

(p. 2 Of Normative Instruction RFB no. 1846, of December 28th 2018)

b) Foreign countries involved: _____

c) Foreign taxes involved:

Fiscal Year/Period	Maturity	Amount	Tax

d) Description of actions taken and taxation that are not in accordance with the international agreement or convention:

e) Number of the refund application process, if previously submitted: _____

f) Provisions of Brazilian/foreign tax legislation that have led or may lead to taxation that is not in accordance with the DTA:

g) Please, indicate the DTA and the legal provisions deemed to be infringed:

h) Please, indicate the nonresident related persons involved:

i) Have you submitted the same issue to the tax administration of the other Contracting State? (including whether you have applied for a refund abroad) (please, specify)

j) Does the issue involve any matter that has been assessed by the tax administration of the other Contracting State, including advance pricing arrangement (APA), tax consultation proceeding, specific interpretation by the foreign tax administration, ruling, or similar procedures? (please, specify)

k) Has this matter been submitted to judicial or administrative review in Brazil?

Yes, judicial. Please, identify the proceeding: _____

Yes, administrative. Please, identify the proceeding: _____

No.

l) Has this matter been submitted to judicial or administrative review abroad?

Yes, judicial. Please, identify the proceeding: _____

Yes, administrative. Please, identify the proceeding: _____

No.

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The taxpayer confirms the accuracy and completeness of the information presented and the documentation provided, as well as the commitment to send to the Brazilian competent authority, in a timely manner, documents proving any changes in the information presented or new information, including new decisions rendered in administrative or judicial proceedings about the matter or issued by the competent authority of the other Contracting State.

He or she further declares that he or she is aware that the implementation of a possible solution will be conditioned to the explicit acceptance of the solution by the applicant and the related persons resident abroad involved in the solution, by means of the form in Annex IV of the Normative Instruction RFB N. 1,846, of December 28, 2018.

Place and date

Signature Taxpayer/Legal Representative/Attorney-in-fact

Phone number: _____

Protocol