

H-RXUQDO RI 7D[ 5HVHDFK YRO QR SS

%HKDYLRXUDO LQVLJKWV LQ V  
WKH OHJDO VHWWLQJV ULJKW

(PLO\ 0LOODQH

OHJDO UHJLPH IRU WD[ FROOHFWLRQ LV VWLOO ODUJHO\ IRFXVHG RQ GHEWV DIW  
WR JDUQLVKHH QRWLFHV LQWHUHVW DQG SHQDOWLHV 7KLV FRQWUDVWV ZLWK  
V\WHP WKDW HQVXUHV SD\PHQW RI DQWLFLSDWHG WD[ LQ UHDO WLPH :H GLVFX  
OLPLWV RQ %, DSSURDFKHV LQFOXGLQJ SURFHGXUDO IDLUQHVV DQG WD[SD\HU U  
WKH\ DUH VXLWDEOH IRU %, LQIOXHQFHG DSSURDFKHV )LQDOO\ ZH SURSRVH GL  
VXSSRUW HDV\ IDLU DQG WLPHO\ WD[ SD\PHQW IRU LQGLYLGXDOV DQG EXVLQHV

.H\ ZRUVG[ DGPLQLVWUDWLRQ WD[ ZLWKKROGLQJ JDUQLVKHH QRWLFHV EHKDYL

---

5HVHDFK )HOORZ 7D[ DQG 7UDQVIHU 3ROLF\ ,QVWLWXWH DQG 3K' &D  
3ROLF\ 7KH \$XVWUDOLDQ 1DWLRQDO 8QLYHUVLW\  
3URIHVVRU 8QLYHUVLW\ RI 0HOERXUQH /DZ 6FKRRO DQG )HOORZ 7D  
\$XVWUDOLDQ 1DWLRQDO 8QLYHUVLW\ 0HOERXUQH 0HOERXUQH WKDQN DQ DQRQ\PRXV  
FROOHDJXHV DQG 0U 5RELQ &KDQ IRU KHOSIXO FRPPHQWV



H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

6HFWLRQ VHWV RXW VRPH UHOHYDQW LQVLJKWV IURP %

DQG DOVR LQ UHODWLRQ WR WKH PDQDJHPHQW RI WD[ GH  
SUH H[LVWLQJ IUDPHZRUN RI UHVSQRVLYH UHJXODWLRQ

7KH \$18 \$72 %, 3URMHFW EXLOGV RQ WKH SDWK EUHDNLQ  
ZLWK WKH \$72 RQ UHVSQRVLYH UHJXODWLRQ DQG YROXQV  
6\ VWHP ,QWHJULW\ &76, ZLWK WKH \$72 RQ UHJXODWLRQ  
SUHVHQWHG D JURXQG EUHDNLQJ YLHZ RI WD[ FRPSOLDQ  
QRZ ZHOO NQRZQ S\UDPLG RI UHJXODWRU\ FRPSOLDQFH  
DW WKH EDVH RI WKH S\UDPLG WKH EDVH UHSUHVHQVW W  
WD[SD\HU 7KH  $\mu$ S\UDPLG  $\uparrow$  WDNHV WKH DSSURDFK WKDW L  
PRVW WD[SD\HUV DUH ORFDWHG DW WKH  $\mu$ FRPSOLDQW  $\uparrow$  E  
)LJXUH

(QIRUFHPHQW VWUDWHJLHV EHFRRPH SURJUHVVLYHO\ ILU  
REMHWLYH LV WR JXLGH YROXQWDU\ WD[ FRPSOLDQFH D  
UHGXFH DV IDU DV SRVVLEOH WKH QXPEHU RI SHRSOH ZH  
HQVXULQJ FROOHFWLRQ V\ VWHPV DUH HIIHFWLYH DQG QF  
:HQ]HO \$KPHG DQG %UDLWKZDLWH KDYH FKDUDFWH  
ERWWRP RI WKH S\UDPLG DV  $\mu$ GLDORJLF  $\uparrow$  ZLWK WD[ DGPL  
FKDQJH RI EHOLHIV LQ VPDOO EXVLQHVV WD[SD\HUV DER  
DQG ZKDW LW SURYLGHV WKH FRPPXQLW\ \$KPHG %UDLW

)LJ 5HJXODWRU\ 3\UDPLG

6RXUFH \$72

ORUH UHFHQW HPSLULFDO UHVHDFK E\ :XUWK DQG %UDLW  
DSSURDFK ZKLFK LPSOLHV WKDW PRVW WD[SD\HUV DUH I

---

\$ IRUHUXQQHU WR WKH 773, DQG WKH FXUUHQW SURMHFW DQG OH  
DUFKLYHG &76, PDWHULDOV DW



WKH ERWWRP FRPSULVLQJ RI WKH SRSXODWLRQ KDV  
HWKLFDOO\ DQG OHJDOO\ FRUUHFW WR VXFK DQ H[WHQW  
WKHLU UDGDU )RU WKHVH WD[ SUDFWLWLRQHUV WKHUH  
EXVLQHVV DQG EHLQJ DQ HWKLFDO SURIHVVLRQDO

