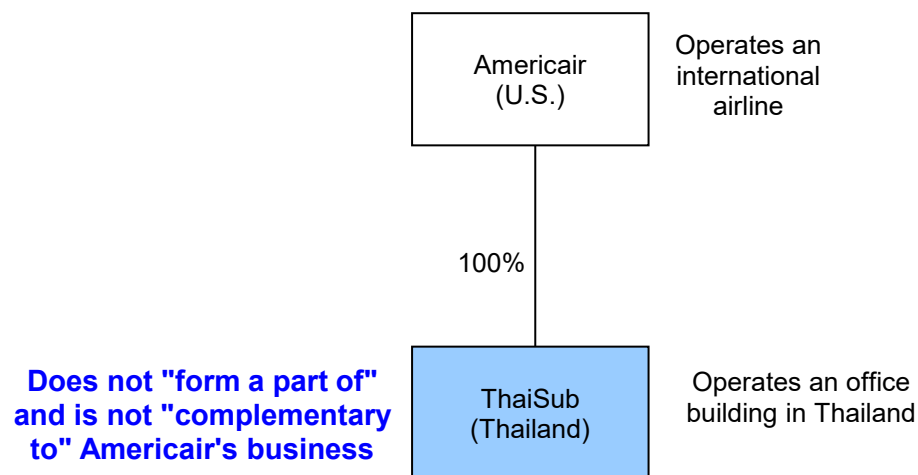


**Thailand Treaty (1996)
Treasury Tech. Explan.,
Article 18, Paragraph 2,
Example 4**

**Thai Office Building
Not Connected With
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. ThaiSub is a wholly-owned subsidiary of AmeriAir resident in Thailand. ThaiSub owns an office building in Thailand. No part of AmeriAir's business is conducted through the office building. ThaiSub's business is not considered to form a part of or to be complementary to AmeriAir'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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