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Holding Companies - 2005

A European Comparison

Country	Austria	Belgium	Cyprus	Czech Republic	France	Germany
Information up-to-date as at:	Jan. 1, 2005	Jan. 17, 2005	Jan. 1, 2005	Jan. 1, 2005	Jan. 1, 2005	Jan. 1, 2005
Tax declaration deadline	September	September	December	March	April	May ¹⁾
Standard Corporate Tax Rate	25.00 %	33.99 %	10.00 %	28.00 %	33.83 %	26.37 %
Pre Tax Cash Available to Parent	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000
Withholding Tax on Interest Paid	€0	€37.500	€0	€0	€0	€0
Withholding Tax on Dividend Paid	€525.625	€305.159	€0	€301.500	€259.740	€516.332
Corporate Tax	€187.500	€255.605	€100.000	€280.000	€558.401	€224.672
Net Cash received by Parent Company	€1.826.875	€1.941.736	€2.440.000	€1.958.500	€1.721.859	€1.798.996
Profit Before Interest and Tax	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Withholding Tax on Interest Paid	0.00 %	1.48 %	0.00 %	0.00 %	0.00 %	0.00 %
Withholding Tax on Dividend Paid	20.69 %	12.01 %	0.00 %	11.87 %	10.23 %	20.33 %
Corporate Tax	7.38 %	10.06 %	3.94 %	11.02 %	21.98 %	8.85 %
Net Cash received by Parent Company	71.92 %	76.45 %	96.06 %	77.11 %	67.79 %	70.83 %
Dividends Exemption						
Percentage Exempt	100.00 %	95.00 %	100.00 %	0.00 %	95.00 %	95.00 %
Minimum Holding	10.00 %	10.00 %	1.00 %	0.00 %	5.00 %	0.00 %
Minimum Holding Period (months)	12.00 %	12.00 %	0.00 %	0.00 %	0.00 %	0.00 %
Capital Gains Exemption						
Percentage Exempt	100.00 %	100.00 %	100.00 %	0.00 %	55.00 %	95.00 %
Minimum Holding	10.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %
Minimum Holding Period (months)	12.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %
Other Conditions						
Maximum Passive Income Allowed	50.00 %	100.00 %	100.00 %	0.00 %	0.00 %	100.00 %

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Holding Companies - 2005

A European Comparison

Country	Austria	Belgium	Cyprus	Czech Republic	France	Germany
Subject to Tax (minimum rate)	15.00 %	15.00 % ²⁾	5.00 %	0.00 %	0.00 %	5.00 %
Trading Activities Allowed	Y	Y	Y	Y	Y	Y
Interest Expense Deduction						
Debt Equity Ratio	N	No ³⁾	N/A	4:01:00	N	1,5:1
Related Interest Expense Allowed	Y	Y	N	Y	Y	Y
Withholding Tax on Interest Paid	0.00 %	15.00 %	0.00 %	15.00 %	0.00 %	0.00 %
Other Deductions						
Investment Cost write-down	Y	¹⁾ N	N	N	N	Y
Goodwill write-off	N	²⁾ N	N	Y	Y	Y
Participation Exemption applies to:						
Partnerships	Y	N	N	N	Y	N
Permanent Establishment Of EU Company	Y	Y	Y	N	Y	Y
Permanent Establishment Of Treaty Company	N	Y	Y	N	Y	Y
Branch of Foreign Company	Y	Y	Y	N	Y	Y
Resident Company	Y	³⁾ Y	Y	N	Y	Y
Company Legal Form	GmbH	SPRL	Ltd	sro	SARL	GmbH
Minimum Capital (Euros)	€35.000	€18.500	€1	€6.000	€7.500	€25.000
Time to Form (weeks)	1	0	1	12	3	4
Shareholders	Y	Y	Y	Y	Y	Y
Minimum Number	1	1	1	1	2	1
Nationality	ANY	ANY	ANY	ANY	ANY	ANY
Corporate or Individual	BOTH	BOTH	BOTH	BOTH	BOTH	BOTH
Directors	Y	Y	Y	Y	Y	Y
Minimum Number	1	1	1	1	1	1
Nationality	ANY	ANY	ANY	ANY	ANY	ANY
Corporate/Individual	INDIVIDUAL	BOTH	BOTH	INDIVIDUAL	INDIVIDUAL	BOTH ¹⁾

