



## CANADA-MEXICO INCOME TAX TREATY

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A bilateral income tax treaty has been in effect between Canada and Mexico since July 17, 1992. Like the U.S.-Mexico Tax Treaty, the Canada-Mexico Tax Treaty provides for avoidance of double taxation, reduction of income taxes applied to foreign residents, and the exchange of information between government authorities to avoid tax fraud.

The Canada-Mexico Tax Treaty is virtually identical to the U.S.-Mexico Tax Treaty, except for the following differences:

## A. DIVIDENDS

While the U.S.-Mexico Tax Treaty reduces U.S. taxes on dividends to a rate of 5% or 10% (see above), the rate between Canada and Mexico will be 10% or 15%.

## **B. INTEREST**

Canada and Mexico have agreed that the highest tax rate on interest income earned by non-residents will be 15%. Under the U.S.-Mexico Tax Treaty, the tax rates are 4.9%, 10% and 15% depending on the type of loan.

However, according to the Most-Favored-Nation Provision of the Canada-Mexico Tax Treaty, if either Country includes a lower tax rate on interest in a tax treaty concluded with another country, that tax rate will apply to the Canada-Mexico Tax Treaty, but under no circumstances shall the rate be lower than 10%. Consequently, when the U.S.-Mexico Tax Treaty is ratified, the same tax rates on interest will apply between Canada and Mexico, except that 10% will be the lowest tax rate--versus 4.9% (see Canada-Mexico Tax Treaty, Protocol).

## C. ROYALTIES

The Canada-Mexico Tax Treaty's maximum tax rate for royalties earned by foreign residents is 15%. The U.S.-Mexico Tax Treaty will apply a maximum 10% rate. However, the Protocol described in the preceding paragraph will also apply to royalties, thereby reducing the rate to 10% when the U.S.-Mexico Tax Treaty is ratified.





## D. DISPUTE SETTLEMENT

The "Mutual Agreement Procedure" of the Canada-Mexico Treaty is identical to that of the U.S.-Mexico Tax Treaty, except that Canada and Mexico did not provide for binding arbitration.

## E. OTHER PROVISIONS

In addition to the foregoing differences, the U.S.-Mexico Tax Treaty has a series of provisions that are not included in the Canada-Mexico Tax Treaty, such as rules regarding the taxation of branches, alimony and child support, and exempt organizations.

#### 4. STRENGTHS

These Corporate Agencies and their Directors, must develop a strong efficiency and administrative structure dedicated to payroll services, Sales Promotions Marketing Services for National massive consumption Leader Brands O.T.C. (Over the Counter) products and much more.

They must maintain an accurate performance and achieve every experience in a documental and demonstrable practical pilot planning of hundreds of activities and projects for Marketing, Retail Services and Trade Marketing Areas, Below the Line activities, wherever subcontracting all kinds of services and general diverse suppliers, with eventual Points of Sale personnel, Supervision, Models, Sales Representatives, Regional Managers, National Directors and office clerical staff and all Executive levels.

They have to be able to command sustained campaigns for several consecutive years for important Corporations, increasing the Companies revenues and the products sales volumes influencing directly the target consumers, achieving great product rotation and in shelf health, bringing down also personnel rotation indexes, reducing sensitively training costs, desertions, contingencies and labor liabilities, in order to be considered as the top 10 and business-best. Their main strength must be being very motivated individuals, results oriented, natural coaches and organized leaders, ambitious, enthusiastic, because every operation shut down means no money on the pocket. The Agencies and their Directors must be resourceful self-starters, sales hunters. They have to be used to work with pressure and taking care of details, give direct follow-up to priorities, customer oriented and always orienting customer needs.

Being honest must not be just an ethical issue or a commercial promise; it must be a veridical and really demonstrable issue. Even commercial always, being ethical with good moral values is a must in every respectable staff. The individuals must be intelligent, highly articulated, possesses mature, ideally must have polished presence; they have to be used to work with high-level industry related contacts and capable of commanding respect. From General Managers to Division Directors and up, they must be dynamic, creative & enthusiastic, 'out of the box' thinkers, able to propose different ways to detonate the results that the clients need.





They have to be resilient. They will of course need an imperative ability to overcome objections, up to challenge of transforming staid established company policies to realize improvements seeking better performance and global results.

Both internally so externally they must be inspiring, collaborative, positive team leader, Good listeners, persistent, savvy, thoughtful problem solvers, open-minded assessors of needs and ideas. They must manage multiple priorities and meet deadlines. As expected they must be disciplined and Institutional must develop strong relationships with colleagues, subordinates, chief executives and every people in the Customer structure and in their own company.

