

# BreMiNo Group

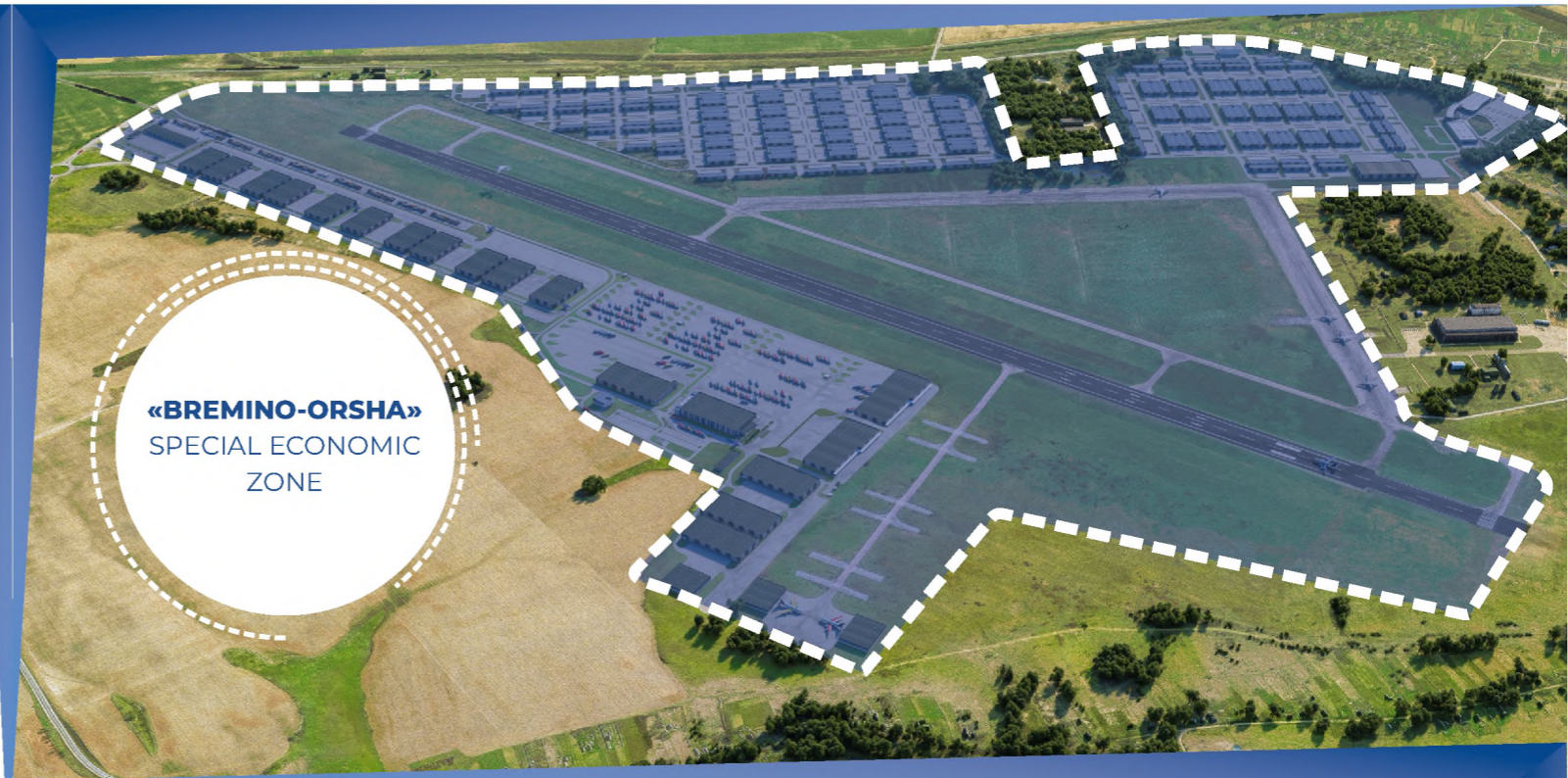
## BREMINO ORSHA SPECIAL ECONOMIC ZONE



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### BreMiNo Group SPECIAL ECONOMIC ZONE **BREMINO-ORSHA** SPECIAL LEGAL REGIME

