KINSTELLAR

Your Tax Dispute Resolution Advisor: an integrated tax and legal approach

Introductory note

We are pleased to share with you a brochure which highlights Kinstellar's local capabilities in guiding clients through every stage of a tax dispute from first contact to the court of law. Few law firms in Romania can offer fully integrated support, combining the know-how of specialised tax advisors and seasoned litigators. At Kinstellar, we bring these disciplines together into a single, seamless service line.

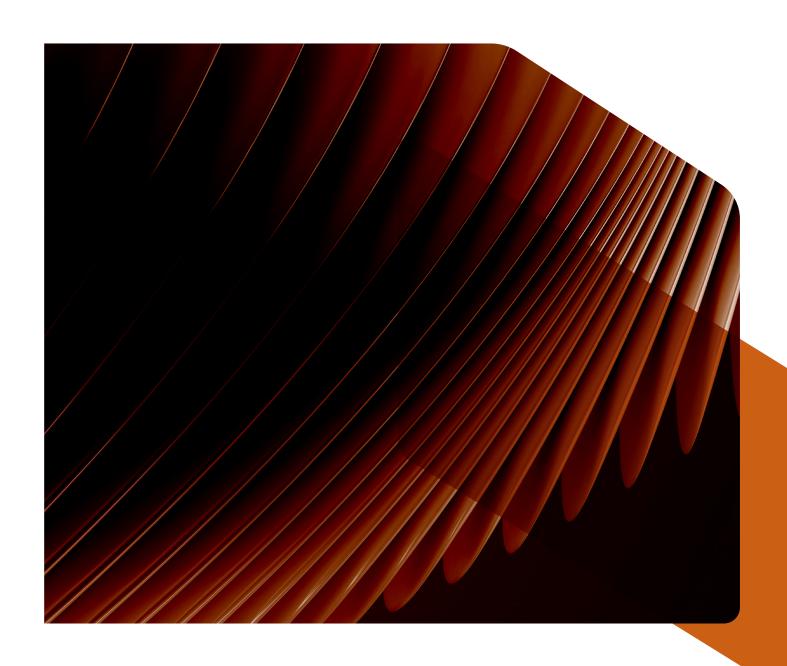
Integration is critical. By ensuring direct communication between our tax and dispute resolution experts, we can anticipate risks, secure the necessary documentation without delay, and prepare a robust strategy well in advance. This proactive cooperation translates into better protection of taxpayer rights and stronger advocacy throughout the entire process.

Our brochure sets out the three stages of support we provide – from audit simulations and representation during the audit itself, to the full resolution of tax disputes. We also introduce you to the local Kinstellar dedicated tax and legal team, combining in-depth knowledge of domestic practice with international-level expertise.

We invite you to explore the following pages as a concise overview of how our integrated approach delivers exceptional outcomes during tax audits and litigation.

Our integrated assistance is structured across three distinct phases:

- Tax Audit Simulation
- Legal and Tax Representation
- Tax Dispute Resolution



O1. Tax Audit Simulation

The purpose of the simulation is to identify potential risks in your company's operations and propose measures to mitigate them. The review will be conducted through sampling and will cover all areas of taxation.

Our assistance includes:

- Review of business areas to better understand your economic activities:
- Brief review of existing documents;
- Delivery of a written opinion detailing our findings and recommendations, including remedial actions where appropriate;
- Training sessions on procedural aspects related to tax audits and disputes.

Representation during the Audit

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If your company has already passed first contact, we can intervene to ensure a smooth and compliant process by managing communications with the

tax audit team.

Often, the outcome of a tax audit depends significantly on the quality of interaction with the tax officers.

Our tax and legal support includes:

- Mediating discussions with the tax officers to ensure appropriate information disclosure;
- Vetting and reviewing all correspondence with the tax audit team;
- Ensuring full compliance with procedural rules and safeguarding your taxpayer rights throughout the audit process.



O3. Tax Dispute Resolution

If a tax assessment decision has already been issued and you believe the assessment is overstated, we can assist you with the appeal against the decision, at all procedural stages.

Our services include:

- Reviewing all documents contained in the tax file;
- Preparing a robust litigation strategy on the merits of your case;
- Advising on and assisting with (i) the settlement of the tax assessment or (ii) measures to suspend the enforcement of the decision:
- Advising on available tax relief options (e.g., tax amnesty programs, deferred payment plans);
- Assisting with the suspension of enforcement measures initiated by tax authorities (e.g., garnishments, asset seizures).

Your benefits



Have access to a multidisciplinary team of tax advisors, lawyers, and accountants to assist you through any tax litigation process.



Gain a timely and comprehensive overview of your company's tax vulnerabilities;



Address risks proactively before a potential tax audit begins;



Ensure that in the event of a tax audit:

- You are well-prepared to respond to tax officers' inquiries;
- You benefit from professional representation;
- · Your taxpayer rights are fully protected;



Meet our Tax Litigation team

Our multidisciplinary team is ready to assist you with in-depth expertise in tax advisory, legal representation, and accounting matters.

You will benefit from the direct support of the following professionals:

Tax Team



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Dispute Resolution Team



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Exceptional, together.

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