



Decoding Tax Policy & Macro Uncertainty for Consumer Investors

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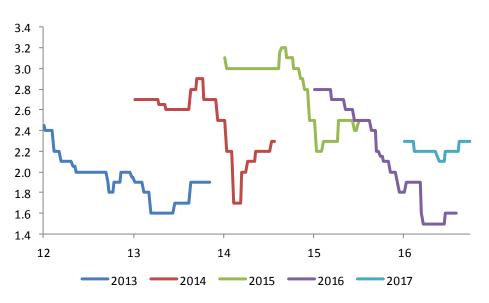
March 2, 2017



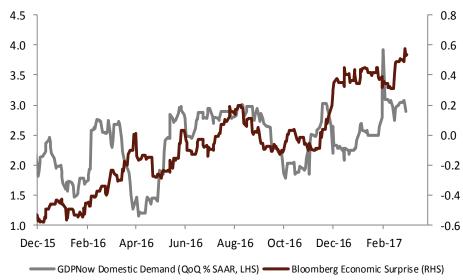
Time to revise up 2017 growth

Recovery of downward revisions ending?

Bloomberg Consensus US GDP forecast (%)



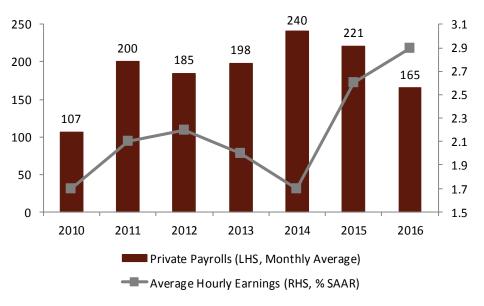
Data surprises and growth beating consensus



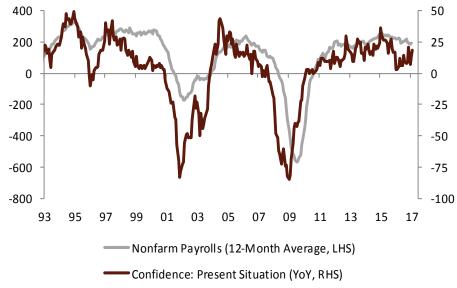


Payrolls: Solid employment

Payroll growth slows, but wages pick-up



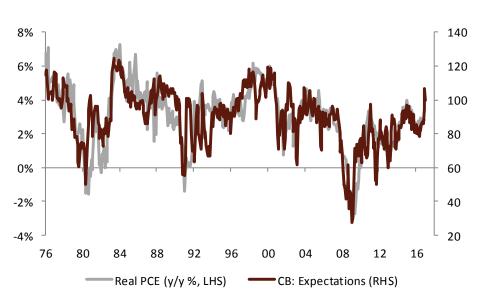
Confidence consistent with 150K per month



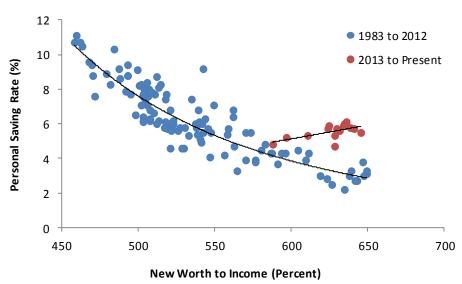


Consumption: Hope to reality?

Sentiment points to spending surge



Savings rate needs to decline (percent)



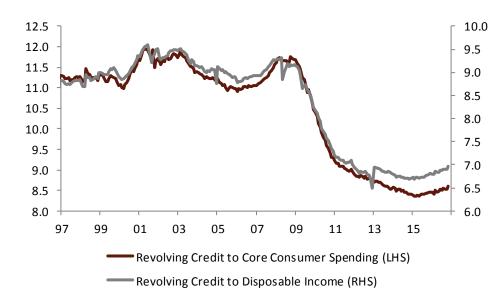


Consumption: Room to lever-up

Healthy balance sheets

140 13.5 13.0 130 12.5 120 110 12.0 11.5 100 90 11.0 80 10.5 70 10.0 80 82 84 86 88 90 92 94 96 98 00 02 04 06 08 10 12 14 16 Debt to income ratio (LHS) Debt service ratio (RHS)

Credit cards yet to really be tapped



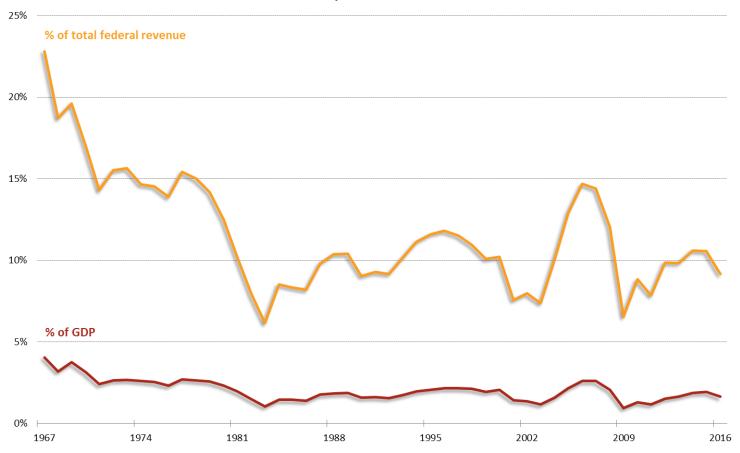


Corporate taxation

Country	% total taxation		Q	% GDP	
Canada		9.8		3.1	
Germany		4.7		1.7	
Japan		12.9		4.3	
United Kingdom		7.0		2.3	
United States		7.4		1.9	