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Holding Companies - 2005

A European Comparison

Country	Austria	Belgium	Cyprus	Czech Republic	France	Germany
Company Legal Form	AG	SA	Ltd		SA	AG
Min Capital (Euros)	€70.000	€61.500	€1	€0	€37.000	€50.000
Time to Form (weeks)	2	0	1	0	3	8
Shareholders	Y	Y	Y		Y	Y
Minimum Number	1	2	1	0	7	1
Nationality	ANY	ANY	any		ANY	ANY
Corporate or Individual	BOTH	BOTH			BOTH	BOTH
Directors	Y	Y			Y	Y
Minimum Number	1	2	0	0	3	1
Nationality	ANY	ANY	ANY		ANY	ANY
Corporate/Individual	INDIVIDUAL	BOTH	BOTH		BOTH	INDIVIDUAL ²⁾
Capital Tax						
Capital Contribution Tax	1.00 %	0.50 %	0.00 %	0.00 %	0.00 % ³⁾	0.00 %
Exemptions possible	N	Y	N	N	Y	N
Withholding Tax :						
Number of Tax Treaties	60+	87	40	100+	100	88
Offshore Parent Company	25.00 %	15.00 %	0.00 %	25.00 %	25.00 %	25.00 %
Treaty Co Parent (maximum)	10.00 %	15.00 %	0.00 %	15.00 %	15.00 %	15.00 %
Non-Resident Individual	25.00 %	25.00 % ⁴⁾	0.00 %	25.00 %	25.00 %	25.00 %
Resident Individual	25.00 %	25.00 % ⁵⁾	15.00 %	25.00 %	0.00 %	25.00 %
Income Tax Exemption for Resident Individual	100.00 %	100.00 %	100.00 %	0.00 %	50.00 %	0.00 %
Parent Subsidiary Directive						
Withholding Tax	0.00 %	0.00 %	0.00 %	15.00 %	0.00 %	0.00 %
Minimum Holding	25.00 % ⁴⁾	25.00 %	0.00 %	25.00 %	20.00 %	25.00 %
Minimum Period (Months)	12 ⁵⁾	12	0	0	24	12
Disclosure						
Disclosure of Beneficial Owner	Y ⁶⁾	N	N	Y	Y ⁴⁾	Y ³⁾
Banking Secrecy	Y ⁷⁾	Y	Y	Y	Y ⁵⁾	Y ⁴⁾

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Holding Companies - 2005

A European Comparison

Country	Austria	Belgium	Cyprus	Czech Republic	France	Germany
File Statutes	Y	Y	Y	Y	Y	Y
File Accounts	Y	Y	Y	Y	Y	Y ⁷⁾ ⁵⁾

Notes:

Austria:

- Over 7 years (investments in domestic companies); optionally for investments in non-domestic companies if capital gains and dividends are treated as taxable income.
- optionally for investment in non-domestic companies if capital gains and dividends are treated as taxable income.
- If the branch is subject to unlimited taxation in Austria.
- 10% minimum holding in the case of reciprocity
- 25% or 10% in case of reciprocity.
- Disclosure only to tax authorities required.
- To the tax authorities.

Belgium:

- 10% or 1,200,000.
- More than 15%, except for the EU companies (i.e. 12.5% Irish tax is ok).
- Ratio applicable to borrowings from tax exempt companies only (7 to 1).
- 25% or 15%.
- 25% or 15%.

France:

- 15th May in case of declaration by internet
- Capital gain is taxable at a special rate of 19%.
- However, a fixed tax of 230 is due.
- To the tax authorities.
- To the tax authorities.
- To the commercial court.
- To the commercial court.

Germany:

- Any with residence permit.
- Any with residence permit.
- To the tax authorities.
- Depends on the size criteria.
- Depends on the size criteria.

Gibraltar:

- If the company is resident owned and controlled, incorporated in Gibraltar or if the company is exempted, then the annual tax is GBP 225.

