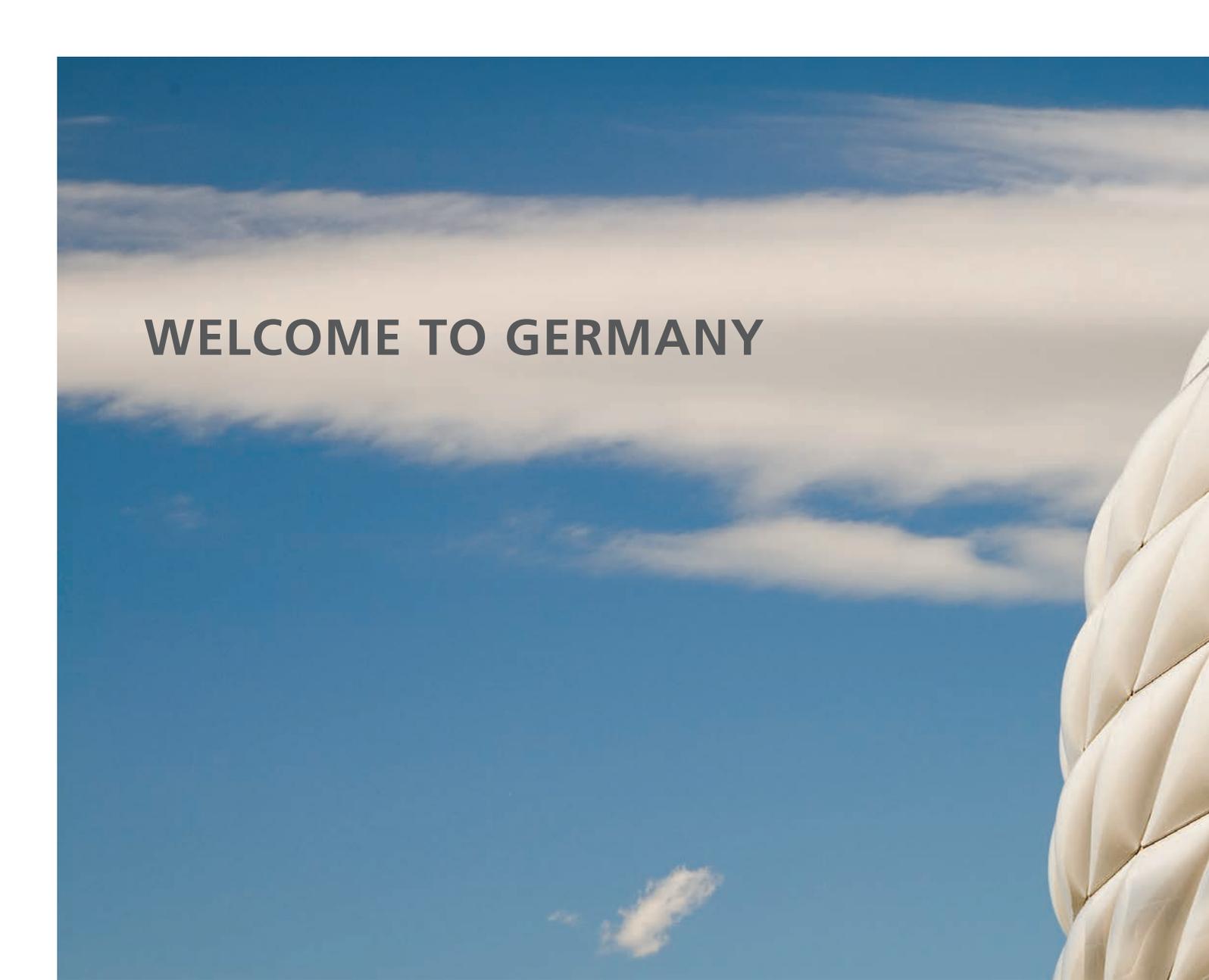




EBNER
STOLZ

**INVEST IN GERMANY –
WITH EBNER STOLZ AT YOUR SIDE**



WELCOME TO GERMANY

Germany is known internationally as one of the best places to do business, offering investors

... THE LARGEST MARKET IN EUROPE

Germany has 80 million consumers – 21 percent of the European market – and enjoys generous per capita income, making it the largest market in the European Union. This is confirmed by Germany's high level of purchasing power, €21,579 per person in 2014, putting it among the Top Ten in Europe.

