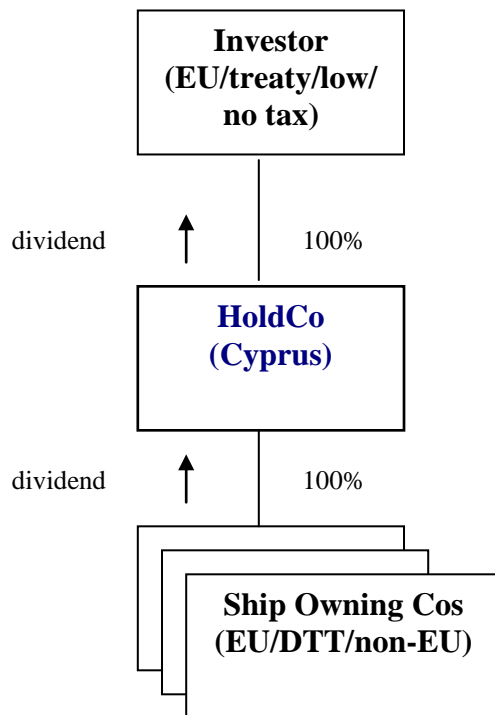


TAX PLANNING SCENARIOS – SHIPPING COMPANIES

- **Holding Company Structure**
- **Financing Company Structure**
- **Ship Management Third Parties**
- **Ship Management within a Group**

Shipping companies: Holding Company planning - basic

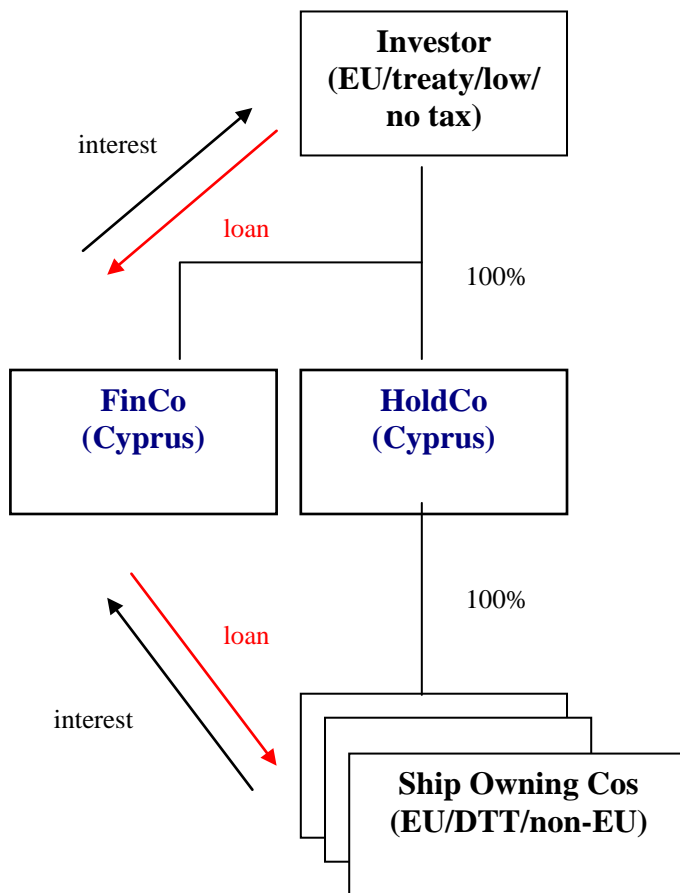


- Taxation on set up:
 - ✓ No or minimal transaction tax
- Taxation on income and gains:
 - ✓ No/reduced taxation on dividend income
 - ✓ No taxation on sales of share investments
 - ✓ No withholding tax on dividend distributions
- Exit taxation:
 - ✓ No taxation on gains from sale of HoldCo shares
 - ✓ Transfer of corporate legal seat possible under circumstances
 - ✓ No other exit taxation