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- Ireland:**
- 1) Interest paid to a non-resident parent shall be treated as a distribution in certain cases. Please see the commentary on dividend withholding tax.
 - 2) The EU parent subsidiary directive is applied. It provides exemption from tax in the parent company's country of residence, or for a credit for foreign tax against Irish tax on any distributions received from residents of other Member States. 5% share
 - 3) Holding company legislation provides for an exemption from capital gains tax on the disposal of shares in a subsidiary resident in the EU or a treaty State. There is a minimum holding requirement of 5% and the shares must be held for 12 months.
 - 4) The subsidiary, or the group as a whole, must be wholly or mainly trading.

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Holding Companies - 2005

A European Comparison

Country	Gibraltar	Greece	Ireland	Italy	Luxembourg	Malta
Information up-to-date as at:	Jan. 1, 2005	Jan. 1, 2005	Jan 1, 2005	Jan. 1, 2005	Jan. 1, 2005	Jan. 1, 2005
Tax declaration deadline	June	May	September	October	May	September ¹⁾
Standard Corporate Tax Rate	0.00 % ¹⁾	32.00 %	12.50 %	33.00 %	30.38 %	35.00 % ²⁾
Pre Tax Cash Available to Parent	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000
Withholding Tax on Interest Paid	€0	€50.000	€50.000 ¹⁾	€31.250	€0	€0
Withholding Tax on Dividend Paid	€0	€0	€435.250	€551.972	€411.922	€0
Corporate Tax	€0	€880.000	€113.750	€245.660	€230.388	-€6.000
Net Cash received by Parent Company	€2.540.000	€1.610.000	€1.941.000	€1.711.118	€1.897.690	€2.546.000
Profit Before Interest and Tax	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Withholding Tax on Interest Paid	0.00 %	1.97 %	1.97 %	1.23 %	0.00 %	0.00 %
Withholding Tax on Dividend Paid	0.00 %	0.00 %	17.14 %	21.73 %	16.22 %	0.00 %
Corporate Tax	0.00 %	34.65 %	4.48 %	9.67 %	9.07 %	-0.0-24 %
Net Cash received by Parent Company	100.00 %	63.39 %	76.42 %	67.37 %	74.71 %	100.24 %
Dividends Exemption						
Percentage Exempt	100.00 %	100.00 %	0.00 % ²⁾	95.00 %	100.00 %	100.00 %
Minimum Holding	0.00 %	0.00 %	5.00 %	0.00 % ¹⁾	10.00 % ¹⁾	10.00 %
Minimum Holding Period (months)	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %
Capital Gains Exemption						
Percentage Exempt	100.00 %	0.00 %	100.00 % ³⁾	100.00 %	100.00 %	100.00 %
Minimum Holding	0.00 %	0.00 %	5.00 %	0.00 % ²⁾	10.00 % ²⁾	0.00 %
Minimum Holding Period	0.00 %	0.00 %	12.00 %	12.00 %	0.00 %	0.00 %

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Holding Companies - 2005

A European Comparison

Country	Gibraltar	Greece	Ireland	Italy	Luxembourg	Malta
(months)						
Other Conditions						
Maximum Passive Income Allowed	100.00 %	0.00 %	0.00 % ⁴⁾	0.00 % ³⁾	100.00 %	100.00 %
Subject to Tax (minimum rate)	0.00 %	25.00 %	0.00 %	0.00 % ⁴⁾	11.00 % ³⁾	35.00 %
Trading Activities Allowed	Y	Y	Y	Y	Y	N
Interest Expense Deduction						
Debt Equity Ratio	N	N		4:1	6:1	n/a
Related Interest Expense Allowed	Y	N	Y	Y	Y	Y
Withholding Tax on Interest Paid	0.00 %	20.00 %	0.00 %	12.50 % ⁵⁾	0.00 %	15.00 % ³⁾
Other Deductions						
Investment Cost write-down	Y	N	N	N	Y	Y
Goodwill write-off	Y	N	N	N	Y ⁴⁾	Y
Participation Exemption applies to:						
Partnerships	N	N	Y	Y	Y	N
Permanent Establishment Of EU Company	N	N	N	Y	Y	N
Permanent Establishment Of Treaty Company	N	N	N	Y	Y	N
Branch of Foreign Company	N	N	Y	Y	Y	N
Resident Company	Y	N	N	Y	Y	Y
Company Legal Form	Ltd	LTD	Ltd	SRL	Sarl	LTD
Minimum Capital (Euros)	€140	€18.000	€2	€10.000	€12.400	€1.500
Time to Form (weeks)	1	2	2	1	0	1
Shareholders	Y	Y	Y	Y	Y	Y

