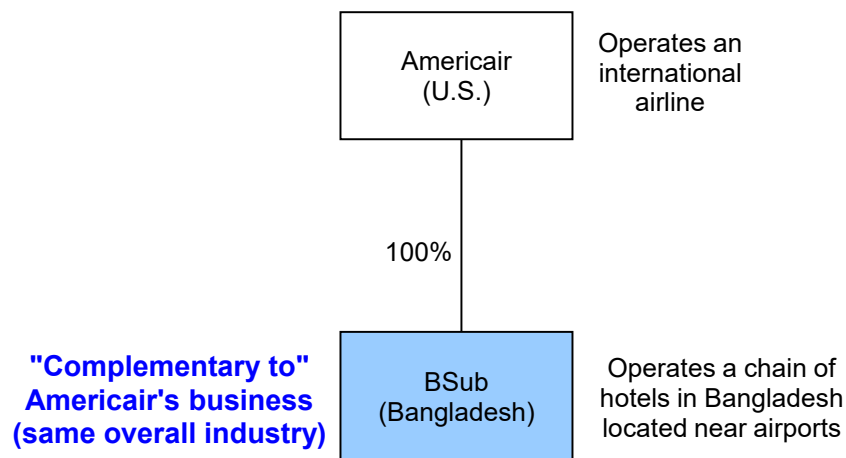


**Bangladesh Treaty (2004)
Treasury Tech. Explan.,
Article 17, Paragraph 2,
Example 3**

**Bangladesh Hotels
"Complementary to"
Airline Business**

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Limitation on benefits:

**Active trade or
business test
("derived in
connection with")**

Ameriair is a corporation resident in the United States that operates an international airline. BSub is a wholly-owned subsidiary of Ameriair resident in Bangladesh. BSub operates a chain of hotels in Bangladesh that are located near airports served by Ameriair flights. Ameriair frequently sells tour packages that include air travel to Bangladesh and lodging at BSub hotels. Although both companies are engaged in the active conduct of a trade or business, the businesses of operating a chain of hotels and operating an airline are distinct trades or businesses. Therefore BSub's business does not form a part of Ameriair's business. However, BSub's business is considered to be complementary to Ameriair's business because they are part of the same overall industry (travel) and the links between their operations tend to make them interdependent.

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