7KH µDJJUHVVLYH¶ WD[ SUDFWLWLRQHU DW WKH WRS RI  
WDNLQJ GLVSRVLWLRQ ZKLFK LJQLWHV LQWHUHVW LQ  
RSSRUWXQLW\ GRPLQDWHV DQ\ VHQVH RI PRUDO REOLJDW  
WXUQ WR QHZ SDVWXUHV IRU SUDFWLVLQJ WD[ DYRLGD  
FUDFNGRZQ RI D FXUUHQW VFKHPH LV PRELOLVHG E\ WKH  
JURXS ZHUH µGLVWLQJXLVKHG E\ DQ LQFUHDVHG SURSHQ  
HWKLFV DQG H[SORLW WKH RSSRUWXQLW\ DIIRUGHG E\ DP  
:XUWK %UDLWKZDLWH S 7KH ODUJHVW SURSHQ  
DUH LQ WKH PLGGOH GHVFULEHG DV EHLQJ µDGDSWLYH¶  
GHSHQGLQJ RQ WKHLU QHWZRUNV DQG WKH RSSRUWXQLW\

7KH µFRQLQJHQR¶ JURXS DUH PRVW OLNHO\ WR EH UH  
LQWHUYHQWLRQV 7KH\ PD\ WDNH HLWKHU FDXWLRXV RU  
FOLHQW DQG WKH FLUFXPVWDQFHV DQG RSSRUWXQLWLH  
WRZDUG PRUH DJJUHVVLYH SRVLWLRQV ZKHQ WKDW DSSH  
DUH RSSRUWXQLWLHV WR GR VR DQG LW DSSHUV WR EH  
WROHUDWLQJ VXFK DQ DFWLYLW\

6LPLODU WR WKH LQLWLDO ZRUN LQ UHJXODWRU\ WKHRU  
UHFRRPHQGV UHLQLQJ LQ QRQ FRPSOLDQFH ZLWK HQIRU  
DIIHFWLQJ QRQ WDUJHWHG JURXS :XUWK %UDLWKZDLW  
WDUJHWHG HQIRUFHPHQW DFWLRQ QHHGV WR EH PDGH F  
HPEHGGHG LQ D VXLWH RI PHFKDQLVPV DERXW ZKLFK V  
QDUUDWLYH 7KLV QDUUDWLYH JHDSUHG WR GLVFRXUDJLQ  
WR EH VKDSHG E\ PDQ\ DXWKRULWLHV DQG QHWZRUNV  
JRYHUQPHQW UHYHQXH DXWKRULWLHV SURIHVVLRQDO D  
:XUWK %UDLWKZDLXH ÅWVP°UHXUWLPDWH Ñ0 7DPWK



HDV\ WR QDYLJDWH SURGXFH EHWWHU FRPSOLDQFH )RU  
FRQGXFWHG D VWXG\ RI 60(V ILQGLQJ WKDW WKH V  
SURFHVV KDG D PDMRU LPSDFW RQ FRPSOLDQW EHKDYLR

\$W WKH WLPH RI ZULWLQJ WZR 5&7V KDYH EHHQ GHVLJQ  
DV SDUW RI WKH \$18 \$72 %, 3URMHFW %LGGOH )HOV 6L  
HPUJH LV WKH LPSRUWDQFH RI VHJPHQWDWLRQ E\ W\SH  
LQWHUYHQWLRQV ZKLFK DVVLVW WD[SD\HUV WR FRPSO\  
5HYLVLHQ 7ULDO DQG WHVWHG WKH HIIHFWRU RI SHUVRQDO  
5&7 ZDV WKH (PSOR\HU 2EOLJDWLRQV 7ULDO WHVWLQJ  
JXLGHOLQH E\ ILHOG DXGLWURV DV ZHOO DV WKH HIIHFWRU  
VFUDSD\Q%G DEW GHVGH DXGLWURV 07KH (PSOR\HU 2EOLJDV  
WKH WUHDWPHQWV OHG WR LPSURYHPHQW μLQGLFDWLQJ  
OLNH VLPSOLILFDWLRQ DQG WKH SURYLVLHQ RI KHOS ZLV  
VFKHG\XOH↑ %LGGOH )HOV 6LQQLQJ S