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Country	Gibraltar	Greece	Ireland	Italy	Luxembourg	Malta
Minimum Number	1	1	1	1	0	1
Nationality	ANY	ANY	ANY	ANY	ANY	ANY
Corporate or Individual	BOTH	BOTH	BOTH	BOTH	BOTH	BOTH
Directors	Y	Y	Y	Y	Y	Y
Minimum Number	1	1	2	1	0	1
Nationality	ANY	ANY	1 Irish or bond	ANY	ANY	ANY
Corporate/Individual	BOTH	BOTH	individual	BOTH	NONE	BOTH
Company Legal Form	Plc	SA	PLC	SPA	SA	Ltd
Min Capital (Euros)	€70.000	€60.000	€38.000	€120.000	€31.000	€1.500
Time to Form (weeks)	1	3	2	1	0	1
Shareholders	Y	Y	Y	Y	Y	Y
Minimum Number	7	2	7	1	0	1
Nationality	ANY	ANY	ANY	ANY	ANY	ANY
Corporate or Individual	BOTH	BOTH	BOTH	BOTH	BOTH	BOTH
Directors	Y	Y	Y	Y	Y	Y
Minimum Number	2	3	2	1	0	1
Nationality	ANY	ANY	1 Irish or bond	ANY	ANY	ANY
Corporate/Individual	BOTH	BOTH	BOTH	BOTH	BOTH	BOTH
Capital Tax						
Capital Contribution Tax	0.00 %	1.10 %	0.50 %	0.00 %	⁶⁾ 1.00 %	0.00 % ⁵⁾
Exemptions possible	N	N	Y	N	⁷⁾ Y	N
Withholding Tax :						
Number of Tax Treaties	0	34	40+	60+	46	30+
Offshore Parent Company	0.00 %	0.00 %	20.00 %	27.00 %	20.00 %	0.00 % ⁶⁾
Treaty Co Parent (maximum)	0.00 %	25.00 %	0.00 %	15.00 %	0.00 % ⁵⁾	0.00 % ⁷⁾
Non-Resident Individual	0.00 %	0.00 %	20.00 %	27.00 %	20.00 %	0.00 % ⁸⁾

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Holding Companies - 2005

A European Comparison

Country	Gibraltar	Greece	Ireland	Italy	Luxembourg	Malta
Resident Individual	0.00 %	0.00 %	20.00 %	0.00 % ⁸⁾	20.00 %	0.00 % ⁹⁾
Income Tax Exemption for Resident Individual	0.00 %	100.00 %	0.00 %	60.00 %	50.00 %	0.00 % ¹⁰⁾
Parent Subsidiary Directive						
Withholding Tax	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 % ¹¹⁾
Minimum Holding	25.00 %	20.00 %	0.00 %	25.00 %	10.00 % ⁶⁾	0.00 %
Minimum Period (Months)	4	0	12	12	0	0
Disclosure						
Disclosure of Beneficial Owner	N	Y	Y	Y	Y ⁷⁾	N
Banking Secrecy	Y	Y	Y	Y ⁹⁾	Y	Y
File Statutes	Y	Y	Y	Y	Y	Y
File Accounts	Y	Y	Y	Y	Y	Y

Notes:

Italy:

- 1) Not applicable
- 2) Not applicable
- 3) Not applicable
- 4) Not applicable
- 5) if the holding is resident in a tax haven
- 6) Not applicable
- 7) Not applicable
- 8) If the resident individual holds more than 20% of
- 9) it is compulsory to be registered at the Italian E

Luxembourg g:

- 1) 10% or 1,200,000.
- 2) 10% or 6,000,000.
- 3) More than 15%.
- 4) For ten years.
- 5) 0% to 15%.
- 6) 10% or 1,200,000.
- 7) To banks.

