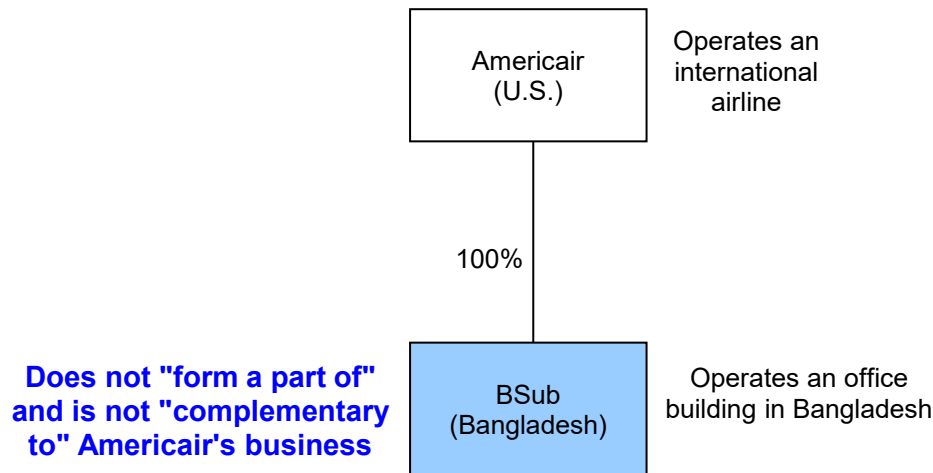


**Bangladesh Treaty (2004)  
Treasury Tech. Explan.,  
Article 17, Paragraph 2,  
Example 4**

**Bangladesh Office Building  
Not Connected With  
Airline Business**

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**Limitation on benefits:**

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

AmeriCAir is a corporation resident in the United States that operates an international airline. BSub is a wholly-owned subsidiary of AmeriCAir resident in Bangladesh. BSub owns an office building in Bangladesh. No part of AmeriCAir's business is conducted through the office building. BSub's business is not considered to form a part of or to be complementary to AmeriCAir's business. They are engaged in distinct trades or businesses in separate industries, and there is no economic dependence between the two operations.

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