Source: OECD



Key Elements of Business Tax Systems

	US Corporate Income Tax	Territorial Corporate Income Tax	A Modern Corporate Tax
Sales Revenue	Taxable	Taxable	Taxable (if domestic source; not if foreign)
Current expense	Deductible	Deductrible	Deductible (if domestic source; not if foreign)
Interest expense	Deductible	Deductible	Deductible (if domestic source; not if foreign)
Borrowing	Ignored	Ignored	Taxable (if domestic source; not if foreign)
Capital investment	Deductible per depreciation schedule	Deductible per depreciation schedule	Immediately deductible if from domestic sources; otherwise ignored
Inventory investment	Ignored until goods sold	Ignored until goods sold	Immediately deductible if from domestic; otherwise ignored
Active foreign-source income	Taxable when repatriated, per foreign tax credit	Ignored	Ignored
Passive foreign-source income	Taxable	Taxable	Ignored



Border Destination Cash Flow Taxation Illustrations

		Business 1	Business 2	Business 3
		All Domestic	Foreign Inputs, Domestic Sales	Domestic Inputs, Foreign Sales
20% income tax	Revenue	\$100	\$100	\$100
No border adjustment	cogs	60	60	60
	Taxable income/profits	40	40	40
	Tax	8	8	8
	After-tax income	32	32	32
20% income tax	Revenue	\$100	\$100	\$100
Border adjusted	cogs	60	60	60
N ()	Taxable income/profits	40	100	-60
Not currency adjusted	Tax	8	20	-12
	After-tax income	32	20	52
20% income tax	Revenue	\$100	\$100	\$80
Border adjusted	cogs	60	48	60
Common and discolar	Taxable income/profits	40	100	-60
Currency adjusted	Tax	8	20	-12
	After-tax income	32	32	32



	% of products imported / % inputs int'l sourced	% sales US (% profit)	% cash outside the US	% BRICM Exposure
Avon	Nothing is produced in the US	0%	All, but none designated reinvestment	30% Brazil, 7% Mexico, 11% Russia, <1% China (but seeking strategic partner)
Brown Forman	Single-point producer for largest brand (JD) in Lynchburg, TN	~50%	~80%	10% Mexico; 2% Russia; 1% Brazil; 2% China
Church	~95% products sourced & produced domestically	~80%	~80% permanently reinvested outside the US	3% Brazil, 1% Mexico
Colgate	N/A	~25%	~96%	12% Brazil; 7% Mexico; 6% China; 3% India, 2% Russia
Clorox	Most products made/sourced locally. Brita (3% of sales) has significant supply chain outside US.	~85%	Most, but could keep abroad for reinvestment	1% Mexico, minimal China, 0% in Brazil, Russia, India
Coty	N/A	30%	N/A	4% China; 2% Russia; 2% Mexico, 2% Brazil, 1% India
Dr Pepper	Minimal imports; do source apple juice concentrate, raw sugar and apple puree abroad	~90%	\$51m, repatriated periodically to US except WC needs	5% Mexico (otherwise int'l is largely Caribbean & Canada)
Estee	40% US sales sourced outside but net exporter (US ships elsewhere)	~40%	Most	BRIC + Mex = 13% (Mex 1%) + travel retail for these mkts
Herbalife	<15% imported	~20%	40%; immaterial % designated for foreign re-investment	BRIC 30%, Mexico 10%
Kimberly	N/A	~45%	N/A	2% China, 3% Russia, 5% Brazil, 7% Mexico
Coke	"Vast majority" made or sourced outside US	~50%	90%+	Mexico 4%; China 4%; Brazil 2%; Russia 1.5%; India 1%
Monster	N/A	75%	~55%. Do not intend/foresee a need to repatriate undistributed earnings	4% Mexico; China = new market, India about to open
Nu Skin	N/A	~15%	\$70m held for indefinite reinvestment	25% China; 1% Russia
Newell	50% of US sales sourced outside	~60%	50%+	\$300m sales in each of Brazil & Mexico, the rest immaterial
Pepsico	Likely not more than 10% (undisclosed)	~60% (70% profit)	90%+	4% Russia; 5% Mexico; 1% China; 2% Brazil; 1% India
Procter	15% imported (5% net); 5% inputs int'l sourced razor handles; Metamucil, FemCare (Canada)	~50%	\$11bn, not designated	35% EM exposure all in (we est 7% Mexico, 4% Russia, 4% Brazil, 2% China, 1% India)



Please email all questions to

sales@renmac.com

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