<b>Basic document</b>	Decree of the President of the Republic of Belarus “On the establishing of Special Economic Zone “Bremino-Orsha”
<b>Duration of legal regime</b>	50 years
<b>Managing company</b>	Bremino Group Limited Liability Company
<b>Amount of investment</b>	<ul style="list-style-type: none"> <li>• No less than 5 mln USD;</li> <li>• No less than 500 000 USD;</li> <li>- during 3 years</li> </ul> or - within realization of Research&Development program;
<b>Advantages of location</b>	<ul style="list-style-type: none"> <li>• International airfield "Orsha";</li> <li>• International railway line;</li> <li>• Cross over of E30/E95 highways;</li> <li>• Proximity to the border of the Russian Federation.</li> </ul>
<b>Inspection bodies and departments</b>	<ul style="list-style-type: none"> <li>• Customs clearance office (24/7 working hours);</li> <li>• Phytosanitary and veterinary services;</li> <li>• Bank, insurance and customs brokers department.</li> </ul>



**Customs preferences**

- Customs free zone procedure benefits;
- The goods under Customs free zone are not required to follow the National system attestation standards;
- 0% value-added tax for following positions:
  - Equipment, components, spare parts, raw materials and goods imported for an investment project;
  - Imported vehicles under custom codes 8704, 8705, 8709, 8716 and sub position 870120 10 - for 5 years;
  - Imported aircrafts and railway rolling stock that are not manufactured in the Republic of Belarus;
  - Commodities that were manufactured from goods of foreign origin (under free economic zone procedure) and transferred for domestic consumption procedure.
- 0% customs duties for following positions:
  - Equipment, components, spare parts, raw materials and goods imported for an investment project;
  - Export outside EAEU of the goods that were manufactured from goods of foreign origin.



**Tax exemptions**

- 0% income tax during 9 years;
- 0% real estate tax during 20 years;
- Full deduction of VAT during facilities construction and equipping;
- 0% VAT until January 1, 2033 when selling or leasing the real estate property to residents;
- 0% Income tax, tax on dividends and equal income during 5 years, when the profit is declared (for founders of resident companies and joint enterprises);
- 0% tax on dividends and equal income, when the profit is declared (for joint enterprises that get accrual from managing company) until January 1, 2033;
- 5% Royalty tax until January 1, 2028;
- 0% offshore tax when profit, dividends and equal income are transferred to owners;
- for the purpose of income tax assessment exchange rate differences are not included in the non-operating income and expenses until January 1, 2033.



**Preferences for land regulation**

- Land lease up to 99 years;
- Contract lease rate;
- Possibility of land plot sub-lease;
- Possibility of entrusting the leasing rights to the banks for pledging;
- No prior approval of the plot location is required;
- Plot passport is not required.



**Exemptions in building legislation**

- Regulations on Procurement of goods and services are not applied;
- Prices and tariffs for goods and services in the sphere of construction are not regulated;
- National System verification is not required;
- Certificate of compliance for realization of contractor's functions is not required;
- Exemption from compensation of agricultural and forestry production losses;
- It is allowed to place objects which basic sizes of sanitary protection zones exceed the local established parameters;
- Pre-investments / pre-project documentation is not required;
- It is allowed to carry out construction simultaneously with the development, examination and approval of project documentation for the next phase of the project;
- Investment objects can be the object of the deals before state registration and before the emergence of rights on them.



**Exemptions in currency regulation**

- Legislation requirements of foreign economic activity do not cover:
  - terms and ways of foreign economic operation completion;
  - contracts with reference to goods imported without crossing the border of the Republic of Belarus;
- Right to open accounts in foreign banks without permission of the National Bank of the Republic of Belarus;
- Right to purchase currency without restriction of its usage.



**Migration and labour benefits**

- Exemption from fees for the issuance / renewal of special working permits for foreign citizens and persons without citizenship;
- Visa-free entry to the territory of the Republic of Belarus for citizens of 80 countries;
- Flexibility of labor regulation.



**Other benefits**

- Preservation of legal regime (tax legislation) up to January 1st, 2028.
- Electronic document management;
- Requirements to the primary accounting documents and financial statements are not applied;
- Free price determination;
- Quotes for imported and exported goods/services, manufacturing quote, sailing quotes and other quantitative restrictions for manufacturing and delivering of goods/services are not applied;
- Simplified procedure of advertising on the territory of "Bremino - Orsha" special economic zone.