## WEAKNESSES

The main weaknesses of these agencies can be found in the management and taxes administration, because if they don't cover the normal expenses with a low rate of accounts working or even having an important number of accounts working, if they are from eventual or little periods of time, they wont be able to maintain direct and fixed costs of their infrastructure. The weakness then will be to try to use the taxes money to cover the fixed costs, starting a difficult and unsustainable run of administration. They will have to makeup the accountability and then the registrees trying to simulate profit instead of losses to obtain bank credits and so forth, to obtain resources to keep the agency alive for more time expecting to find and gain a new account that let the agency upturn the obtained results.

Other identified weaknesses are lack of adequate staff people, the reduced possibility to offer good salaries, making payments of lower salaries and low fees while a big account comes, so in that moment can offer a better situation for the clue employees.

This generates enormous rotation for the Human Resources department. The lack of experimented and trained executives generates as well an expensive budget to invest in for different courses and specific trainings for the insipient, unconsistent and uncoherent sales force that can't be retained for long term basis.

These unadequate staff teams lack of creative, innovative ideas, concepts to creat and add value to the clients needs and impede the collaboration across the organization to meet prospect client needs. Obviously other weaknesses are derived from the lack of ability to resolve complex issues, identify sales process solutions keeping a little agency in the status of just executer, instead of assessors.

Its main weakness is the almost impossible ability to turn organization onto new paths to success, due to the fast-paced work environment. Executives are not problem solvers, neither decision-maker so customers must explain everything at least twice to be organizational aligned, they don't have effective communicators. Even offering the best rates possible to keep maintaining the customers satisfied, they cant handle multiple brands and even if they could theres always the exclusiveity caluses.

It is very difficult to work, maintain a critic mass of accounts and grow without analytical approaches, strategic planning and financial acumen due to short period promotions that impede to plan with anticipation. Agencies additional weakness is the





lack of abilities to communicate both oral and written with both internal and external audiences.

## REVENUES & PROFITS

The revenues can be very convenient even for a starting agency, just requesting that the beginner agency has ambition for its own business, clear decision for offering value to his customers and committed to do the right effort to achieve both. Agencies have different services from which they can obtain profits and generate interesting revenues. Some of them can be, just listing but not limitating, the following:

- Additional fees,
- Anticipated payment,
- Banquets,
- Call centers,
- Concierge services,
- Contests,
- · Co-packing,
- Courses & Trainings,
- Delivery,
- Electronic Assets,
- Fee over fees,
- Financing,
- Integration,
- Labor.
- Natural Fee,
- Other,
- P.O.P. design,
- P.O.P. distribution,
- People Number,
- Promotional Warehousing,
- Seminars,
- Supervision,
- Taxes,
- Time-period &
- Uniforms.

Doesn't matter the specialty of event or promotion the way to quote is simple and considering the Mexican market, the possibility to make a good business is huge but the required investment to have a stablished structure being also huge, makes this sector a highly monopolized and risky one if they cant maintain the adequate promotional business volume. Mainly you have to maintain a minimum volume of people, multiplicate it by the numer of days you will need to execute the promotion, by profile. Once you have that initial part, you have to add the proper taxes.

You have to identify the uniform and equipment, tools and any materials those people will need; the supervision and controls you have to apply to the main workers. Then you have to consider the kind of bonuses or economical incentives they will receive in case they achieve the required goals, in order to maintain them motivated.





You have then to consider the kind of executives and staff required to control the activity, if they will need to make daily supervision, weekly, if they will have to travel, to make national or international trips to maintain the adequate operational standards, you have to consider if the people is going to have some training and what kind.

How many days, where, what are they going to eat, if they are going to be in their own city or if they will also have to travel, where are they going to stay, which hotels are adequate, if you are going to need an infocus, vhs or business center facilities and so forth everything they will need and the promotion will require monthly, quarterly or year round in order to offer your customer just one single data... the yearly budget with its complete forecast. Then that amount will just be divided into 12 months, equally portioned and then to a 15 days invoice amount.

Let's use a simple example, with a Junior Brand & little group in 4 month period basis:

COST CONCEPT	DAILY COST	UNITS		
(DEFINE)	(OR UNITARY COST)	(PEOPLE-PIECES)	DAYS	\$ TOTAL
SALESMAN MERCHANDISER PROMOTOR PUSHGIRL SUPERVISOR IT AUXILIAR SECRETARY PM AUXILIAR MANAGER DIRECTOR INCENTIVES SUBTOTAL (A) TAXES % TAXES \$	\$30 \$25 \$40 \$70 \$50 \$100 \$200 \$350 \$500 \$650 \$2015 38.9% \$784	30 30 30 30 30 4 1 1 1 1 20	120 120 120 120 120 120 120 120 120 120	\$108,000 \$90,000 \$144,000 \$252,000 \$180,000 \$12,000 \$24,000 \$42,000 \$60,000 \$78,000 \$80,000 \$1,070,000 38.9% \$416,230
SUB-TOTAL (B)  UNIFORM LAPTOP PC MOBILE PHONE BLACKBERRY HANDHELD PROMOTIONAL ITEMS SAMPLING MATERIAL SUB-TOTAL (C)	\$2799 \$250 \$600 \$350 \$150 \$225 \$175 \$1 \$20	260 4 3 7 2 1 1200 120	1 1 1 1 1 1 120 120	\$1,486,230 \$65,000 \$2,400 \$1,050 \$1,050 \$450 \$175 \$144,000 \$288,000 \$502,125
TRAINING BUSINESS CENTER SERVICES BANQUET (BREAKFAST-LUNCH) PRINTED MATERIALS PRIZES HOTEL AIRPLANES TAXIS BUSES LOCAL HELP SUB-TOTAL (D)	\$2500 \$500 \$70 \$15 \$110 \$55 \$580 \$100 \$225 \$35	1 1 150 150 1 1 10 10 10	1 1 1 1 1 1 1 1	\$2,500 \$500 \$10,500 \$2,250 \$110 \$55 \$5,800 \$1,000 \$2,250 \$3,150 \$28,115
PERIODICAL REPORTS MANAGER SUPERVISION TRIP SUB-TOTAL (E) TOTAL AGENCY FEE	\$5 \$750 15%	4 1	120 4	\$2,400 \$3,000 \$5,400 \$2,021,870 \$303,280.5





FINAL TOTAL			\$2,325,150.5
I.V.A. TAX	15%		\$348,772.58
SPECIAL DISCOUNT			\$0
GRAND TOTAL			\$2,673,923.08

BUSINESS CASE
BUDGET FORMATS AND STRATEGIC INFORMATION
THE CLUE FOR GREAT CONTRIBUTIONS EVEN IN COMPROMISE REVENUES

First I would like to represent the easiest way to make a budget for any customer, in terms of a simple promotion promotion:

# **GENERAL CONDITIONS:**

PLAN: CHRISTMAS SALE

PERIOD: 1 MONTH

PLACE: DEPARTMENTAL STORES

PROMOTION: SEXY SANTAS SELLING PERFUMES

PERSONEL: 10

TYPE: PUSHGIRLS SUPPORT MATERIALS: UNIFORMS INCENTIVES: NONE

**GENERAL COSTS:** 

INTEGRATED SALARY COST: \$100.00 X 10 PUSHGIRLS X 30 DAYS = \$30,000.00





UNIFORMS: PROPORTIONED BY CLIENT

AGENCY FEE: 20% = \$6,000.00

TOTAL COST BEFORE TAXES: \$36,000.00

1.V.A. TAX: 15% = \$5,400.00

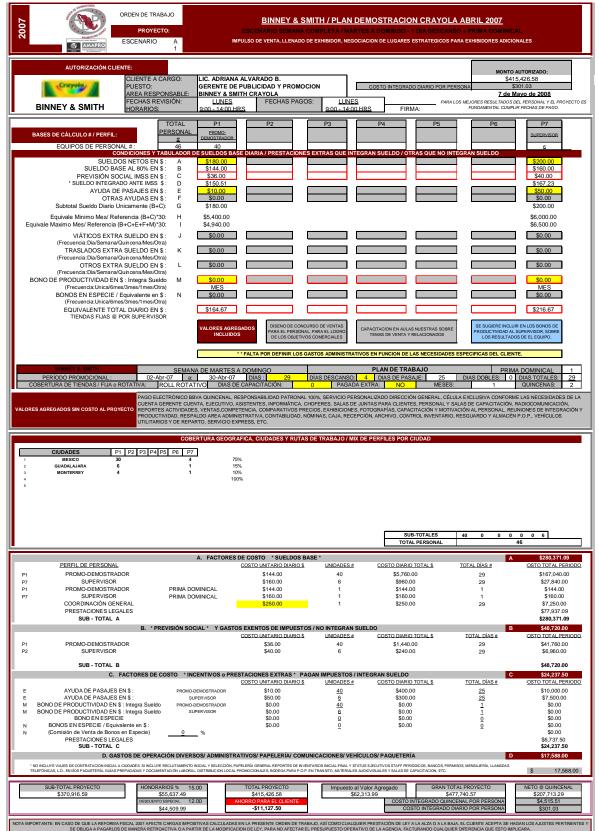
TOTAL EXPENSE: \$41,400.00

As seen in the previous exercise it is very simple to make a quotation for any customer. But whenever is needed any additional information about the specific promotion, that simple sheet is not going to be useful because it has many hidden information or lets say has lack of information. Depending on the type of customer we are working with, the transparency is needed fully or sometimes the client is not expert on the subject. This situation makes all the agencies willing to sell as needed. That promotes to have a non-standardized system that will be able to sell whatever kind of clientele we caught. But with big clients things run different. That's a huge difference. Those big transnational clients always ask for the price accuracy in order to have potential discounts year after year.