0FHHRDQD P DQJHFFO OLNHU UKHOG P DQJHFFO

,QWHUYHQWLRQV VKRXOG EXLOG WUXVW

7UXVW LQ WKH WD[ V\WHP DQG OHJLWLPDF\ RI WKH \$72  
DQG WD[ DGPLQLVWUDWLRQ PRUH JHQHUDOO\ %UDLWKZD

ZKHQ WD[ DXWKRULWLHV DQG WD[SD\HUV KDYH D  
FRPPXQLFDWHV PXWXDO UHVSHFW OR\DOW\ DQG FR  
SURFHVV WKH LQGLYLGXDO WDNHV RQ WKH SHUVRQ  
GHPRFUDWLF SURFHVV DQG DFFHSWV UHVSRQVLELOL  
JRRG 7KH V\WHP SULRULWL]HV SURPRWLRQ RI WUX  
DERYH D VHQVH RI IHDU %UDLWKZDLWH :HQ]HO

,QWHUYHQWLRQV ZKLFK PDNH SD\LQJ HDV\ DQG IRVWHU  
DERXW WD[ SD\PHQW VKRXOG EH SULRULWL]HG ,W LV LP  
FRQWDLQ WKH SRWHQWLDO IRU LOOLEHUDOLW\ WKDW QXG  
S \$FFHSWLQJ WKH SRWHQWLDO EXW DOVR WKH OLPL  
PRVW YDOXDEOH FRQWULEXWLRQ RI H[SHULPHQWDO VWXO

OLHV LQ SURYLGLQJ DQ LQFUHPHQWDO KLJKO\ FRQ  
QHZ OHJDO DQG SROLF\ LQLWLDWLYHV LQWHQG  
H[SHULPHQWLQJ ZLWK VPDOO LQWHUYHQWLRQV ZK  
VWXGLHG LQ RUGHU WR LGHQWLI\ ZKHWHU WKH\ F  
VLWXDWLRQV <HXQJ S



H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

OLWHUDWXUH VXJJHVWV WKDW PDQ\ LQWHUYHQWLRQV ED  
QRW FRQVFLRXVO\ SHUFHLYHG E\ WKRVH ZKRVH EHKDYLR  
OH[LFRQ RI QXGJH WKLV ZRXOG EH MXVWLILHG IRU JR  
SDWHUQDOLVP¶ ZKHUH FLWL]HQV UHPDLQ IUHH WR PDNH

,Q D UHFHQW UHYLHZ WKH ,QVSHFWRU \*HQHUDO RI 7D[DW  
UHJDUGLQJ WKH VWDWXV RI WKH 7D[SD\HUV¶ &KDUWHU  
JLYHQ ULVH WR D ODFN RI VWDNHKROGHU FRQILGHQFH LQ

LW KDV EHHQ QRWHG WKDW RQ WKH RQH KDQG WK  
SXUSRUWLQJ WR VHW RXW µWD[SD\HUV¶ ULJKWV¶ ZI  
OLWLJDWLRQ VSHFLILFDOO\ DJDLQVW WKH FRQIHUUD  
GRFXPHQW ,\*7 S

7KH \$72 KDV VWDWHG WR WKH ,\*7 WKDW LWV DSSURDFK  
SDUWLFXODUO\ XQGHU LWV 5HLQYHQWLRQ SURJUDP JRH  
UHODWLRQVKLS ZLWK WD[SD\HUV DQG WKHLU UHSUHVHQV  
UDWKHU WKDQ DIIRUGLQJ ULJKWV¶ ,\*7 S 7R WK  
,\*7 UHFRPPHQGHG WKDW WKH &KDUWHU EH XSGDWHG WR  
5HLQYHQWLRQ SURJUDP JRLQJ RQ WR VD\ WKDW µWKH \$  
35HLQYHQWLRQ¶ DQG VXFK KLJKHU VWDQGDUGV VKRXOG  
IXQGDPHQWDO GRFXPHQW VXFK DV WKH &KDUWHU¶ S  
&KDUWHU DQG WKH \$72¶V UHVSQRVLYH UHJXODWLRQ PRG  
FOHDU SHUFHSWLRQ LQ VRFLHW\ WKDW WKH \$72 LV H[HUF  
FLWLQJ \*DQJO +RIPDQQ .LUFKOHU

\*LYHQ WKH \$72¶V SRVLWLRQ LQ UHVSHFW RI WKH 5HLQY  
PRGL\ SD\PHQW DSSURDFKHV QHHG WR ILW ZLWKLQ WKH  
FRPPLWPHQWV 7KHVH FRPPLWPHQWV LQFOXGH

