

# *The Comtax<sup>®</sup> System*

VERSION 11

*The unique tax planning system for cross-border repatriations*



# *Optimal solutions conveniently*

*Throughout the decades, Comtax® users have discovered how the System can help create effective cost control. Clients include multinational companies, lawyers, tax consultants and leading banks worldwide.*



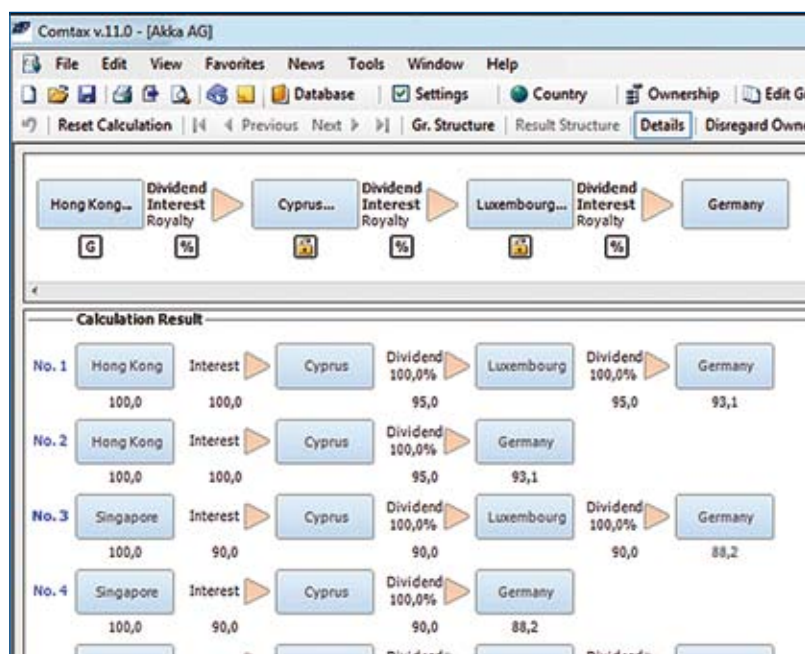
# at hand – saves tax and time!

You should not have to spend days finding up-to-date regulations and thereafter make numerous calculations for cross-border transactions. The Comtax® System does the job for you!

With Comtax® you can concentrate your efforts on

evaluating optimal solutions against factors such as exchange regulations and group policies.

In this brochure there is only space to demonstrate a limited number of the opportunities the Comtax® System offers.



Comtax® calculates the tax effects on cross-border transactions of:

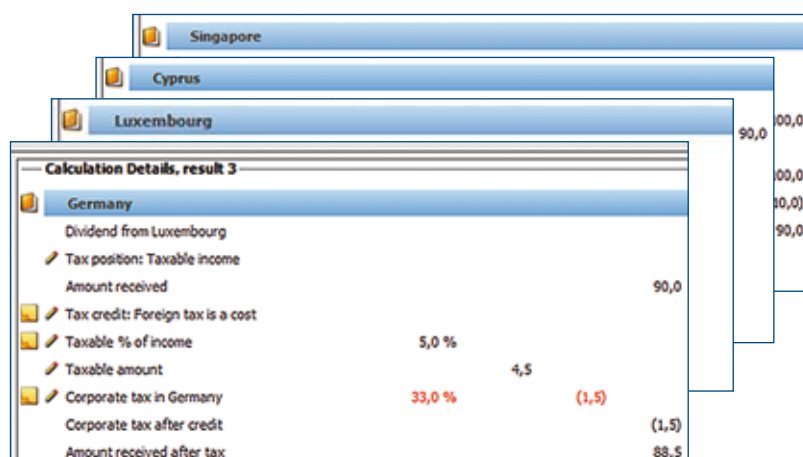
- Dividends.
- Two types of interest – intercompany interest and interest paid to financial institutions.
- Three types of royalties – patent, copyright and trademark.
- Capital gains on sale of shares.

In addition to this you have the possibility to apply UK onshore pooling to your dividends and thin capitalisation rules to your interest transactions.