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Malta:	<ol style="list-style-type: none">1) or nin months from accounting date2) Non resident shareholders of International Holding Companies holding a participating share in subsidiaries, receive full refund of the tax paid by the company upon the payment of a dividend3) A deduction of 15% withholding tax on interest is considered as a final withholding tax and there would be no further payments or refunds4) Dividends and capital gains are taxed at 35%. Non malta resident shareholders receive a full refund of tax paid by the company if investment in holding qualifies5) Scale rate with a minimum of 3606) Dividends are distributed net of tax and no withho7) Dividends are distributed net of tax and no withho8) Dividends are distributed net of tax and no withho9) Dividends are distributed net of tax and no withho10) Dividends are distributed net of tax and no withho11) Dividends are distributed net of tax and no withho
Portugal:	<ol style="list-style-type: none">1) EU only2) N/A3) Subject to tax, but not minimum tax rate4) 20% if paid to a non-resident or 15% if paid to a resident.5) N/A6) N/A7) To the tax authorities.
Russia:	<ol style="list-style-type: none">1) Capital gains exemption is not applicable when foreign shareholder sales it's equity stake of company where real estate, located in Russian Federation exceeds 50% of it's assets2) maximum 503) No exact data4) Tax rate depends on type of income (dividends are
Spain:	<ol style="list-style-type: none">1) 5% or 6,000,000.2) 5% or 6,000,000.3) As long as final subsidiary carries business activities.4) Direct tax.5) Betwee 15% and 0%.

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Information up-to-date as at:	Jan. 1, 2005	Jan. 1, 2005	Feb. 28, 2005	Jan.1, 2005	Jan. 1, 2005	Jan. 1, 2005
Tax declaration deadline	June	May	March	July	May	September
Standard Corporate Tax Rate	31.36 %	25.00 %	24.00 %	35.00 %	28.00 %	21.32 % ¹⁾
Pre Tax Cash Available to Parent	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000	€2.540.000
Withholding Tax on Interest Paid	€0	€50.000	€50.000	€37.500	€0	€0
Withholding Tax on Dividend Paid	€513.700	€525.000	€244.500	€330.375	€624.000	€745.535
Corporate Tax	€235.200	€190.000	€660.000	€87.500	€210.000	€159.900
Net Cash received by Parent Company	€1.791.100	€1.775.000	€1.585.500	€2.084.625	€1.706.000	€1.634.565
Profit Before Interest and Tax	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Withholding Tax on Interest Paid	0.00 %	1.97 %	1.97 %	1.48 %	0.00 %	0.00 %
Withholding Tax on Dividend Paid	20.22 %	20.67 %	9.63 %	13.01 %	24.57 %	29.35 %
Corporate Tax	9.26 %	7.48 %	25.98 %	3.44 %	8.27 %	6.30 %
Net Cash received by Parent Company	70.52 %	69.88 %	62.42 %	82.07 %	67.17 %	64.35 %
Dividends Exemption						
Percentage Exempt	100.00 %	100.00 % ¹⁾	0.00 %	100.00 %	100.00 % ¹⁾	100.00 %
Minimum Holding	5.00 %	10.00 %	0.00 %	5.00 % ¹⁾	10.00 % ²⁾	20.00 %
Minimum Holding Period (months)	0.00 %	12.00 %	0.00 %	12.00 %	12.00 %	0.00 %
Capital Gains Exemption						
Percentage Exempt	100.00 %	50.00 %	100.00 % ¹⁾	100.00 % ²⁾	100.00 % ³⁾	100.00 %
Minimum Holding	5.00 %	10.00 %	0.00 %	5.00 %	10.00 % ⁴⁾	20.00 %
Minimum Holding Period	0.00 %	12.00 %	0.00 %	12.00 %	12.00 %	12.00 %