... GOOD ECONOMIC PROSPECTS

The positive economic trend for 2014 is continuing in 2015, with GDP growth expected to be 1.5 percent. Exports increased considerably in 2014, not least due to the weakness of the Euro. Domestic demand is also high, thanks to low unemployment and the country's bright economic outlook.



... AN INTERNATIONAL HUB

Germany's central location in the heart of Europe lets investors access the entire market of the European Union, as well as Central and Eastern Europe. Companies benefit from well-developed infrastructure, including efficient road, rail, and telecommunication networks.

... GROWTH SECTORS

Germany is the largest economy in the European Union and is known all over the world for its innovation, cutting-edge technology, and high productivity. Germany holds top positions in a range of growth industries. It is a leader in the development of fuel-efficient engines and alternative drive systems,

the use of renewable energy sources and heat insulation, and promoting energy efficiency. The leading sectors for foreign investment in Germany are modern information and communication technologies and software, services, motor vehicles, mechanical engineering, and chemicals.

... A SKILLED WORKFORCE

Workers in Germany are highly qualified, reliable, and conscientious. More than 80 percent of the German workforce has a university degree or vocational training. Most professional and vocational training follows the dual model, which is admired and imitated all over the world. German workers are internationally renowned for being highly motivated. Growth in labor costs is low, and an average is only 2 percent annually.

... INNOVATION AND RESEARCH

Germany has long been known as the land of poets and thinkers. These days, Germany spends a lot – including state subsidies – on research and development by its thinkers. Research intensity was 2.85 percent in 2013, anticipating the EU's 3 percent target for 2020. Germany is home to 21 percent of all European scientists.

... LEGAL CERTAINTY

Stability and long-term security are important factors when deciding to invest in a project or make a financial commitment to a location. Germany's efficient legal system ensures the necessary legal certainty. The same legal background conditions apply throughout German territory, a prerequisite

for legal clarity. There is also due regard for the welfare of the country's citizens, including health insurance, services for people who require care or are unemployed, and benefits for low-paid workers. This ensures a shared culture of solidarity and promotes social satisfaction.

... REASONABLE RED TAPE

Foreigners can invest in Germany quickly and with little paperwork. Possible legal forms include various independent companies and partnerships, as well as branch offices or permanent establishments.

... A CLEAR TAX SYSTEM

Germany has a consistent system of taxation with moderate tax rates. For example, the average corporate income tax is less than 30 percent. Value-added tax is 19 percent, below the average for Europe. All operating expenses can be deducted when determining a company's assessment basis. Germany has entered into double taxation agreements with many other countries, which prevents double taxation in most cases. In addition to tax incentives for certain economic activities, the government also offers numerous subsidies for eligible projects.

... ALL TOGETHER

Germany offers investors a broad choice of promising business fields. The background conditions for those fields – business, legal, and tax-related – are excellent. Ebner Stolz will gladly assist you as you plan and carry out your investments in Germany.

YOUR PARTNER EBNER STOLZ

Ebner Stolz has 14 locations in Germany with some 1,100 employees offering one-stop multidisciplinary consulting services. Auditors, tax advisors, lawyers, and management consultants form teams to work closely on projects and when serving clients. This ensures that solutions can be developed and successfully implemented in light of all business, tax, and civil law concerns.

Clients include German companies operating in Germany and internationally, as well as many subsidiaries of international groups, branches of foreign companies, and financial investors with holdings in Germany. Ebner Stolz provides all-round services or works on individual projects for them. Thanks to close cooperation with consultants in over 100 countries through the NEXIA International network of independent auditing and consulting firms, all work on cross-border issues reflects the requirements of any other countries that are involved. This leads to optimum results from the viewpoint of both the other countries and Germany. Employee exchanges among consulting firms in the Nexia network allow our employees to gain insight and a better understanding of the economic, legal, and cultural features of other countries.



PLANNING TO INVEST IN GERMANY?

Are you interested in investing in Germany but don't yet have enough information about the economic sector or the industry you'd like to get involved in? Ebner Stolz will assist you from the time of your initial decision.

Our services include the following:

- › Assistance when looking for appropriate investments in Germany
- › Making contacts in specific sectors
- › Analyzing market risks and opportunities
- › Reviewing potential strategies for entry
- › Support in finding a location.

DO YOU STILL NEED TO PLAN A SPECIFIC INVESTMENT IN GERMANY?

Once the decision has been made to engage in an economic activity and make the necessary investment, numerous business, legal, and tax-related questions – often intertwined – will have to be answered. We support you in that initial work and ensure that all rules and regulations – both in Germany and in your country of origin – are taken into account during the planning process, and also that risks and opportunities are properly considered based on individual circumstances.

