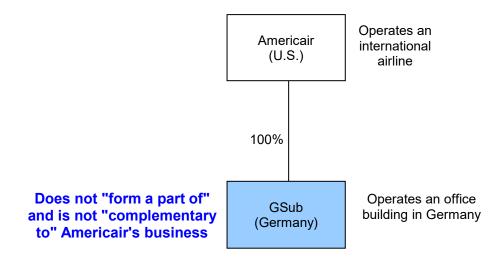
Germany Protocol (2006) Treasury Tech. Explan., Article 28, Paragraph 4, Example 4 German Office Building
Not Connected With
Airline Business

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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. GSub is a wholly-owned subsidiary of Americair resident in Germany. GSub owns an office building in the Federal Republic of Germany. No part of Americair's business is conducted through the office building. GSub'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.