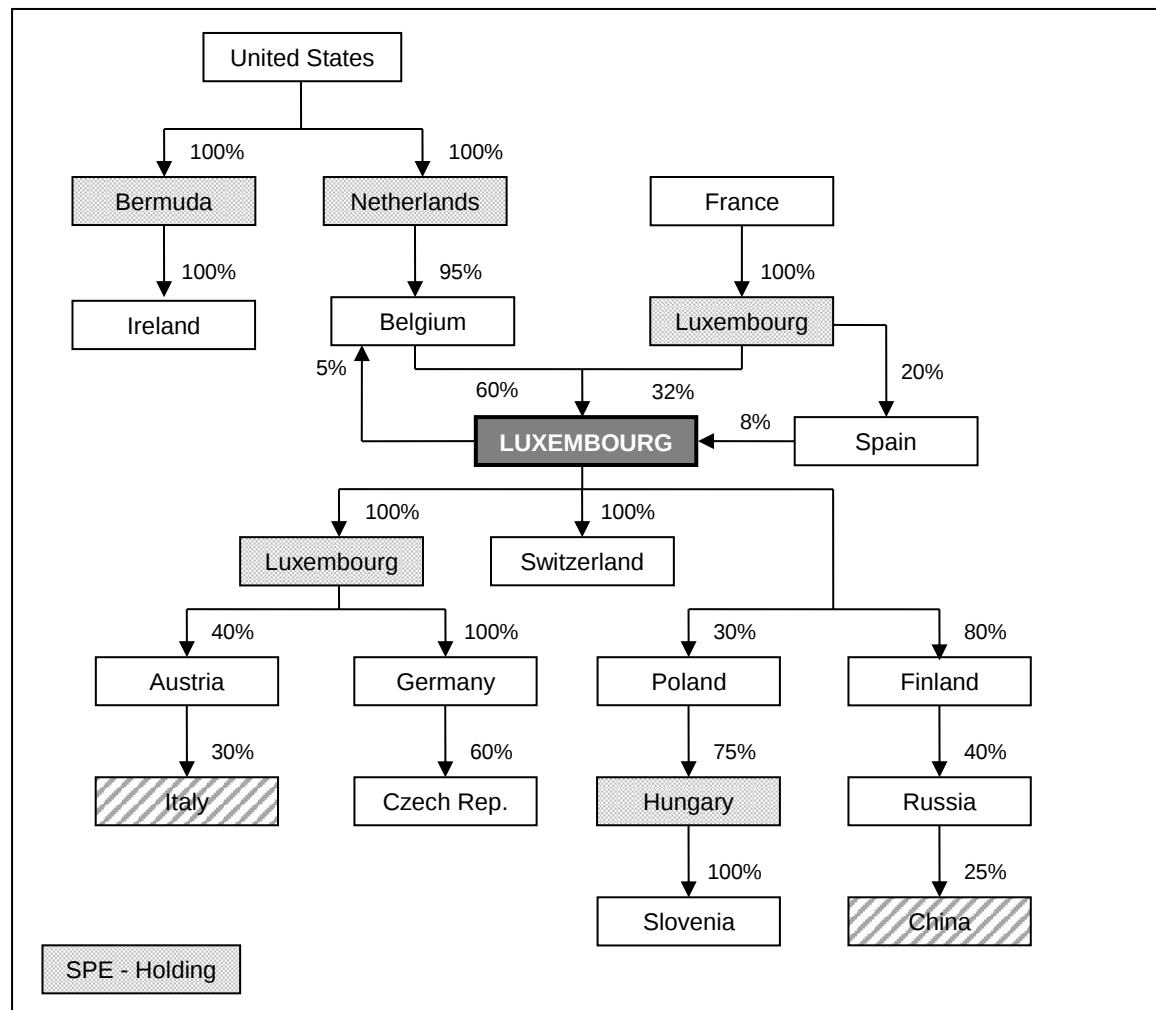




Methodological framework

FDIR – Framework for Direct Investment Relationships

Example :





Tutorial for reading the FDIR :

- Shareholding

- The ultimate shareholders of the Luxembourg reporting company (direct investment enterprise) are located in the United States and France.
- The American shareholder is the group head holding the ultimate control by means of its majority ownership through the subsidiaries in the Netherlands (holding) and in Belgium.
- The Luxembourg reporting company further holds a reverse investment (less than 10%) in its Belgian parent company.
- The French businessman (an individual) is a minority shareholder by way of his holding company in Luxembourg.

- Fellow enterprises

- The Bermudian, Irish and Spanish companies are fellow enterprises of the Luxembourg reporting company. The latter is in a direct investment relationship with each of its fellow enterprises on account of their respective common parent company.
- The Spanish company has in addition a portfolio investment (less than 10%) in its Luxembourg fellow enterprise.

- Participations

- The Luxembourg reporting company (direct investor) holds indirect participations in Austria, Italy, Germany and the Czech Republic through another Luxembourg holding company.
- The Austrian company is an associate entity on account of its minority investment link above 10%.
- The Italian company is out of scope vis-à-vis the Luxembourg direct investor on account of its status as a 2nd degree associate.
- The German and Czech companies are subsidiaries of the Luxembourg direct investor on account of their majority ownership links.
- The Luxembourg reporting company (direct investor) also holds a branch in Switzerland as well as direct and indirect participations in Poland, Hungary, Slovenia, Finland, the Russian Federation and China.
- The associate entity in Poland holds directly a subsidiary (holding company) in Hungary and indirectly a subsidiary in Slovenia, while both the Polish and Slovenian companies are associates vis-à-vis the Luxembourg direct investor on account of the associate status of the Polish company. The Finnish subsidiary holds an associate entity in the Russian Federation, whereas the Chinese associate is out of scope on account of its status as a 2nd degree associate.