PDNLQJ LW DV HDV\ DV SRVVLEOH IRU WD[SD\HUV WR  
XQGHUVWDQGLQJ DQG FRQVLGHULQJ WD[SD\HUV¶ FLU  
GLIIHUHQWLDWHG VHUylfH

WUHDWLQJ DOO SHRSOH ZLWK UHVSHFW DQG GLJQLW  
EXLOGLQJ WUXVWHG UHODWLRQVKLSV

EHLQJ SUDJPDWLF DQG IDLU LQ LWV GHFLVLRQ PDNLQ

JLYLQJ WKH ULJKW DQVZHUV DW WKH ULJKW WLPH D

XVLQJ LWV VNLOOV DQG H[SHUWLPH WR DVVLVW WD[S

7KH ILUVW IRXUWK DQG VHYHQWK RI WKHVH FRPPLWPH  
SXUSRVHV RI %, LQWHUYHQWLRQV LQ WD[ SD\PHQW V\VWH

\* 7\$; 3\$<0(17 6<67(06

\$XVWUDOLD¶V WD[ V\VWHP LV ODUJHO\ EDVHG RQ VHOI DV  
HQIRUFHPHQW V\VWHPV ,Q WKH \$72 FROOHFWHG \$  
\$8' ELOOLRQ RYHU WKH SUHYLRXV \HDU EXW \$8'  
DPRXQW H[SHFWHG DW WKH WLPH RI WKH %XGJHW  
RSHUDWLQJ H[SHQVH EXGJHW LQ RI \$8' ELOOLR  
HPSOR\HHV 7KH \$72 UHSRUWV WKDW LWV DYHUDJH FRVW  
LV FHQWV DQG LW LV UHFRJQLVHG LQWHUQDWLRQDO

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

:KLOH WKH PDMRULW\ RI WD[SD\HUV SD\ WKHLU WD[ RQ W

FRQWUJRO GHEW FROOHFWLRQ VWUDWHJ\ LV SUHPLVHG R  
WKDW DQ DJHLQJ GHEW EHFRPHV PRUH GLIILFXOW WR FRO  
RU FRQWULEXWH WR GHOD\ LQ WKH FROOHFWLRQ RI D GH  
RI ULVN

\* ,QWHUHVW RQ HDUO\ DQG ODWH SD\PHQW RI WD[

7KH \$72 KDV D UHJLPH RI LQWHUHVW IRU VKRUWIDOOV X  
,QWHUHVW &KDUJH 6,& XQSDLG WD[ WKH \*HQHUDO ,Q  
SD\PHQWV RI WD[ 7KH REMHFW RI WKH 6,& LV WR QHXWU  
RWKHUZZLVH UHFHLYH IURP VKRUWIDOOV RI WD[ VR WKDW  
IRUP RI D IUHH ORDQ UHODWLYH WR WKRVH WD[SD\HUV ZK  
% ,W DSSOLHV WR VKRUWIDOOV RI LQFRPH WD[ SHW  
FRQFHVVLRQDO FRQWULEXWLRQV WD[ 'LYLVLRQ WD[ R  
ZKHQ WKH &RPPLVVLRQHU DPHQGV D WD[SD\HU V DVVHV

7KH \*,& RQ XQSDLG LQFRPH WD[ LV FDOFXODWHG IURP ZK  
IURP ZKHQ D WD[ DVVHVPHQW[ LSWPHQWVHQW \$FKH  
\*,& UHJLPH ZDV VWUHDPOLQH LQ /LNH WKH 6,& LW  
PRVW WD[HV LQFOXGLQJ LQFRPH WD[ )%7 DQG \*67 DV Z

7DEOH \*HQHUDO ,QWHUHVW &KDUJH \*,& DQG 6KRUWID  
VHDFK

4XDUWHU	*,& DQ UDWH	*,& GDLO	UDWH 6,&	DQQXDO UDWH 6,&
\$SULO ± -XQH				
-DQXDU\ ODUFK	±			

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

7DEOH ,QWHUHVW RQ (DUO\ 3D\PHQWV 2YHUSD\PHQWV

3HULRG ,QWHUHVW UDWI SD

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

WD[ GHEWV 7\$\$ 3DUW ,,% VV \$\$=\$ WR \$\$=1 7KH \$72  
DOORFDWLRQ RI 5%\$V LV VWDWHG LQ 36 /\$ ZKLO  
RIIVHWWLQJ RI UHIXQGV DQG FUHGLWV DJDLQVW WD[DWLF  
GHDOV ZLWK UHIXQGV RI 5%\$ EDODQFHV DQG VXUSOXVHV

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

VWUDWD WLWOHV SURSHU\ WUXVWV PDQDJHG LQ  
IXQGV

D WUXVWHH IRU D QXPEHU RI WUXVWV RU

\$Q DUUDQJHPHQW IRU D SD\PHQW SODQ GRHV QRW YDU\ V  
DQG SD\DEOH \$FFRUGLQJO\ DQ\ \*,& RU RWKHU UHOHYD  
XQSDLG DPRXQW RI WKH OLDELWLW\ EHJLQV WR DFFUXH

