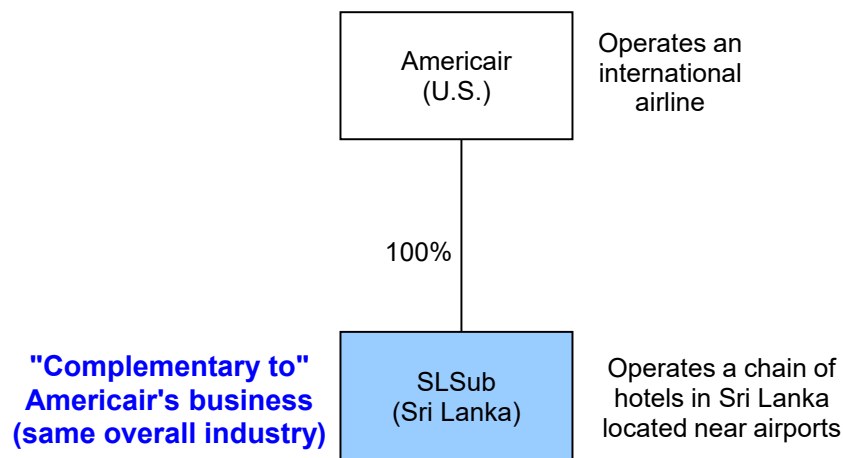


**Sri Lanka Protocol (2002)
Treasury Tech. Explan.,
Article 23, Paragraph 3,
Example 3**

**Sri Lanka 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. SLSub is a wholly-owned subsidiary of Ameriair resident in Sri Lanka. SLSub operates a chain of hotels in Sri Lanka that are located near airports served by Ameriair flights. Ameriair frequently sells tour packages that include air travel to Sri Lanka and lodging at SLSub 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 SLSub's business does not form a part of Ameriair's business. However, SLSub'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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