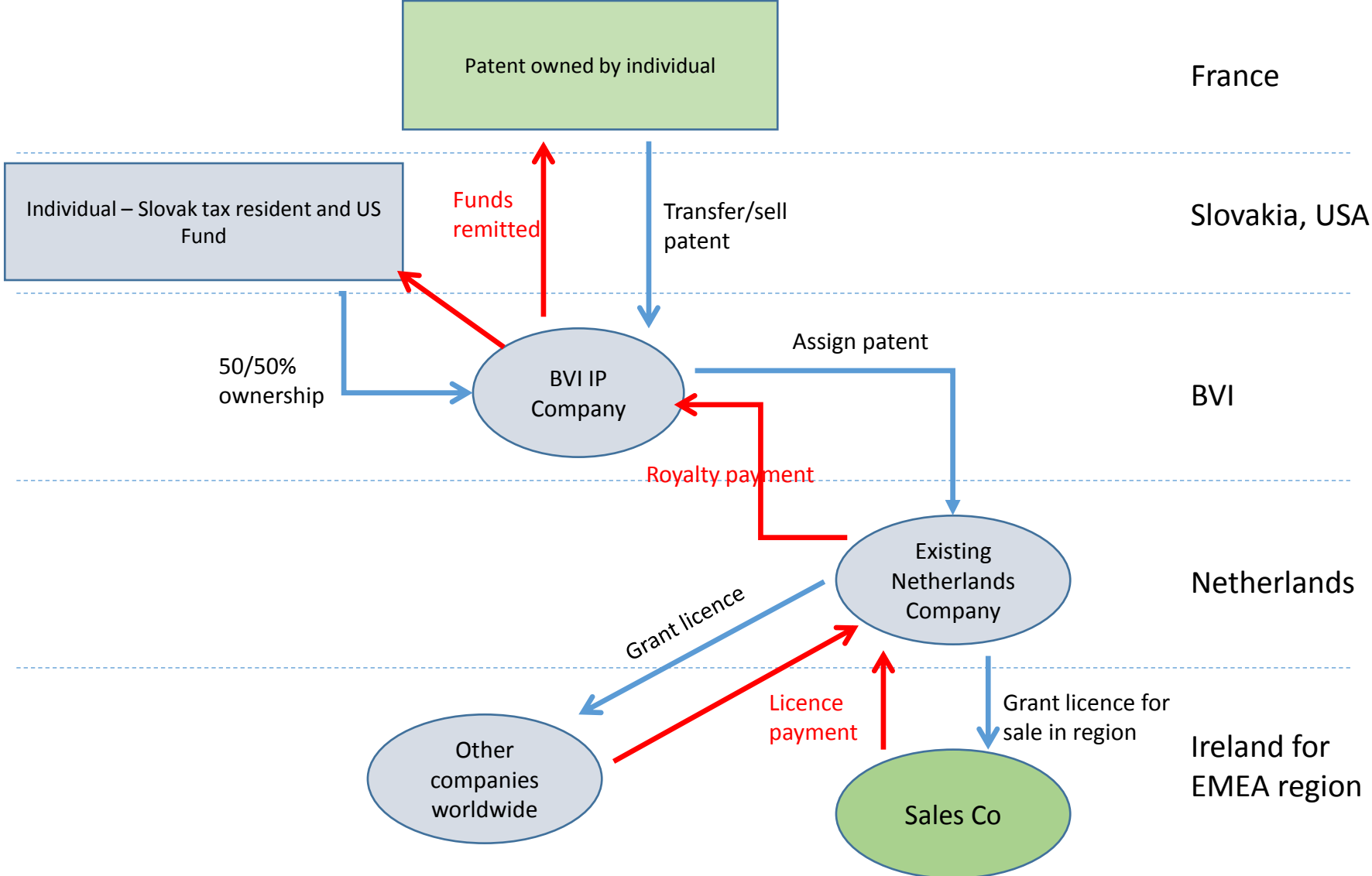
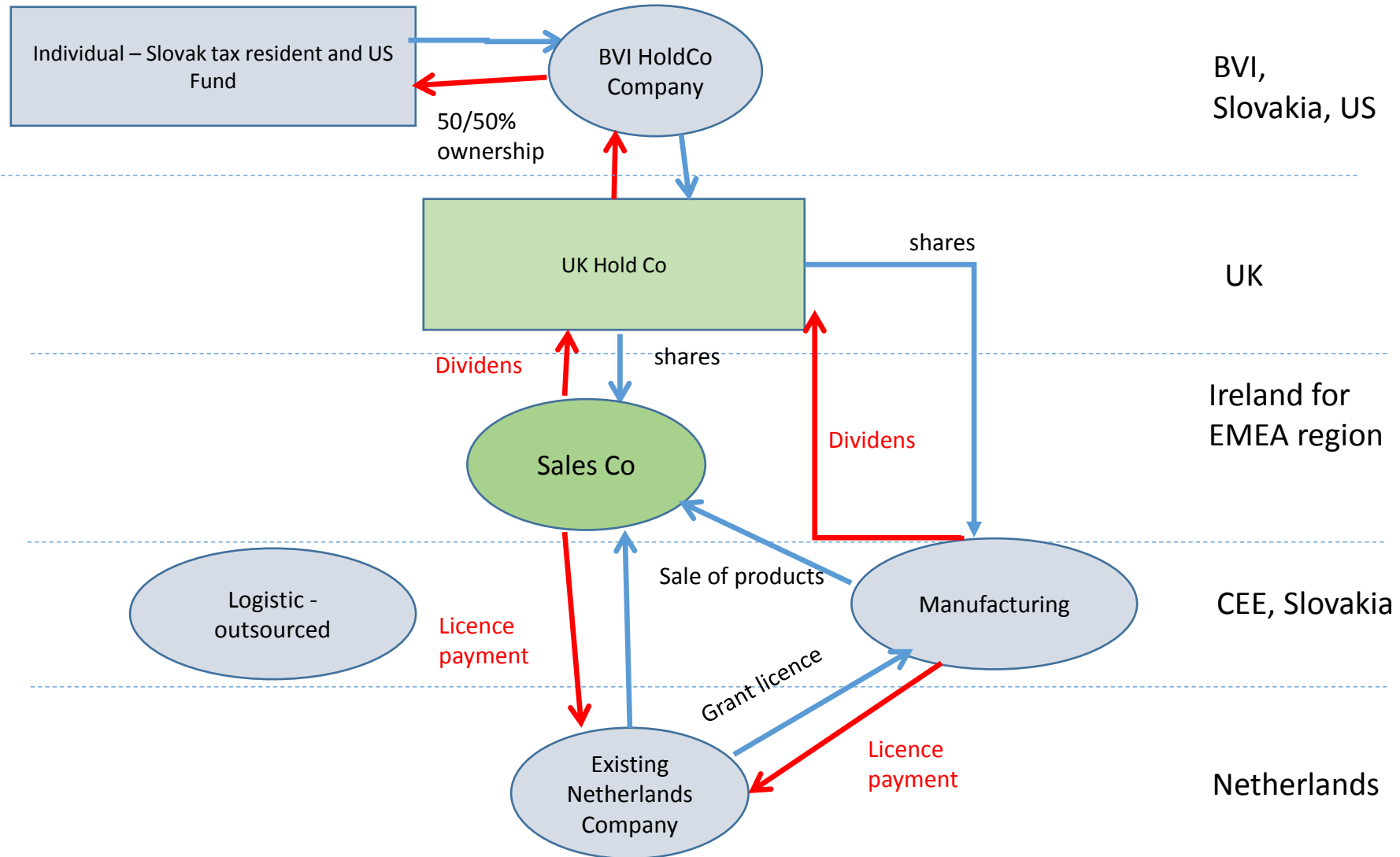


IP rights structure



Holding company structure



Sales by SalesCo	100,00
less IP fees	50,00
less manufact costs	22,00
Profit before tax	28,00
Tax at 12.5%	3,50
Profit after tax	24,50
ManCost	20,00
plus IP fees	2,00
Total ManCost	22,00
Fees rec by IP DutchCo for Sales	50,00
Fees rec by IP DutchCo for Manu	2,00
IP licence fee at 4%	2,08
No tax	0,00
License fee to BVI	49,92
WHT	0,00
Income sumary	
Income from licence fees	49,92
Dividends from SalesCo	24,50
Total distrubution	74,42
Total Tax	
SalesCo	3,50
IP fees	2,08
Total Tax	5,58

.....and the winner is...the „blues“

Total Sales	100
Manu cost 3rd party	20
Tax costs	5,58
Total profit	74,42