing the procedures to be take in future, on the proper enforcement of the relevant Double Tax Agreements rules, and the EU Directives, in what regards tax law;
- The success of the action allowed the company to save funds in a material amount – rounding 1.2 million.

Assisting MC' subsidiaries in Portugal to prepare Corporate Income Tax (CIT) Returns

- Work based on the analytical trial balances, as well as other information containing relevant details so as to permit the validation of the adjustments necessary for the assessment of the taxable income.
- Verify, on a test basis, and based on the information prepared, in order to assure the taxable income, taxable basis and, consequently, tax due, are being correctly assessed, taking into account the tax rules in force.
- Foster that no inconsistent information arises from the Corporate Income Tax Return.
- Suggest, if applicable, the preparation of additional and optional information, so as to better support certain positions taken, in order to support the minimization of information requests from the tax authorities.

Assisting MC' subsidiaries in Portugal to prepare Simplified Corporate Information and the "Tax File"

- Review the report of the intra-group transactions from a transfer pricing perspective.
- Review the annual VAT report.
- Review of the statistical report.

Markets' experience

<ul style="list-style-type: none">• Automotive• Capital Markets• Chemicals and Performance Technology• Construction• Diversified Industrials• Energy and Natural Resources• Food, Drink and Consumer Goods• Government and Public Sector• Healthcare	<ul style="list-style-type: none">• Investment Management• Insurance• Media• Pharmaceuticals• Private Equity• Retail• Technology• Telecommunications• Transport
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Education

- Universidade Nova de Lisboa
- MBA (five years), 1989
- Major: Public Economics and Accounting
- Ordem dos Revisores Oficiais de Contas – Certified Auditors’ Association
- Preparation Course to Certified Auditor (2009-2010)
- Examinations in course
- Portuguese Tax Authorities
- Post –graduated preparation for Tax Inspectors (September – December 1988)

Professional Associations

- Associação Portuguesa de Economistas
- Associação Portuguesa de Consultores Fiscais

Interests and hobbies

- Reconstruction of hold houses and apartments
- Gardening
- Vintage furniture – hand made