Opportunities of the Industrial park «Great Stone» for business in the EU and EAEU

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In Figures

8

clients – Great Stone residents

20

years of experience at the Belarusian market of legal services >50

lawyers in our team – the largest Belarusian law firm

>4000

clients have worked with us

>500

foreign investors have received our consultation

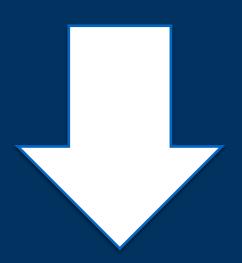
No1

in most nominations of the international legal guides Chambers, The Legal 500, IFLR 1000 among Belarussian law firms

Great Stone: who and what is it for?

Foreign business Localization on the EAEU market customs duty, public procurement - preferential amendment, Access to the market of rule "fifth wheel" China and other Asian countries Belarusian business Business of EAEU /privileges + infrastructure/ Potentially - no fees, recognition of certification Relocation of production from the EAEU countries /privileges + absence of sanctions/

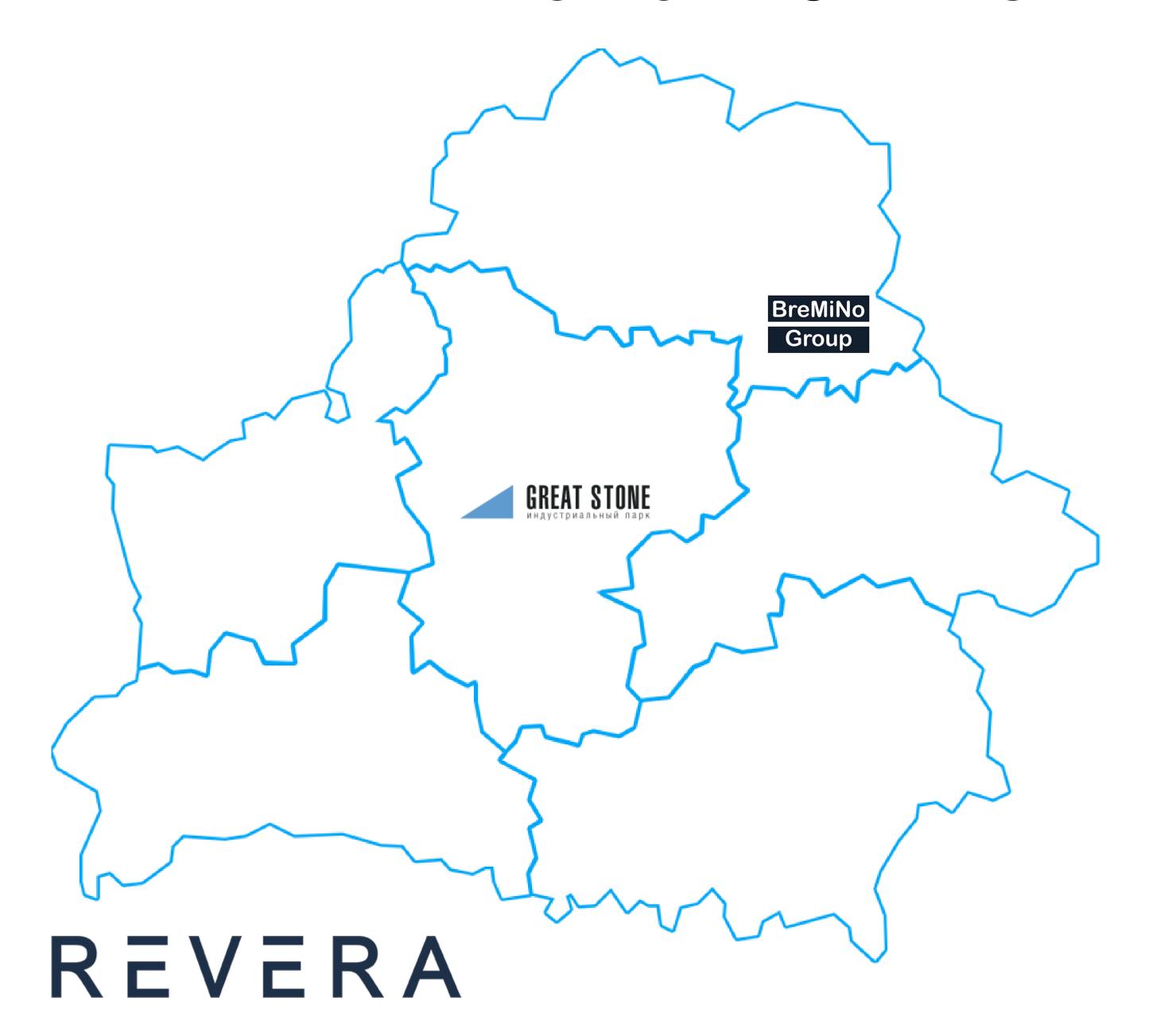
"Great Stone" competitors in Belarus



FEZs Bremino-Orsha HTP Investment treaty Rural areas

The "Great Stone" Park VS FEZs and Bremino-Orsha

The Park. 6 FEZs. Bremino-Orsha



Industrial Park



Bremino-Orsha



FEZs:

- Vitebsk
- Mogilev
- Gomel-Roton
- Brest
- Grodnoinvest
- Minsk

	FEZ and the Park	Exclusively the Park
Tax and customs privileges	 Profit tax Real estate tax Land tax The possibility of applying a free customs zone procedure 	 Personal income tax and insurance contributions to the Social Security Fund (SSF) "Dividend tax" VAT on services provided by foreigners
Non-tax privileges	 No obligation to compensate for removed / transplanted flora objects (etc.) Special work permits for foreigners 	 Construction Migration Currency regulation Free pricing Administrative procedures on a "one station" basis Preferential prices for selected energy resources Guaranteed more profitable regime for business compared to the FEZs and Bremino-Orsha

General regime, FEZs, the Park

	General regime	FEZS	the Park
Dividend tax (income tax / profit tax), %	12-13	12-13	0
