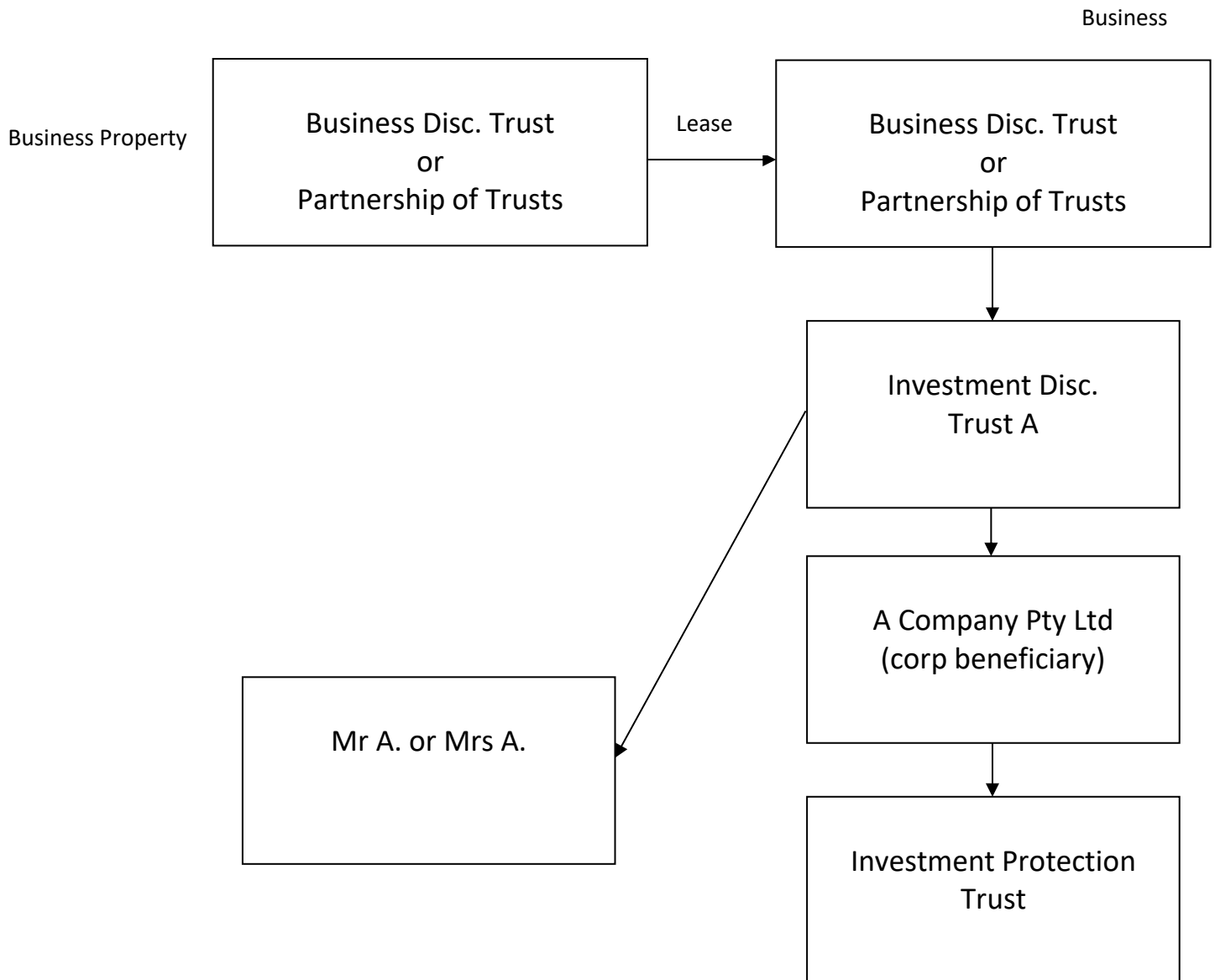


## RESTRUCTURING- PART 5: SEPARATION OF ASSETS IN BUSINESS STRUCTURES



1. Business property trust has business assets separated from business risks of business.
2. Business discretionary trust if one family. Business partnership of trusts if two or more.
3. Sale or rollover of business under Div. 152, Small business CGT relief of business discretionary trust or business partnership of trusts (for each trust) if required, but not superannuation contribution to \$500,000 unless sends 20% or greater of income and capital if any in disposal of business year (test year) sent to Mr A, or Mrs A.
4. Losses and income can be transferred between all discretionary trusts under the loss trust provisions where appropriate family trust elections made.

5. Investment Protection Trust owns A Company P/L so that income channelled to the corporate beneficiary doesn't increase wealth of Mr A & Mrs A i.e. provides asset protection.