\$ GHFLVLRQ WR HQWHU LQWR DQ DUUDQJHPHQW WR DFFH  
LQ DFFRUGDQFH ZLWK 36 /\$ DQG ZLOO EH GHWHUP  
JXLGHOLQHV LQ 36 /\$ μ,QVROYHQF\ ± FROOHFWLRQ  
IRU HQWLWLHV XQGHU H[WHUQDO DGPLQLVWUDWLRQ ,C  
SODQV WKDW H[WHQG RYHU D ORQJHU SHULRG WKDQ WK  
8VXDOO\ RQH \HDU EXW XS WR WZR \HDUV LV WKH DFFH  
XS IURQW SD\PHQW RI D VXEVWDQWLDO SDUW RI WKH WD  
WKH H[WHQW RI WKH WD[SD\HU↑V FDSDFLW\ WR GR VR 36

,W LV WKH WD[ GHEWRU↑V UHVSQRVLELWLW\ WR GHPRQV  
GXH GDWH ,Q PDNLQJ WKH DSSOLFDWLRQ IRU DQ LQVWDO  
&RPPLVVLRQHU ZLWK DOO QHFHVVDU\ LQIRUPDWLRQ ZLW  
DJUHHG ZLWK WKH &RPPLVVLRQHU IDLOLQJ ZKLFK HQIF  
UHODWHG OLDELWLW\ PD\ EH FRPPHQFHG ZLWKRXW IXUWK

7KH \$72 LV XQOLNHO\ WR DJUHH WR D SD\PHQW SODQ ZK  
IDLOLQJ WR ORGJH SD\ RU PHHWLQJ SUHYLRXV SD\PHQW  
PD\ DOVR UHTXLUH VHFUXLW\ DV D SUHFRQGLWLRQ WR V  
FLUFXPVWDQFHV RI WKH WD[SD\HU ZLOO EH FRQVLGHUHG  
SURSRVHG WR EH WDNHQ E\ WKH WD[SD\HU WR PLWLJDM  
FRQVLGHU WKH WD[SD\HU↑V SDVW EHKDYLRXU DQG UHDF  
36 /\$ > @ 7KH IDFWRUV WR EH WDNHQ LQWR DFF  
DFFHSW SD\PHQW E\ LQVWDOPHQWV LQFOXGH EXW DUH Q  
E\ WKH WD[SD\HU WKH WD[SD\HU↑V FXUUHQW ILQDQFLDO  
3D\PHQW E\ LQVWDOPHQWV ZLOO QRW EH DFFHSWHG LI SU  
ZRXOG EH GLPLQLVKHG RU WKH UHYHQXH ZRXOG EH GLVD

,I WKH &RPPLVVLRQHU GHFLGHV WR DFFHSW SD\PHQW E\  
DGYLVHG LQ ZULWLQJ RI WKH GHWDLOV RI WKH SD\PHQW  
RI WKH OLNHO\ FRQVHTXHGFHV LI WKH\ IDLO WR SD\ D\  
\$UUDQJHPHQWV WR DFFHSW SD\PHQW RI D GHEW E\ LQV  
LPSRVHG E\ OHJLVODWLRQ DSSOLHV IURP WKH RULJLQDO  
FRQWLQXH WR DFFUXH ZKLOH WKH GHEW UHPDLQV RXWV  
SURLGHG ZLWK DQ LQGLFDWLRQ RI WKH OLNHO\ TXDQW  
SD\ XQGHU WKH DUUDQJHPHQW 36 /\$ > @

,I WKH WD[ GHEWRU IDLOV WR PHHW D WHUP RI DQ\ DJUH  
OLNHO\ WR FRPPHQFH UHFRYHU\ SURFHGHGLQJV WKHUHD  
DFNQRZOHGJH WKH GHEW DQG LI OHJDO SURFHGHGLQJV  
FRPPHQFH FRQVHQW WR WKH &RPPLVVLRQHU EHLQJ JUD  
GHIDXOW LQ SD\PHQW 7KH SD\PHQW SODQ FDQ DOVR E  
LQIRUPDWLRQ DV SURYLGHG WR WKH &RPPLVVLRQHU LQ  
GHEWRU↑V FLUFXPVWDQFHV VXEVWDQWLDOO\ FKDQJH RU  
RQJRLQJ WD[ REOLJDWLRQV DV WR ORGJHPHQW DQG SD\PH

3D\PHQW SODQV FDQ EH GUDZQ XS RQOLQH DQ RSWLRQ D  
ZLWK GHEWV RI \$8' RU OHVV 7KH \$72 KDV IRXQG W  
HIIHFWLYH IURP D EHKDYLRXUDO SHUVSHFWLYH WKH



H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

EXVLQHVV WD[ GHEWRUV WKDW DUH HLWKHU LQFDSDEOH  
ZLWKLQ D UHODWLYHO\ VKRUW WLPHIUDPH RU DUH VHULD  
7KHUH DUH WKUHH HVVHQWLDO HOHPHQWV WR ULVN HYDQ

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

• 7+,5' 3\$57< :,7++2/!,1\*

7D[ FROOHFWLRQ LV VXEVDQWLDOO\ VWUHQJWKHQHG  
FROOHFWLQJ DQG SURYLGLQJ LQIRUPDWLRQ RU LQ ZLWKK  
SDUWLHV PD\ EH LQYROYHG LQ WD[ FROOHFWLRQ HLWKH