Basis for calculating social security contributions, average salaries	5	5	1
Personal income tax, %	13	13	9

The "Great Stone" Park VS Special Economic Zones (Russia)

The Park and Special Economic Zones (Russia)

	The Park	SEZ (Russia)
Profit tax	0 % - 10 years; 9 % - after 10 years	2 % - 5 years; 7 % - from 6 to 10 years; 15,5 % - after 11 years
Real estate tax exemption	43 years (until 2062)	10 years
SSF contributions privileges	Average national wage is the base (at least until 2027)	28 % (until 2019). Now the generally established rate.

Advantageous industries

Ideas

Pharmaceutics	 tax privileges free pricing public procurement decentralized registration procedure 	
TR CU EAEU	 import substitution On machinery and equipment safety (TR CU 010/2011) 	
	On elevators safety (TR CU 011/2011)	
	On wheeled vehicles (TR CU 018/2011)	
	and other 44 TR CU EAEU	

The main areas of the Park activities

- electronics
- pharmaceutics
- fine chemistry
- biotechnologies
- machine building
- new materials

- telecommunications
- integrated logistics
- electronic commerce
- social and cultural activities
- research and advanced development

Requirements for obtaining status of the Park resident

- 1) Implementation of an investment project in the field of the main areas of the Park activities
- 2) Investment volumes
 - \$ 500 000
 (where the term of investment is up to 3 years; for R&D projects regardless of the term)
 - \$ 5 000 000

* exception by decision of the Administration

The Park highlights 1/2

- "Grandfather's" reservation (until 2027)
- Guaranteed more profitable regime for business compared to the FEZ
- Loyalty to labor migrants (visa-free entrance regime for foreigners, Social Security Fund contributions need not be paid for foreign employees)

The Park highlights 2/2

- Free prices (tariffs) for goods of own production (relevant for pharmaceutics)
- Administrative procedures on a "one station" basis
- Preferential prices for selected energy resources
- Legal guarantees are provided by the intergovernmental agreement



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