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Holding Companies - 2005

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Country	Netherlands	Portugal	Russia	Spain	Sweden	Switzerland
(months)						
Other Conditions						
Maximum Passive Income Allowed	100.00 %	0.00 % ²⁾	0.00 %	100.00 % ³⁾	100.00 %	100.00 %
Subject to Tax (minimum rate)	10.00 %	0.00 % ³⁾	10.00 %	0.00 % ⁴⁾	15.00 %	100.00 %
Trading Activities Allowed	Y	Y	Y	Y	Y	Y
Interest Expense Deduction						
Debt Equity Ratio	3:1	2:1	3:1	3:01:00	N	Y ²⁾
Related Interest Expense Allowed	Y	Y	Y	Y	Y	Y
Withholding Tax on Interest Paid	0.00 %	20.00 % ⁴⁾	20.00 %	15.00 % ⁵⁾	0.00 %	0.00 %
Other Deductions						
Investment Cost write-down	Y	N	N	Y	N ⁵⁾	Y ³⁾
Goodwill write-off	Y	N	N	Y	Y	Y
Participation Exemption applies to:						
Partnerships	N	N	N	N	N	N
Permanent Establishment Of EU Company	N	Y	N	Y	N	Y
Permanent Establishment Of Treaty Company	N	N	N	Y	N	Y
Branch of Foreign Company	N	N	N	Y	N	Y
Resident Company	Y	Y	N	Y	Y	Y
Company Legal Form	BV	LDA	LLC and CJSC	SL	AB	GmbH
Minimum Capital (Euros)	€18.000	€5.000	€270	€3.006	€11.000	€13.000
Time to Form (weeks)	2	16	0	3	2	2
Shareholders	Y	Y	Y	Y	Y	Y

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Holding Companies - 2005

A European Comparison

Country	Netherlands	Portugal	Russia	Spain	Sweden	Switzerland
Minimum Number	1	1	1	1 ²⁾	1	1
Nationality	ANY	ANY	ANY	ANY	ANY	any
Corporate or Individual	BOTH	BOTH	BOTH	BOTH	BOTH	both
Directors	Y	Y	Y	Y	Y	Y
Minimum Number	1	1	1	1	1	1
Nationality	ANY	ANY	ANY	ANY	ANY	any
Corporate/Individual	BOTH	BOTH	BOTH	BOTH	BOTH	individual
Company Legal Form	NV	SA	OJSC	SA	AB Public	AG
Min Capital (Euros)	€45.500	€50.000	€2.700	€60.102	€55.000	€66.666
Time to Form (weeks)	2	16	0	3	2	2
Shareholders	Y	Y	Y	Y	Y	Y
Minimum Number	1	5	1	1	1	1
Nationality	ANY	ANY	ANY	ANY	ANY	any
Corporate or Individual	BOTH	BOTH	BOTH	BOTH	BOTH	both
Directors	Y	Y	Y	Y	Y	Y
Minimum Number	1	1	1	1	3	1
Nationality	ANY	ANY	ANY	ANY	ANY	⁶⁾ Swiss Majority
Corporate/Individual	BOTH	BOTH	BOTH	BOTH	INDIVIDUAL	individual
Capital Tax						
Capital Contribution Tax	0.55 %	0.00 %	⁵⁾ 0.00 %	1.00 %	0.00 %	1.00 %
Exemptions possible	Y	N	⁶⁾ N	Y	N	Y ⁴⁾
Withholding Tax :						
Number of Tax Treaties	100+	46	n/d	³⁾ 51	100+	100+
Offshore Parent Company	25.00 %	25.00 %	15.00 %	⁴⁾ 15.00 %	30.00 %	35.00 %
Treaty Co Parent (maximum)	15.00 %	15.00 %	15.00 %	15.00 %	15.00 %	15.00 %
Non-Resident Individual	25.00 %	25.00 %	30.00 %	15.00 %	30.00 %	35.00 %

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Holding Companies - 2005

A European Comparison

Country	Netherlands	Portugal	Russia	Spain	Sweden	Switzerland
Resident Individual	25.00 %	15.00 %	9.00 %	15.00 %	30.00 %	0.00 % ⁵⁾
Income Tax Exemption for Resident Individual	100.00 %	50.00 %	100.00 %	0.00 %	100.00 %	0.00 %
Parent Subsidiary Directive						
Withholding Tax	0.00 %	0.00 %	15.00 %	0.00 %	0.00 %	0.00 %
Minimum Holding	20.00 %	20.00 %	0.00 %	25.00 %	25.00 %	20.00 %
Minimum Period (Months)	12	12	0	12	12	0
Disclosure						
Disclosure of Beneficial Owner	Y	Y	⁷⁾ Y	Y	Y	Y ⁶⁾
Banking Secrecy	Y	Y	Y	N	N	Y
File Statutes	Y	Y	Y	Y	Y	Y
File Accounts	Y	Y	Y	Y	Y	Y

Notes:

- Sweden:**
- 1) Differs between listed and non listed companies.
 - 2) More than 10%.
 - 3) Capital gains are only on shares that are attributable to business activity.
 - 4) More than 10%.
 - 5) No, if in subsidiaries, otherwise yes.
 - 6) 50% must be resident inside the EU.

