# Christa's instructions for step 1

### FlyByU Group group structure

**Christa Elsaesser**
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Hi there,

You need to especially put your eye on the structure of the group, particularly on the fact that FlyByU Group holds its Belgian subsidiaries via a US intermediary holding company. Go to PwC's Worldwide Tax Summaries and do a quick research on the withholding tax rates on dividends between Belgium and the US, the US and Switzerland as well as Belgium and Switzerland. Also look into the residual withholding tax rates on dividend payments based on the respective double tax treaties ("DTT"), i.e. DTT between Belgium and USA, DTT between Switzerland and the US and the DTT between Belgium and Switzerland to make sure that the information provided on Worldwide Tax Summaries is correct.

I hope this helps.

Best,
Christa