

INTCO'S SHAREHOLDERS

Retain entity/sell (0/1)	1	1	1	1	0	Interests sold each year				0	0		
Retain/distribute	0	0	1	1	1	All cash distributed each year				0	0		
Value (share)	2000	2200	4840	4719	4677	0	0	0	0	0	0		
Tax value adjusted	2000	2000	4620	4840	4719	534	0	0	0	0	0		
Tax value (share)	2000	2200	4840	4719	4677	534	0	0	0	0	0		
Franked div int (share)	0	0	0	0	0	0	0	0	0	0	0		
Unfrank div int (share)	0	0	0	0	0	0	0	0	0	0	0		
For'n non-div (share)	0	0	0	0	0	0	0	0	0	0	0		
Foreign divs (share)	None of these ledgers required to implement foreign tax policy mix						0	0	0	0	0		
Total foreign dividends	0	0	0	0	0	0	0	0	0	0	0		
Return of cap (share)	-2000	0	0	0	0	4143	0	0	0	0	0		
Gross tax	0	0	284	242	471	0	0	0	0	0	0		
Credit	0	0	137	116	301	Includes credits for all foreign taxes on IntCo's offshore income					0	0	
FTC non-dividends	0	0	0	0	0	0	0	0	0	0	0		
FTC dividends	0	0	0	0	0	0	0	0	0	0	0		
FTC DWT	0	0	0	0	0	0	0	0	0	0	0		
Xs for'n tax cr non-div	0	0	0	0	0	0	0	0	0	0	0		
Xs for'n tax cr divs	0	0	0	0	0	0	0	0	0	0	0		
Tax paid	0	0	148	126	170	Capital loss on sale of OffCo and liquidation of IntCo (\$4143 capital return less \$4677 purchase price in Year 4)					0	0	
CGT base	200	220	-121	-42	-534	10% pa pre-tax return from IntCo's offshore assets reduced by shareholders' 47% tax rate to 5.3% each year with taxation of distributed net receipts and annual change in asset value through CGT					0	0	
CGT	94	103	-57	-20	-251						0	0	
Post-tax cash flow	-2000	2106	2317	5097	4969	4925						0	0
Post-tax return	0.0	0.0	0.0	0.0	0.0	0.0						0	0
Return(sales) Delete	5.30%	5.30%	5.30%	5.30%	5.30%	5.30%						0	0
Acc overall i tax paid	94	197	341	492	504						0	0	

\$504 local tax consistent with single layer of tax at 47% as no retentions means \$40 bank interest not earned by IntCo and thus \$18 less tax paid at 47%

INTCO'S SHAREHOLDERS (SELLING OUT EACH YEAR) WITH FLOW-THROUGH OF FOREIGN TAX CREDITS USING FRANKING ACCOUNT