

Real Estate Divestiture Scheme Comparison Chart

	Continued Ownership of Real Estate Loss of Corporate Value	Capital Gains Taxation In Connection with Divestiture	Real Estate Value Discount at Separation	Value Contribution	Notes Need to Secure Additional Capital for Alcoholic Beverages Business Growth?
Tax-Qualified Spin-Off of Real Estate Holding Corporation	No 👍 (from complete separation)	No 👍 (from tax-qualified spin-off)	No 👍 👍 (if there is sufficient growth potential)	👍 4x	Necessary (However, borrowing capacity can be increased by placing interest-bearing debt in spun-off entity)
Complete Sale of Individual Properties	No 👍 (from complete separation)	Yes 👎	No 👍 👍 (if cash flow is stable)	👍 2x	Unnecessary (Proceeds from real estate sales can be used to fund alcoholic beverages business growth)
Real Estate Holding Corporation Capital Increase with Partial Sale or Transfer of Control	Yes 👎 (from some continued ownership)	Yes 👎	Limited 👍 (limited investor base)	👎 1x	Unnecessary (Proceeds from real estate sales can be used to fund alcoholic beverages business growth)
Real Estate Holding Corporation Capital Increase without Transfer of Control		No 👍	Yes 👎 👎 (fewer investors can invest in minority interest)	👎 2x	