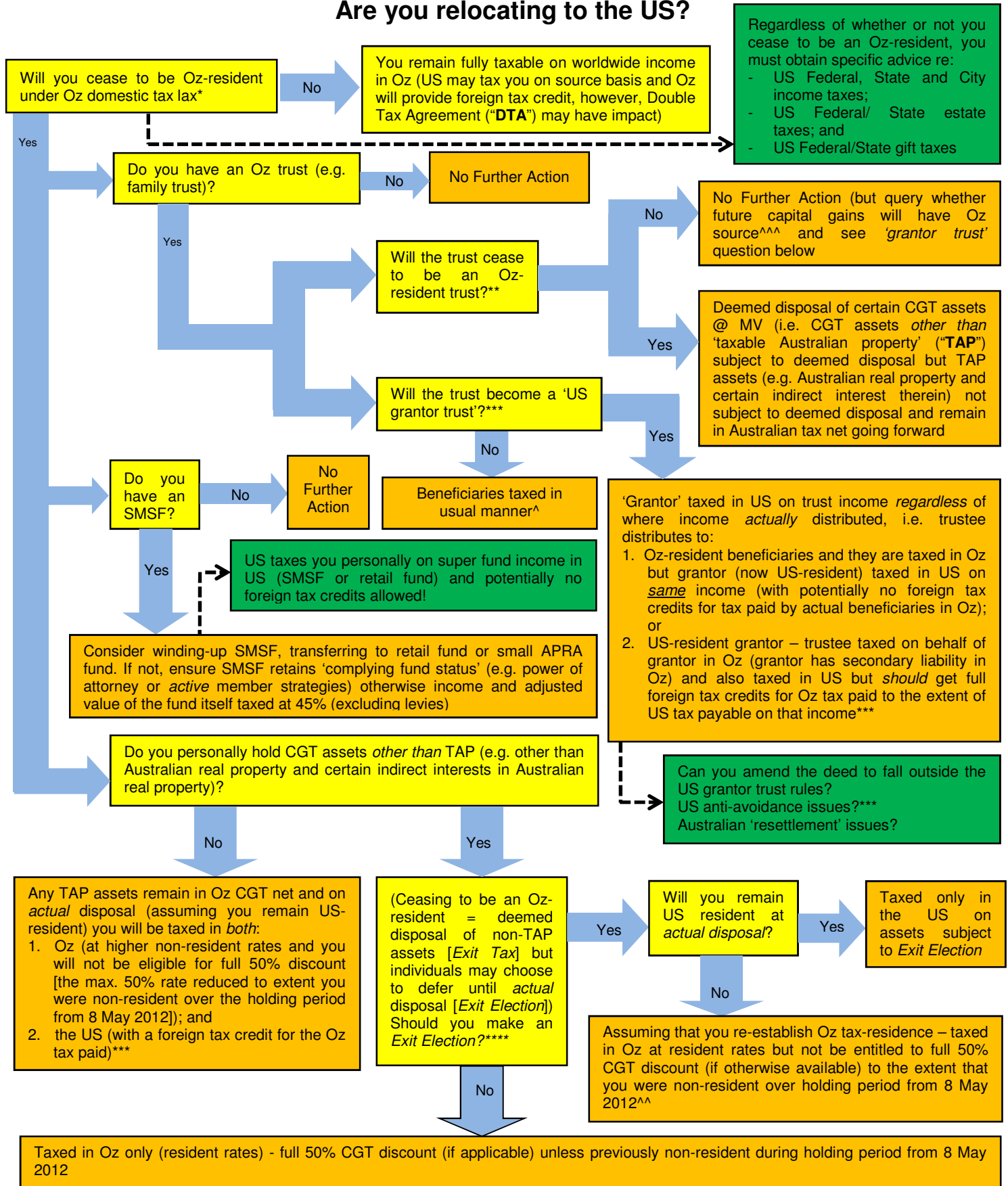


Are you relocating to the US?



* Tax residency requires careful analysis of the facts in light of domestic Australian tax laws;

** Trust residency (other than unit trust) depends on residency of trustee or exercise of central management and control in Oz at any point in income year;

*** These issues must be subject of specific advice by a suitably qualified adviser in the US as part of the overall pre-departure (Australia) and pre-arrival (US) advice package – other potential US tax issues include State-based taxes, Federal estate and gift taxes, and US accruals tax regimes (e.g. Controlled Foreign Company rules, Passive Foreign Investment Company rules and the grantor trust rules referred to above);

**** Whether or not to make Exit Election may depend on level of unrealised capital gains, small business CGT concessions, carry forward losses etc;

^ Beneficiaries taxed on income to which presently/specifically entitled but need to confirm US income tax treatment on actual distributions (at Federal, State and City level [if applicable]);

^^ Also need to consider whether US Exit Tax applies if, amongst other things, you held a Green Card for at least 8 in the last 15 years before giving it up And ceasing to be US-resident (again, this is something for specific US advice at the relevant time).

^^^ Foreign source capital gains flowing through Australian trust to non-resident beneficiary not subject to Australian CGT.

Disclaimer - This is general information only. Specific tax outcomes may only be determined based on the particular circumstances of each case