6 3D\PHQW WR HPSOR\HH

\$Q HQWLW\ PXVW ZLWKKROG DQ DPRXQW IURP VDODU  
RU DOORZDQFHV LW SD\V WR DQ LQGLYLGXDO DV D  
DQRWKHU HQWLW\

7KH 3\$<\* UHJLPH GRHV QRW UHPRYH WKH HPSOR\HH REO  
ODZ IROORZLQJ DQ DVVHVVPHQW WKH WD[ RZHG LV UHFF  
SDLG E\ ZLWK ~~QRW GIDG LQGLYLGXDO~~ ~~QRW GIDG LQGLYLGXDO~~ RQ RQ WKH HPSO  
ZLWKKROG DQG UHPLW WR WKH \$72 ZLWK DFFRPSDQ\LQJ  
REOLJDWLRQV 7KH HIIHFWLYHQHV RI WKH 3\$<\* UHJLPH  
WR WKH HPSOR\HU 7KLV KDV PDQ\ HIILFLHQFLHV +RZHY  
LQFOXGH ZKHUH WKH HPSOR\HU LV QRW RWKHUZLVH YLVL  
HPSOR\HU UHJLVWUDWLRQ VHWWLQJ IRU H[DPSOH IRU S  
DQG FOHDQHUV (YHQ FDK SD\PHQWV E\ TXLWH ODUJH  
DJULFXOWXUDO RU FRQVWUXFWLRQ EXVLQHVVHV PD\ EH  
LV WKH FKDUDFWHULVDWLRQ RI ZRUNHUV DV FRWUDFWR  
μFDVK† DQG GLJLWDO HFRQRP\

1RQHWKHOHV WKH 3\$<\* ZLWKKROGLQJ REOLJDWLRQ KDV  
LW ZDV LQWURGXFHG )RU H[DPSOH WKH \$XVWUDOLDQ 3\$  
ZKLFK RSHUDWH DV LQWHUPHGLDULHV EHWZHHQ WKH EXV  
WKH LQGLYLGXDO GRLQJ WKH ZRUN

6 3D\PHQW XQGHU ODERXU KLUH DUUDQJHPHQW

\$Q HQWLW\ WKDW FDUULHV RQ DQ HQWHUSULV  
D SD\PHQW WKDW LW PDNHV WR DQ LQGLYLGXDO LQ  
HQWHUSULVH LI

D WKH HQWHUSULVH LV D EXVLQHVV RI DUUDQJL  
VHUYLFHV GLUHFWO\ IRU FOLHQWV RI WKH HQWLW\  
RI WKDW NLQG WKDW LV QRW PHUHO\ LQFLGHQWDO W



F WKH LW\ DQG WKH LQGLYLGXDO DUH SDUWLHV W  
DJUHHPHQW LV LQ WKH DSSURYHG IRUP DQG VWD  
SD\PHQWV XQGHU WKH DUUDQJHPHQW PHQWLRQH L  
RI VXFK DUUDQJHPHQWV WKDW LQFOXGHV WKDW DU

G WKH LQGLYLGXDO KDV DQ \$%1 WKDW LV LQ IR  
DJUHHPHQW «

(DFK SDUW\ PXVW NHHS D FRS\ RI WKH YROXQWD  
PDGH XQWLO \HDUV DIWHU WKH PDNLQJ RI WKH C  
DJUHHPHQW >VXEMHFW WR D SHQDOW\@ «

\$ SDUW\ WR WKH YROXQWDU\ DJUHHPHQW PD\ W  
QRWLI\LQJ WKH RWKHU SDUW\ LQ ZULWLQJ

,W LV DQ LQWHUHVWLQJ TXHVWLRQ ZKHWHU DQ HQWLW\  
ZRXOG ZLOOLQJO\ DJUHH WR VXFK DQ DUUDQJHPHQW DV  
WR ZLWKKROG SD\ DQG NHHS GRFXPHQDWLRQ LQ UHVS  
DQG ZKLFK GR QRW UHODWH WR LWV RZQ WD[ REOLJDWL  
PDQ\ YROXQWDU\ 3\$<\* DUUDQJHPHQWV DUH LQ SODFH KR  
KRZ HIIHFWLYH WKHVH DUH

• \*DUQLVKPHQW

\$V ZDV QRWHG LQ VHFWRQ WKH &RPPLVVLRQHUV JDU  
QHJDWLYH SXEOLFLW\ UHFHQWO\ DQG LWV XVH LV EHLQJ  
SRZHU LV EURDGO\ GUDIWHG DQG GRHV QRW UHO\ RQ WK  
RUGHU