- Switzerland**
- 1) Pure holding companies are only taxed at the Federal level, effective tax rate: 7.83%; no cantonal and communal income taxes for pure holding companies
 - 2) The tax administration has issued a detailed list of requirements that indicates the allowed maximum of debt in relation to certain assets (e.g. 70%-80% for immovable property)
 - 3) write-off period of 5 years
 - 4) first Euro 166,660 (=CHF 250,000) are exempt
 - 5) withholding tax must be paid and then reclaimed
 - 6) GmbH: yes / AG: no

- United**
- 1) 12 months after accounting year has ended

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Holding Companies - 2005

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Kingdom: 2) capital gains are exempted if the selling company is a member of a trading group AND it has owned the shares sold for at least 12 months during the last 24 months AND the shares sold are shares in a trading company
3) between 0 and 20 percent

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Holding Companies - 2005

A European Comparison

Country	United Kingdom	
Information up-to-date as at:	Jan. 26, 2005	
Tax declaration deadline	December	1)
Standard Corporate Tax Rate	30.00 %	
Pre Tax Cash Available to Parent	€2.540.000	
Withholding Tax on Interest Paid	€50.000	
Withholding Tax on Dividend Paid	€0	
Corporate Tax	€233.000	
Net Cash received by Parent Company	€2.257.000	
Profit Before Interest and Tax	100.00 %	
Withholding Tax on Interest Paid	1.97 %	
Withholding Tax on Dividend Paid	0.00 %	
Corporate Tax	9.17 %	
Net Cash received by Parent Company	88.86 %	
Dividends Exemption		
Percentage Exempt	0.00 %	
Minimum Holding	0.00 %	
Minimum Holding Period (months)	0.00 %	
Capital Gains Exemption		
Percentage Exempt	0.00 %	2)
Minimum Holding	10.00 %	

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Holding Companies - 2005

A European Comparison

Country	United Kingdom	
Minimum Holding Period (months)	12.00 %	
Other Conditions		
Maximum Passive Income Allowed	100.00 %	
Subject to Tax (minimum rate)	30.00 %	
Trading Activities Allowed	Y	
Interest Expense Deduction		
Debt Equity Ratio		
Related Interest Expense Allowed	Y	
Withholding Tax on Interest Paid	20.00 %	³⁾
Other Deductions		
Investment Cost write-down	N	
Goodwill write-off	N	
Participation Exemption applies to:		
Partnerships	N	
Permanent Establishment Of EU Company	Y	
Permanent Establishment Of Treaty Company	Y	
Branch of Foreign Company	Y	
Resident Company	Y	
Company Legal Form	LIMITED	
Minimum Capital (Euros)	€1	
Time to Form (weeks)	1	

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Holding Companies - 2005

A European Comparison

Country	United Kingdom
Shareholders	Y
Minimum Number	1
Nationality	ANY
Corporate or Individual	BOTH
Directors	Y
Minimum Number	1
Nationality	ANY
Corporate/Individual	BOTH
Company Legal Form	PLC
Min Capital (Euros)	€74.500
Time to Form (weeks)	2
Shareholders	Y
Minimum Number	1
Nationality	ANY
Corporate or Individual	BOTH
Directors	Y
Minimum Number	1
Nationality	ANY
Corporate/Individual	BOTH
Capital Tax	
Capital Contribution Tax	0.00 %
Exemptions possible	Y
Withholding Tax :	
Number of Tax Treaties	120+
Offshore Parent Company	0.00 %
Treaty Co Parent (maximum)	0.00 %