Our services include the following:

- › Assistance in seeking and raising capital
- › Support in recruiting qualified employees
- › Fulfillment of residency requirements (particularly related to visas)
- › Support in fulfillment of notification and registration requirements
- › Support in creating administrative structures
- › Handling of internal administrative tasks

- › Filling advisory positions (foundation board, supervisory board, or advisory board members)
- › Preparation of business plans and plausibility checks of plans.

WHAT LEGAL STRUCTURES MUST BE IMPLEMENTED?

You will generally be the one to provide the business know-how, from coming up with the business idea to implementing it, and from entering the German market to expanding into larger regions. We're there to assist you with questions related to the proper legal form of your investment in Germany – including the numerous tax issues – and to structuring company acquisitions and group or financing structures. We develop solid plans with a view to the overarching entity, the international group, taking into account the individual requirements for the new German location. Our multidisciplinary approach ensures that all economic, legal, and tax aspects are coordinated and smoothly integrated into your existing structures.

Our services include the following:

- › Legal and tax advisory services when choosing the right legal form and creating companies
- › Support in registering business establishments in Germany
- › Due diligence (financial, tax, legal) when acquiring companies
- › Structuring and negotiating company acquisition agreements
- › Advice on implementing tax-optimized corporate structures
- › Advice on implementing financial structures within your group
- › Legal and tax advisory services during company conversions, including consulting on restructuring and reorganization.

DO YOU NEED ADVICE ON RECURRING OBLIGATIONS?

Once you have invested in a corporate form in Germany, and once all structural issues have been resolved, recurring obligations under national and international accounting requirements or tax regulations will have to be fulfilled in Germany and other relevant countries. That's why the Ebner Stolz consulting approach goes beyond planning issues to include ongoing support for your company. During this phase, we keep an eye on your company's existing structures so they can be adapted when needed based on changes in the law and practice trends at government agencies or in the company or corporate group.

Our services include the following:

- › Financial and payroll accounting
- › Preparation of tax returns and ongoing tax advice concerning all relevant types of taxes
- › Participation in and representation during external tax audits
- › Legal advice and structuring of contracts, particularly relating to cross-border matters
- › Preparation and auditing of annual financial statements under HGB, IFRS, and US GAAP
- › Assistance with internal reporting based on foreign rules and regulations (such as tax accounting for US purposes).

ISSUES RELATED TO SPECIFIC CROSS-BORDER SUBJECTS?

Tax and legal aspects of cross-border operations are complex because the interests and requirements of at least two different jurisdictions must be taken into account. Regulations in different countries are often not harmonized, which can lead to different applications of fundamentally similar requirements. Ebner Stolz works closely with international partners from the NEXIA International consultant network to resolve any tax and legal issues that may arise in Germany due to your foreign operations, or in other countries due to your activities in Germany. Close professional and personal relationships with our colleagues in more than 100 countries mean we can guarantee that answers can be found based on quality standards that are equally high from both the German and the non-German viewpoint.

Our services include the following:

- › Assistance with applications for exemption certificates to avoid tax withholding on dividends and licenses
- › Advice on whether tax incentives are applicable under double taxation agreements
- › Legal and tax advice when posting employees outside of Germany
- › Advice on cross-border structuring and organization
- › Development of strategies to minimize exit taxation in Germany
- › Generation of transfer pricing documentation and advice on structuring and implementing transfer pricing models
- › Income allocation between parent company and business establishments
- › Consulting on value-added tax and customs tariffs.

MATTERS OF CONCERN TO COMPANY OWNERS?

Questions related to a company's business, legal, and tax matters outside of Germany and investments in Germany may have been answered, but what about the owner of the company or the individual shareholders behind companies? Ebner Stolz does more than advise multinational corporations, and is particularly interested in serving the people who are ultimately responsible for the success of their companies. In addition to providing advice on investing and managing assets, the focus in this area is on corporate succession and estate planning. We have always emphasized the importance of making a single contact person available to clients for long-term personal advisory services, so we already enjoy the confidence of many clients, which is vital for this type of consulting.

Our services include the following:

- › Advice on income taxes for individuals in cross-border situations
- › Support for compliance with requirements to declare German assets in other countries (such as FBAR requirements)
- › Structuring and organizing corporate succession plans
- › Cross-border estate planning
- › Legal and tax advisory services in the event of cross-border inheritances.



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Law current as of 18 August 2015

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