6 &RPPLVVLRQHUV PD\ FROOHFW DPRXQWV IURP V  
\$PRXQW UHFRYHUDEOH XQGHU WKLV 6XEGLYLVLRQ

7KLV 6XEGLYLVLRQ DSSOLHV LI DQ\ RI WKH IROC  
SD\DEOH WR WKH &RPPRQZHDOWK E\ DQ HQWLW\ W  
GHEW KDV EHFRPH GXH DQG SD\DEOH

D DQ DPRXQW RI D WD[ UHODWHG OLDELWLW\

E D MXGJPHQW GHEW IRU D WD[ UHODWHG OLDELW

F FRVWV IRU VXFK D MXGJPHQW GHEW

G DQ DPRXQW WKDW D FRXUW KDV RUGHUHG WKH G  
IROORZLQROLV RXGD VL RKLFWL IR



H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

· ([WHQG 3\$<\* ZLWKKROGLQJ V\ VWHPV

3\$<\* WR FRYHU RWKHU WD[ OLDELWLHV

\$V VHW RXW LQ VHFWRQ WD[SD\HUV FDQ DQG PD\ EH  
RI DQWLFLSDWHG WD[ XQGHU WKH 3\$<\* LQVWDOPHQW V\  
ZLWKKHOG E\ DQRWKHU SDUW\ VXFK DV WKURXJK ZDJH Z  
3UHVHQWO\ 3\$<\* DSSOLHV WR LQFRPH WD[ RI EXVLQHV







H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

FRQWUDVW LQ \$XVWUDOLD WKH WD[SD\HU PXVW FDOFXOD  
WKH WD[ UHWXUQ DIWHU WKH IDFW RU ZULWH WR WKH \$  
SD\PHQWV LV DVVHVVDDEOH DQG GHGXFWELEOH IRU XQGHU  
:H LGHQWLI\ VRPH SRWHQWLDO VLPLODULWLHV DQG GLI  
SURYLVLRQV DQG LQWHUHVU UXOHV DQG D SRVVLEOH 7D

7DEOH <RXU 7D[ \$FFRXQW &RPSDUHG WR 5XQQLQJ %DO

	5%\$	<RXU 7D[ \$FFRXQW] DO	
3D\PHQWV	<RX FDQ PDNH	DRSDFDQWDRSRPHQW LQW	
	WD[ DFFRXQW DQ\ W	PH] DFFRXQW DQ\ WLPH	





H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

\$XVWUDOLDQ %URDGFDVWLQJ &RUSRUDWLRQ )\$%& &RUQHUSVPRQJU  
\$SULO DYDLOKDEOBV DZZ DEF QHW DX FRUQHUV PRQJUHO EX  
DFFHVVHG -DQXDU\

\$XVWUDOLDQ 7D[DWLRQ 2\$17FH&R\$72RUDWH SOBQOEHUUD  
KWWSV ZZZ DWR JRY DX XSORDGHG)LOHV &RQWHQW &5 GRZQO  
BQ BMV BZ SGI

\$XVWUDOLDQ 7D[DWLRQSHZQYFIQW\$72 WKH \$72 &3DQFHUJDPDEO H5KLG  
KWWSV ZZZ DWR JRY DX XSORDGHG)LOHV &RQWHQW &5 GRZQO  
SGI

\$XVWUDOLDQ 7D[DWLRQ 2IILFHQXDS72RURHUVWQ F°OS of 1QV

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

%LGGOH 1 )HOV . 6LQQQLQJ 0 μ%HKDYLRXUDO LQVLJKWV D  
UDQGRPLJHG FRQWUROOHG WULDOV¶ 7D[ DQG 7UDQVIHU 3ROLF  
OD\

%RYHQV / μ7KH HWKLFV RI QXGJH¶ LQ3UH+GH+D+QHRIFK7QJHD  
\$SSURDFKHV IURP SKLORVRSK\ 6\$RURRIFUFVRDUGGJISFKFKRSSRJA\

%UDLWKZDLWH 9 :HQ]HO 0 μ,QWHJUDWLQJ H[SODQDWLRQV  
\$ HGH &DPEULGJH +DQGERRN RI SV\FKR&DPEULGHH\$QRPULVLE  
3UHVV &DPEULGJH SS