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Holding Companies - 2005

A European Comparison

Country	United Kingdom	
Non-Resident Individual	0.00 %	
Resident Individual	10.00 %	
Income Tax Exemption for Resident Individual	0.00 %	
Parent Subsidiary Directive		
Withholding Tax	0.00 %	
Minimum Holding	0.00 %	
Minimum Period (Months)	0	
Disclosure		
Disclosure of Beneficial Owner	Y	
Banking Secrecy	Y	
File Statutes	Y	
File Accounts	Y	

Notes:

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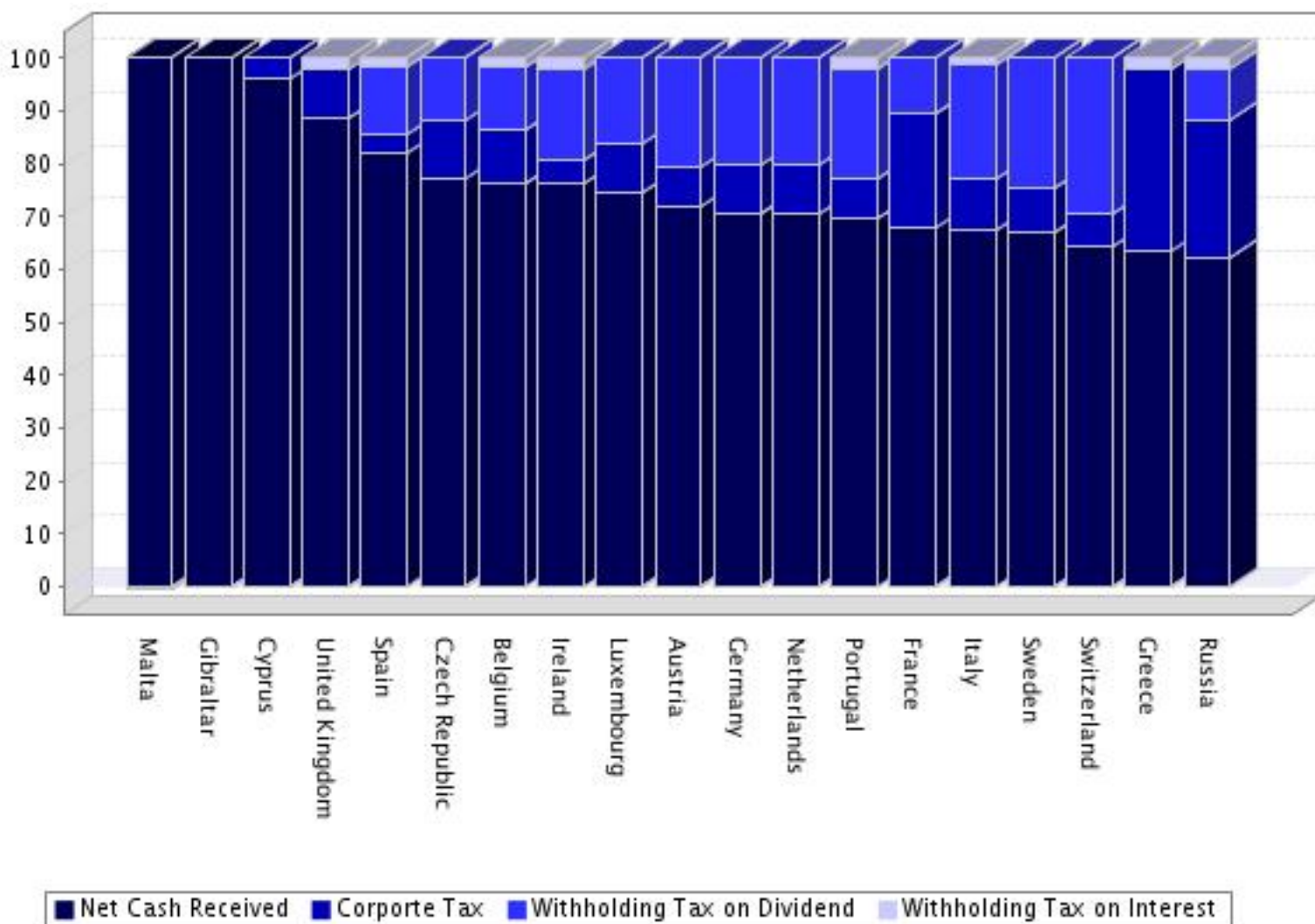
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