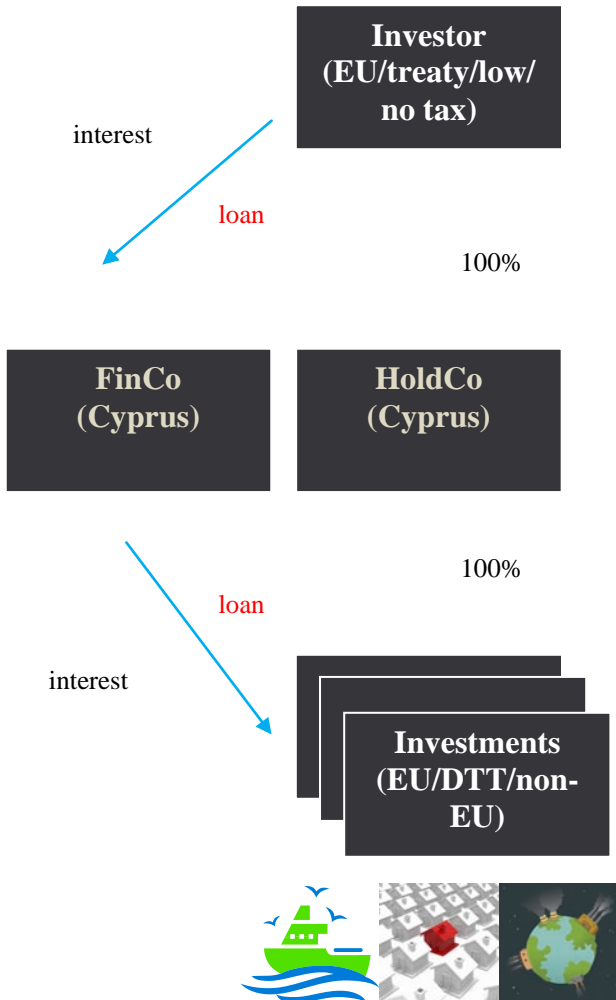


# FINANCING COMPANY STRUCTURE

## Financing Company planning - basic



- Taxation on set up:
  - ✓ No or minimal transaction tax
- Taxation on income and gains:
  - ✓ 12.5% tax on interest income
  - ✓ Interest expense tax deductible (at arm's length margin)
  - ✓ No thin capitalization rules or debt/equity ratio
  - ✓ FX results (if at all) subject to 12.5% tax
  - ✓ No withholding tax on interest payments
- Repatriation / exit:
  - ✓ In the form of interest and repayment of principal amount of loan: no tax
  - ✓ No tax on gains from sale of shares by investor