%URZQ 6 7D\ORU . 3ULFH 6 : μ'HEW DQG GLVWUHV (YDOX  
-RXUQDO RI (FRQRPLFO3QRFKR\$SJA\

&KDSPDQ % μ&RQFHSWXDO LVVXHV DQG WKH \$XVWUDOLDQ H  
IRU KLJKHU 7GHXFDWLRQ¶FRXUQDQR SS

&KDSPDQ % 5\DQ & μ,QFRPH FRQWLQJHQW ILQDQFLQJ RI V  
\$VVHVVLQJ WKH \$XVWUDOLDQKLRXUQDWRQ¶GXRWLRSS

&KDSPDQ % +LJJLQV 7 6,WRPLHWFRQWLQJHQW ORDQV 7KHRUV  
SURVSHVWUDYH ODFPLOODQ /WG 1HZ <RUN

&KHQ . %HQGOH 1 6RPDQ ' μ3ROLF\ E\ GHVLJQ 7KH GD  
JRYHUQPHQW¶ 5RWPDQ 6FKRRO RI ODQDJHPHQW UHVHDFK UHS

&RPPLWWHH RQ +LJKHU (GXFDWLRQ )XGHSSRJJWRQ WKH:LRPPEWDMH  
+LJKHU (GXFDWLRQ)XGHSSRJJWRQ

\*DQJO . +RIPDQQ ( .LUFKOHU ( μ7D[ DXWKRULWLHV¶ LQW  
RI FRPSOLDQFH LQ VRFLDO GHVWDELOLWYRUKRQSSUXVW¶

\*DQJO . 7RUJOHU % .LUFKOHU ( +RIPDQQ ( μ(IHFWV R  
(YLGHQFH IURP D ILHOG (FRSHPHQWWRDQXVWRDLD¶SS

+DOOVZRUK 0 /LVW - 0HWFDOIH 5 9ODHY , μ7KH EHKDY  
ILHOG H[SHULPHQWV WR +RXUQDQFHWRDQXVWRDLD¶SS

+DXVPDQ ' :HOFK % μ'HEDWH -RXUQDQFHWRDQXVWRDLD¶SS

+0 5HYHQXH DQG &XVWRPV +05& μ+RZ WR LPSURYH +05&¶V F  
/RQGRQ -XO\

+ROJLQJHU / \$ %LGGOH 1 μ%HKDYLRXUDO LQVLJKWV RI W  
FRQFHSWXDO DQG HPSLUDQDQ7DQVRFK3RVL\ ,QVWLWXWH :RU  
2FWREHU

+RRG & μ%ULWLVK WD[ VWUXFWXUH GHRORSHFRQDHW DGPL  
QR SS

H-RXUQDO RI 7D[ 5HVHDFK

%HKDYLRXUDO LQVLJ

,QVSHFWRU \*HQHUDO R'HEMDFRORQF,WZLRQ \$ UHSRUWGRHWKH \$VVL  
-XO\

,QVSHFWRU \*HQHUDO RI 5BYDWZRIQQW,R7 WKH 7D[SD\HUV† &KDUWF  
SURWHFWGRQV 'HFHPEHU

-DPHV 6 μ7D[DWLRQ DQG QX+DQGEFRNR\$EWRDQLRXHDO HFRG  
VPDUW GHFLVLRQ PDNLQJ 5DWLRQDO GHFLVLRQDNDJUZLWK  
&KHOWHQKDP 8. DQG 1RUWKDPSWRQ 0\$ SS

.DKQHPDQ 7KLQNLQJ IDWDFPQGDORZ1HZ <RUN

.OLFN - 0LWFKHOO \* μ\*RYHUQPHQW UHJXODWLRQ RI LUUD  
ONQRHVQW DWDZRGHYDZRDXDSSU € °ò• ñ #Q™—•™—` X P RQRQ

/DPEHUWRQ & 'H 1HYH - ( 1RUWRQ 0 , μ7KH SRZHU RI YRLF  
WD[SD\HU SUHIHUHQFHV LGRXUDDOVR IW&RFRPPHODDQFFHQRJ\  
SS

/DZ&RXQFLO RI \$XVWUDOLD 6XEPLVVLRQ WR WKH ,QVSHFWRU  
XVH RI JDUQLVKHH QRWLFHV -XQH

/HH 3 & &KHQ & 0 &KRX & + μ'HFUHDVLQJ WD[ FROOHFWRU  
FROODERUDWLYH EHKDYLQDQV RI 3XELSDH\$G†QLVWVLDWLRQ 5HV  
QR SS

/HHFK & μ'HWHFW DQG GHWHU RU FDWFK DQG UHOHDVH \$U  
SHQDOLVH GHOLEHUDWH WD[ HYDGHUV"† 7D[ DQG 7UDQVIHU 3R

/HYL 0 2I UXOH DQG 3QHYHQW\ RI &DOLIRUQLD 3UHV V %HUNHOH

/RGJH 0 :HJULFK . μ7KH UDWLRQDOLW\ SDUDGR[ RI QXGJH  
ZRUOG RI ERXQG/DG DQWLRQDOLW\QDOVLS\$ PL@@ GHZH ERQPC

0XUSK\ . 7\OHU 7 5 &XUWL V \$ μ1XUWXULQJ UHJXODWRU  
HIIHFWLYH ZKHQ SHRSOH TXHVWVHR&ODKHLRQJLQVPOFHECQWQ  
SS

2QX ' 2DWV / μ³3D\LQJ WD[ LV SDUW RI OLIH' 6RFLDO C  
FRPPXQLFDWLRQV† DWRU\ FR-À† L H@RI 3XIDHLFV R•LVLRXUH

