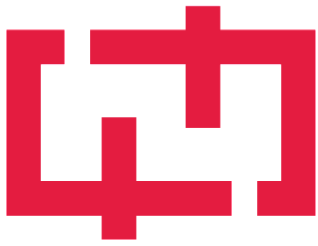


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Typical Application of Structures in Australia

	BUSINESS ENTERPRISE	INVESTMENT	RETIREMENT /MIGRATION [VEHICLE TO HOLD ASSETS]	IPO	FUNDRAISING [MANAGED FUNDS]
COMPANY	•	•	•	•	•
RECOGNISED FOREIGN COMPANY [BRANCH]	•	•	•	•	•
JOINT VENTURE OR PARTNERSHIP	•	•			•
TRUST	•	•	•	•	•
SOLE TRADER	•	•	•		

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Notes

- Companies are not entitled to the 50% discount on assets held for greater than 12 months
- Joint Venture participants and partners are entitled to the 50% discount provided they are not companies
- The branch does not need to be the head or holding company it can be a subsidiary of the holding company established specifically for the purpose of establishing the branch
- Thin Capitalisation rules applies to foreign investment in Australia subsidiaries, which restricts the interest deduction to funding sourced from overseas
- Interest is usually subject to a 10% withholding tax which is a final tax
- Franked Dividends are exempt from withholding tax
- Unfranked Dividends are subject to withholding tax at 15% or higher
- Income from Trusts retain their character



Chartered Accountant

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