

 ${\tt SCIENTIFIC} \cdot {\tt LEGAL} \cdot {\tt NETWORK}$

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Presented to the Information Workshop and Networking Reception on R&D Incentives for the Aerospace Industry

AIAC Pacific

November 6, 2014



- Overview
- Stonecracker Scientific Legal Network
 - First and only R&D tax credit lawyers, aerospace/defence/security (A/D/S) client base
- SR&ED (Scientific Research and Experimental Development) Program Overview
 - \$5B+ annual R&D incentive, one of largest and most generous tax credits on planet
 - 25+ year history, recent extensive policy/enforcement review -- major program changes
- IRB/ITB (Industrial and Regional Benefits / Industrial Technology Benefits) Program Overview
 - Canadian industrial offsets in-a-nutshell



R&D Shift™

- Leverages Dyson's and Jenkins' reports on R&D funding and resulting policy changes
- R&D Shift™ program allows A/D/S primes/sub-primes to leverage SME's and combine SR&ED's with IRB's as competitive business tools to: immediately boost earnings/balance sheets, get 2.3X SR&ED benefits, and 9-18X+ IRB offsets on cash value of transactions
- For A/D/S primes, R&D Shift™ can potentially lower bid-prep costs, post-contract award program-delivery costs, and in-service-support. Finally, a profitable way to leverage SME's.
- For SME's, R&D Shift™ is life-changing. Finally, a path to unprecedented IP and capital raising.
- For Economic Development bodies, R&D ShiftTM offers game-changing transformation of the entire economy. Finally, a practical way to activate high-grow firms to allow $S \rightarrow M \rightarrow L$



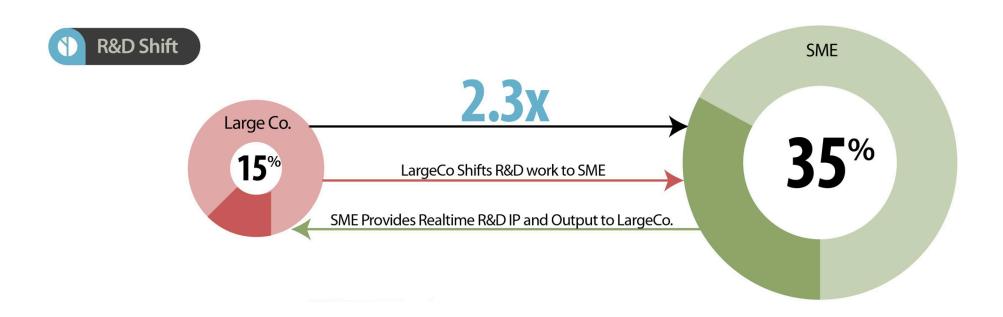
Federal SR&ED Tax Credit Rates



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R&D ShiftTM — How Primes, Sub-Primes and SME's Can Boost Profits and Achieve 2.3X SR&ED's and 9-18X+ IRB's





LargeCo Benefits

- Large Co. Owns IP
- Receives realtime R&D IP and output from SME
- Leverages SME agility and innovation
- Receives 2.3X amount of SR&ED work effort
- Dramatically improves EBITDA and Balance Sheet
- Gains SME partner without M&A liabilities
- Can receive recurring income stream from SME

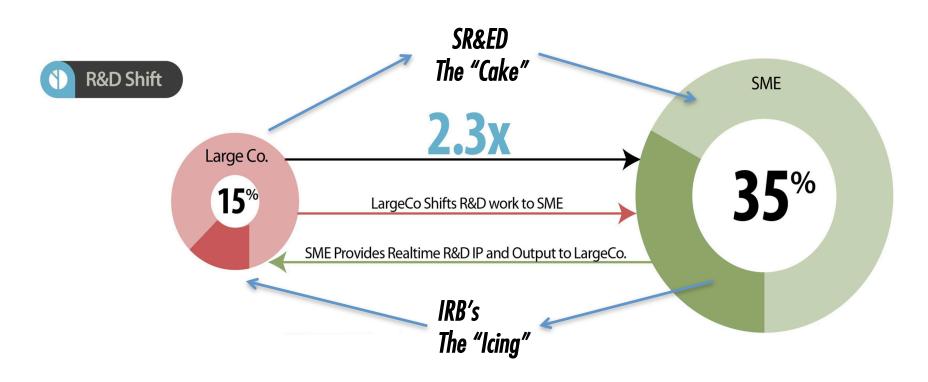
Large Co. Foreign Co.

SME Benefits

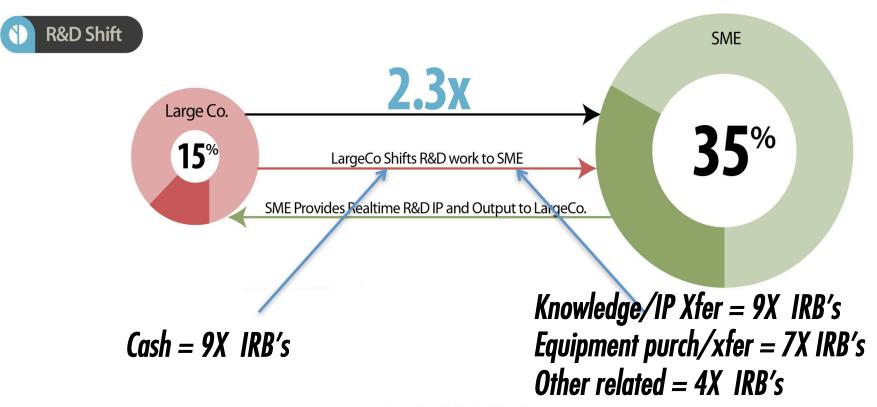
- Receives major funding from LargeCo
- Receives high-rate cash-refundable SR&ED
- Shares resulting IP with LargeCo.
- May share in LargeCo's revenue stream
- Receives Knowledge Transfer from LargeCo
- May co-brand newly-developed IP with LargeCo
- Receives funding without M&A risk
- Improves agility and innovative capabilities
- May create new products and revenue streams

SME









Canada | United Kingdom



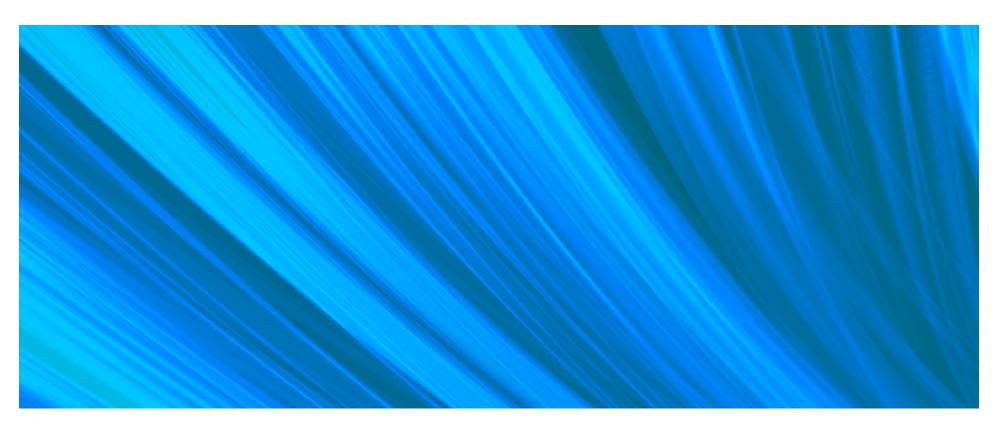
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