

EUROPE LOW TAX HOLDING COMPANIES	Switzerland IP Holding Company	Netherlands IP Holding Company
OUR RANKING IN ORDER OF PREFERENCE	1	2
Summary at a Glance		
Recommended type of business entity?	Switzerland LLC	Netherlands LLC
Allowed to issue preference shares?	Yes	Yes
Local corporation tax rate on IP income?	9.5%	5%
Withholding tax on dividends to USA?	5% or 15%	0-15%
Healy Consultants will secure a certificate of residence?	Yes	Yes
Access to DTAA with the USA?	Yes	Yes
Corporate bank account location?	Switzerland	Luxembourg
Total engagement period?	3 months	2 months
Total engagement costs? (including nominee director services if required)	€27,150	€15,440

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Company registration requirements		
How long to register the company?	3 weeks	3 weeks
Minimum number of directors?	1	1
Resident director(s) required?	Yes, 1	No
Minimum number of shareholders?	1	1
Can Healy Consultants be the professional, passive nominee shareholder?	No	No
Minimum paid up ordinary share capital?	CHF20,000	€1
Lease for local office space required?	No	No
Our Client must travel to EU?	No	No
Public register of shareholders & directors?	<u>Yes</u>	<u>Yes</u>

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Tax and accounting considerations		
Will the company be classed as tax resident?	Yes	Yes
How long to secure a specific IP license from the Government?	Not required	Not required
How long to secure certificate of residence from Government?	Up to 2 months	Up to 3 months
Withholding tax on preference share dividends to USA shareholder?	5% or 15%	0-15%
Can license income be exempt from corporate tax under certain criteria?	Only reduced rate of 8.5%	Only reduced rate up to 5%
Can dividend income be exempt from corporate tax under certain criteria?	Only reduced rate of 8.5%	Only reduced rate up to 5%
Must company management and control be from within EU?	Yes, within Switzerland	No
Must register for EU VAT?	No	Yes

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Must hire local employees to be considered a tax resident company?	No	No
Legal and compliance considerations		
Annual tax return to be submitted?	Yes	Yes
Annual financial statements required?	Yes	Yes
Independent statutory annual audit required?	<u>No</u>	<u>No</u>
Will the country banks apply FATCA?	<u>Yes</u>	<u>Yes</u>
Exchange of tax information with IRS?	<u>Yes</u>	<u>Yes</u>
Blacklisted "tax haven" jurisdiction?	No	No
Is there a license box available?	<u>Yes, in Niwalden</u>	<u>Yes, called Innovation Box</u>
Tax benefits of the license box?	Corporation rate of 8.5%	Corporation rate of 5%

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Will I need to demonstrate I registered patent/IP to benefit from license box?	Yes	Yes
Bank account characteristics		
Healy Consultants' preferred bank?	CIM Banque	RCB Luxembourg
Do I travel to open the bank account?	No	No
How long to secure corporate bank account approval?	4 weeks	4 weeks
Minimum deposit (€)?	€10,000	€0
Corporate € visa debit card available?	Yes	Yes
Corporate US\$ visa debit card available?	Yes	Yes
Corporate ATM card available?	No	No
Bank rating by World Economic Forum?	20th	12th

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Quality of online banking?	Excellent	Excellent
Logistics considerations		
Virtual office services available?	Yes	Yes
Allowed to make sales to foreign Clients?	No (holding company only)	No (holding company only)
Allowed to make sales to local Clients?	No (holding company only)	No (holding company only)
Monthly preference shares dividends allowed?	No	No
Quarterly preference shares dividends allowed?	No	No
Daily bank funds transfer limit?	Up to 5 transactions	Up to US\$100,000

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