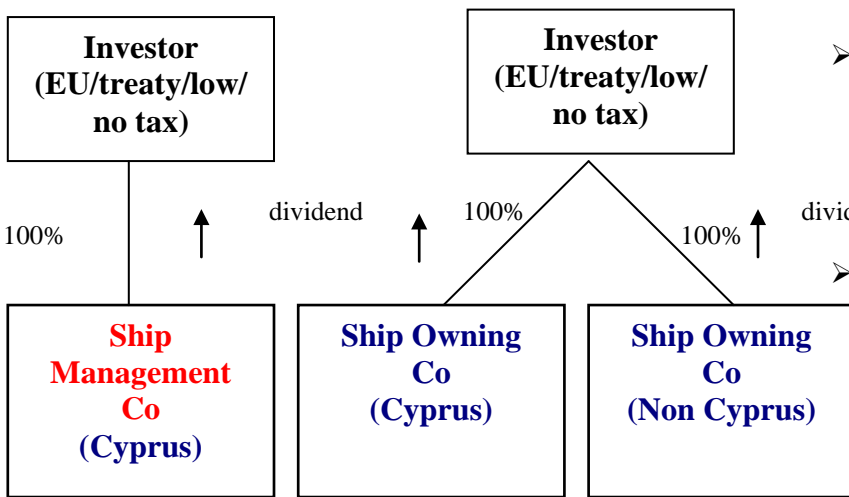
Financing Company Structure

Shipping companies: Financing Company planning - basic



- Taxation on set up:
 - ✓ No or minimal transaction tax
- Taxation on income and gains:
 - ✓ 10% 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 10% 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

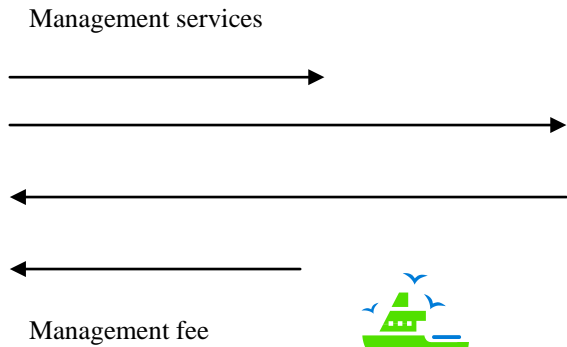
Ship management structuring - third parties: basic



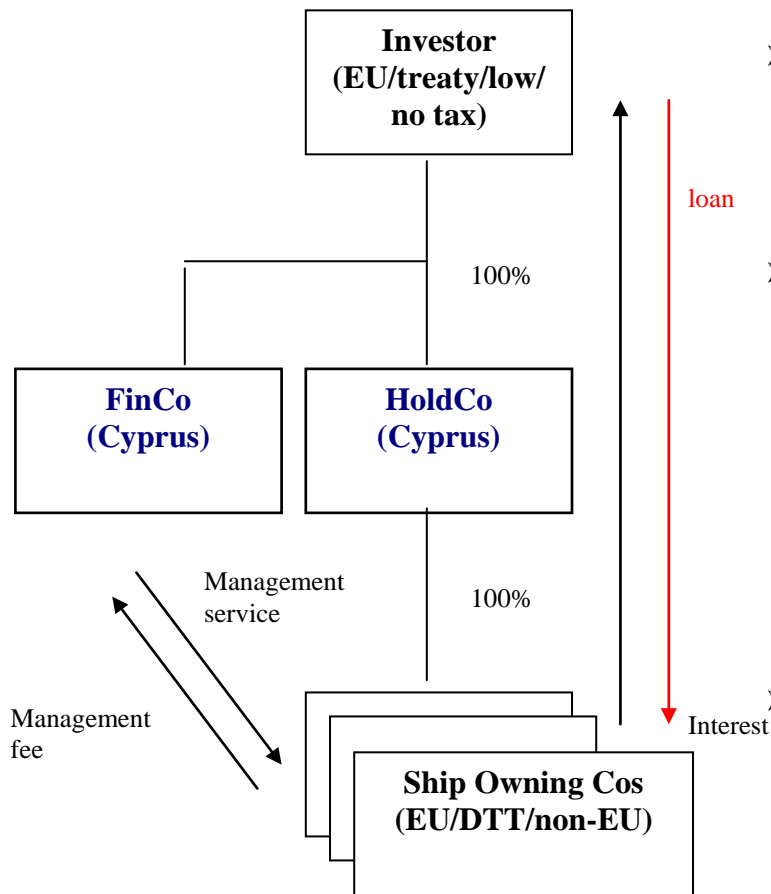
- Taxation on set up:
 - ✓ No or minimal transaction tax

- Taxation on income and gains:
 - ✓ No/reduced taxation on dividend income
 - ✓ No taxation on sales of share investments
 - ✓ No withholding tax on dividend distributions

- Exit taxation:
 - ✓ No taxation on gains from sale of HoldCo, Ship Management Co and Ship Owing Cos shares
 - ✓ Transfer of corporate legal seat possible under circumstances
 - ✓ No other exit taxation



Ship owning & ship management structuring - within group: basic



- Taxation on set up:
 - ✓ No or minimal transaction tax
- Taxation on income and gains:
 - ✓ 10% 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 10% 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