The number of available tax jurisdictions in the Comtax® System is regularly increased based on suggestions from users.

The 30 best results are neatly presented within a few seconds. All results are:

- Fully transparent from the start figure down to what is eventually received after tax in the hands of the ultimate recipient.
- Supported by comprehensive explanations.
- Swiftly exported to Microsoft® Excel, Microsoft® Word or as an Adobe® pdf file to be used in reports.
- Easily modified with your specific rate, e.g. state tax in the USA, municipal trade tax in Germany, and clearly indicated in red.
- Easily shared with the people involved.



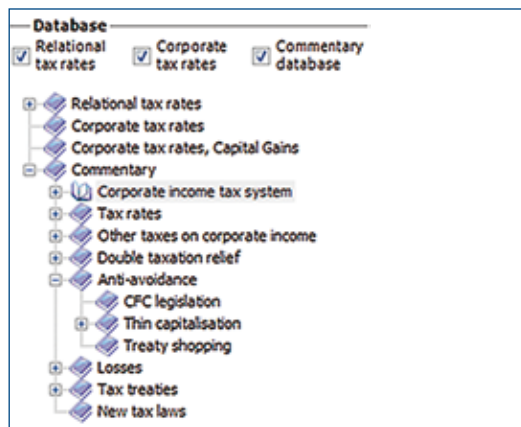
# *A comprehensive database – updated monthly!*

The user friendly database, which is updated monthly, contains effective tax rates, income situations and international relations. Any rate in the database is fully modifiable by the user. The database is divided into three parts:

The *relational tax rates database* forms the basis for dividend, interest and royalty payments and shows rates and rules applicable between each country.

The *corporate tax rate database* contains statutory corporate tax rates, surtaxes and progressive income scales. Together these rates generate the effective corporate tax rate.

You will find detailed information about each country in the *commentary database*. The information presented, e.g. group taxation, anti avoidance rules, elimination of double taxation, a complete list of signed and double tax treaties in effect, is of importance when analysing possible scenarios and generating memos.



In connection with the monthly update of the Comtax® System, a newsletter is published and distributed to the users.

The Comtax® System also contains a library covering newsletters from 2002 and onwards.

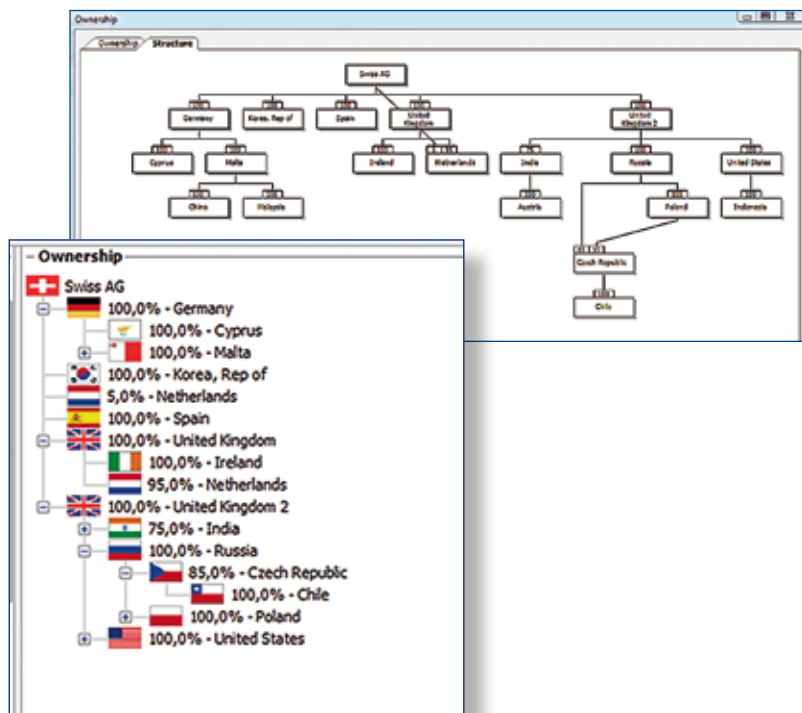


# The uniqueness of the Comtax® System is reached...

...when you apply your own facts and figures, such as:

- Inserting the real start value in a transaction.
- Starting the calculation before or after corporate tax in the source state.
- Changing the tax positions to a situation with current loss, loss carried forward or taxable income etc.
- Inserting payment restrictions to avoid results not in line with group policies.
- Selecting your countries.
- Having the Comtax® System analysing the situation with or without your group structure as a basis.
- Copying and renaming countries.
- Using your own preferred groups of countries or the predefined groups for the OECD and the EU.

Country	Start Value
Cyprus	100
Czech Republic	3500
Denmark	4000
Ecuador	100
Egypt	100
El Salvador	100
Estonia	100
Finland	100
France	100
Gabon	100
Germany	100
Gibraltar Exempt C.	100
Gibraltar	100
Greece	100
Guatemala	100
Hong Kong	100
Hungary	100
Iceland	100
India	100
Indonesia	100



Your group ownership structure can easily be set up in Comtax® and can easily be modified for specific purposes. The structure instructs the calculation process and a consolidated group result can be generated.

Having the structure as a basis will lead to efficient and useful results, for instance when implementing a new entity to the group.

All changes made by you are retained within the project and can be used over and over again. Further, all changes are neatly summarised for easy access.



# *Comtax<sup>®</sup> at a glance*

The Comtax<sup>®</sup> System has been designed to allow the international tax professional to identify the optimal solution in the shortest possible time.

When used as intended, it guarantees that a global group pays a minimum of taxes on cross-border payments.

The Comtax<sup>®</sup> System:

- Will within seconds present you with ideas of optimal ownership structures.
- Will quickly analyse 'what-if' scenarios and identify the optimal cross-border tax planning strategy.
- Improves your net revenue by reducing your total tax burden.
- Tells you to whom you should license an intangible right and when a sublicense arrangement will improve your after-tax result.
- Lets you know whether to finance a subsidiary with a loan or equity and how to route the money in the most tax-efficient way.
- Tells you how to set up financial companies and how to structure the loans.
- Always tells you the effects on after-tax result.
- Lets you know the capital gains tax effect when you sell the shares of a subsidiary.
- Presents you with the figures, comments and explanations necessary to show those not involved in strategic tax planning the advantages of a certain structure.
- Gives you the arguments why tax costs are as important as other costs.
- Has a monthly updated database containing tax information on more than 125 countries.



# *More than two decades at the forefront of international tax planning*



## *Extensive support*

Comtax® is organised from the inside out in order to ensure that our customers know how to utilise all the benefits of the Comtax® software.

Training can be provided either on site or via Comtax® online training, where the training session is brought directly to your desktop via the Internet.

Our skilled trainers can tailor the session to your specific needs and thereafter interact with you to ensure that you optimise your use of the Comtax® software for your situation.

Furthermore, we offer seminars around the world, where Comtax® users meet, exchange experiences, develop their Comtax® software skills and gain knowledge of the very latest developments.

We also have experienced in-house technical support staff who promptly assist you on any technical issue.

## *Continuously refined*

Comtax® is the only company worldwide to offer a tax planning software suite specially tailored for international tax professionals.

The Systems are continuously being refined, and have been used on a daily basis since 1985 by multinational corporations, banks, tax consultants and lawyers all over the world – providing them with the tools for minimising tax on cross-border repatriations and capital gains on shares.

Do not hesitate to call us today for a free full-scale demonstration, tailored to your specific situation and needs.



## COMTAX

*The problem is complex – the solution is simple*

Comtax AB, Järnvägsgatan 11, SE-252 24 Helsingborg, Sweden.

Tel. +46 42 38 04 20. Fax +46 42 21 01 84.

E-mail: [info@comtaxit.com](mailto:info@comtaxit.com) Web: [www.comtaxit.com](http://www.comtaxit.com)