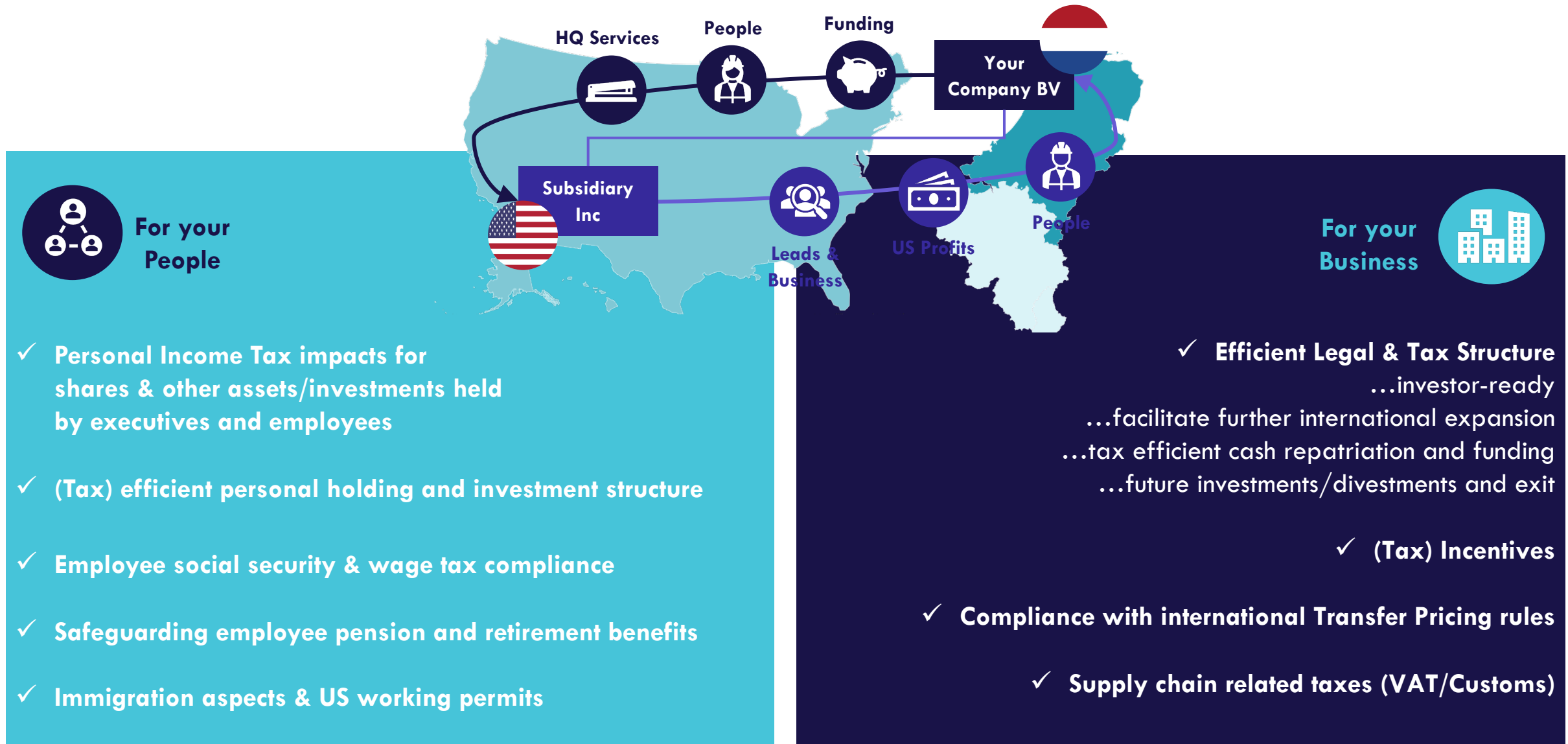


VICTORY LOVES PREPARATION



TAX THEMES TO CONSIDER WHEN EXPANDING TO THE US



For your People

- ✓ Personal Income Tax impacts for shares & other assets/investments held by executives and employees
- ✓ (Tax) efficient personal holding and investment structure
- ✓ Employee social security & wage tax compliance
- ✓ Safeguarding employee pension and retirement benefits
- ✓ Immigration aspects & US working permits

For your Business



- ✓ Efficient Legal & Tax Structure
 - ...investor-ready
 - ...facilitate further international expansion
 - ...tax efficient cash repatriation and funding
 - ...future investments/divestments and exit
- ✓ (Tax) Incentives
- ✓ Compliance with international Transfer Pricing rules
- ✓ Supply chain related taxes (VAT/Customs)

DUTCH TAX CLIMATE TRIAD

The Dutch tax system has many attractive features for international companies - the basis is formed by the following three pillars:



Extensive Tax Treaty Network

To avoid that you pay tax on your income or your capital more than once, the Netherlands has concluded tax treaties with around 100 different countries, effectively reducing global withholding tax exposure.



100% Participation Exemption

The Dutch participation exemption regime aims to eliminate economic double corporate taxation of profit distributions paid by a subsidiary to its parent company, including capital gains.



Strong & Robust Ruling Practice

The opportunity to discuss the tax treatment of certain operations or transactions in advance. Upfront certainty in advance for an extended period can be obtained from the Dutch Tax Authorities.

EXAMPLE STRUCTURE TRANSFER PRICING WITH US PRESENCE