In other way, trying to have an independent system for selling will help at the beginning, but while time goes by, the difficulties start when you find no coherency between prices you offer to one customer in one company and then whe the same customer makes a professional move from a Company to another, you will be pressed to charge for the same service the same price; whe you roll some of your employees, lets say operations managers for a normal development plan or because from natural cuases they leave the agency, then you find that theres was no specific control of the main conditions offered to one client versus another and so forth.







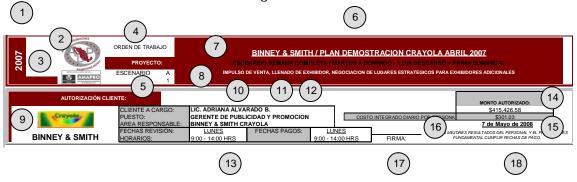




The main objective of this formats I have created and have been permanently upgrading since 1992 and until past August 2007, was to give transparency to the customer of the investments they were going to make with us as a promotions agency and internally to maintain an accurate control of the different expense costs we were committed to make, from labor to different assets management.

In a practical sense, these formats pretend to explain the whole concept of operations in just one sheet. Many of my past clients appreciated when they finally understood the easy steps the format had, but some prefer even as amazing and incredible as it appears, to use the traditional first lecture I shared with you.

Let's describe each of the different stages and sections this format has:



## **GENERAL INFORMATION:**

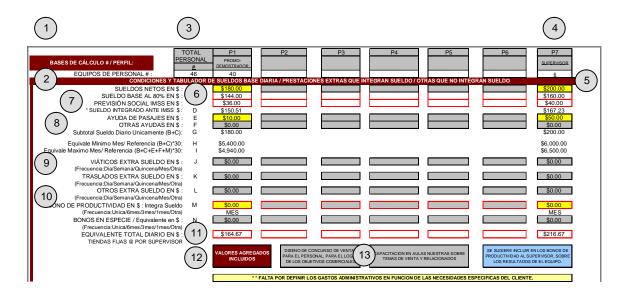
- 1. YEAR OF OPERATION
- 2. AGENCY'S BRANDING IMAGE
- 3. AGENCY'S AFFILIATION TO "AMAPRO"
- 4. PROOF OF PURCHASE NUMBER
- 5. PROJECT VERSION & SCENARIO NUMBER
- 6. GENERAL TITLE: COMPANY & PLAN
- 7. SPECIFIC ADMINISTRATIVE BRIEF DESCRIPTION OF THE PROPOSED SCENARIO
- 8. SPECIFIC OPERATIONAL DESCRIPTION OF THE PROJECT

## **AUTHORIZATIONS INFORMATION:**

- 9. CUSTOMER'S BRANDING IMAGE
- 10. CUSTOMER'S IN CHARGE OF THE BUDGET
- 11. POSITION
- 12. ADSCRPTION AREA
- 13. INVOICE RECEIVING & PAYMENT DATES AND TIMES
- 14. AUTHORIZED GLOBAL AMOUNT BUDGET
- 15. PERSONAL AVERAGE DAILY COST
- 16. AUTHORIZATION DATE
- 17. CUSTOMERS SIGNATURE
- 18. OPPORTUNITY PAYMENT RECOMMENDATION







## **GENERAL INFORMATION:**

- 1. CALCULUS BASIS
- 2. PERSONAL TEAMS
- 3. PERSONAL TOTAL NUMBER
- 4. DIFFERENT PROFILES 1 7
- GENERAL CONDITIONS STAGE, SALARY & BENEFITS
- NET WAGE
- 7. SOCIAL SECURITY TAXES
- 8. ADDITIONAL AUTHORIZED EXPENSES
- 9. TRIP EXPENSES
- 10. INCENTIVES AND BONUSES
- 11. TOTAL DAILY WAGE
- 12. ADDED VALUE SERVICES
- 13. TRAINING AND INCENTIVES

The main objective has always been to pamper the Client and all the customers giving the necessary information to take quick and easy decisions. This kind of formats have always resulted as time releasers for our customers and have proven its efficiency year after year with special global customers I have got as Mattel Toys, Kodak, Pond´s, Unilever, Chicolastic, Loreal, Nivea, Bimbo, Coca Cola, Philips and many more, when in their annual summary tests and audits we have demonstrated that we could have a great one-sheet-tool to help them find every specific detail of any promotion.

It is very important to have as a general context that with some of these mentioned Clients I have had constant renewals working for them up to 10 years consecutively.