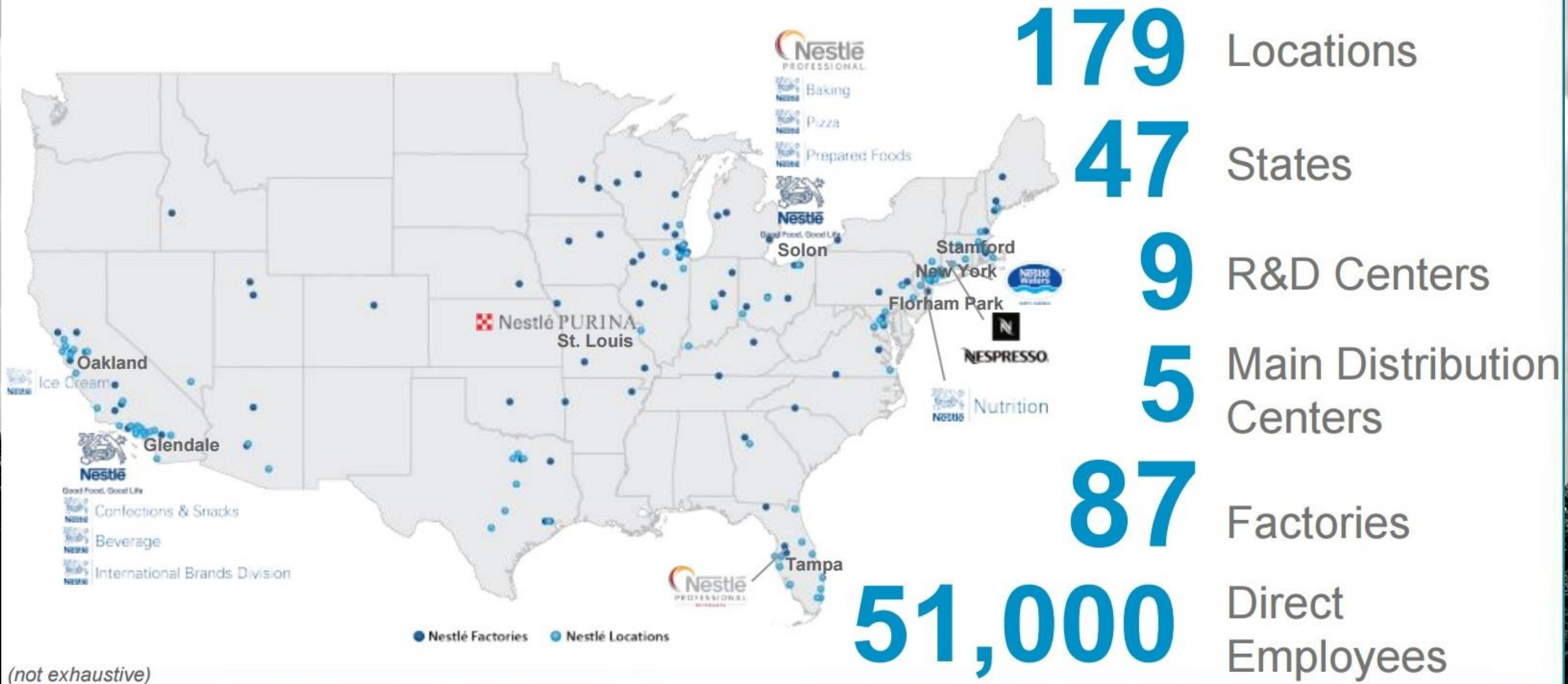




We are FDI

What we do

Educate | Advocate | Connect



Nestle is a fully-scaled operation

Nestle Is a household name

97 %

- Number of U.S. homes consume Nestle products

78 m

- Number of homes bought 4 + brands in last 52 weeks

29.9 bn

- Nestle consumer units sold each year in the USA

quality products for the entire family

(not exhaustive)

BABY

TEEN

ADULT

FAMILY



HEALTH
NEEDS

PETS

BREAKFAST

SNACKING

LUNCH

DINNER

OUT
OF HOME



The State of FDI in America

6,100,00

Number of Americans who work for an insourcing company.

0
33%

Wage premium insourcing workers earn over economy-wide average.

23%

Percentage of U.S. exports produced by insourcing companies.

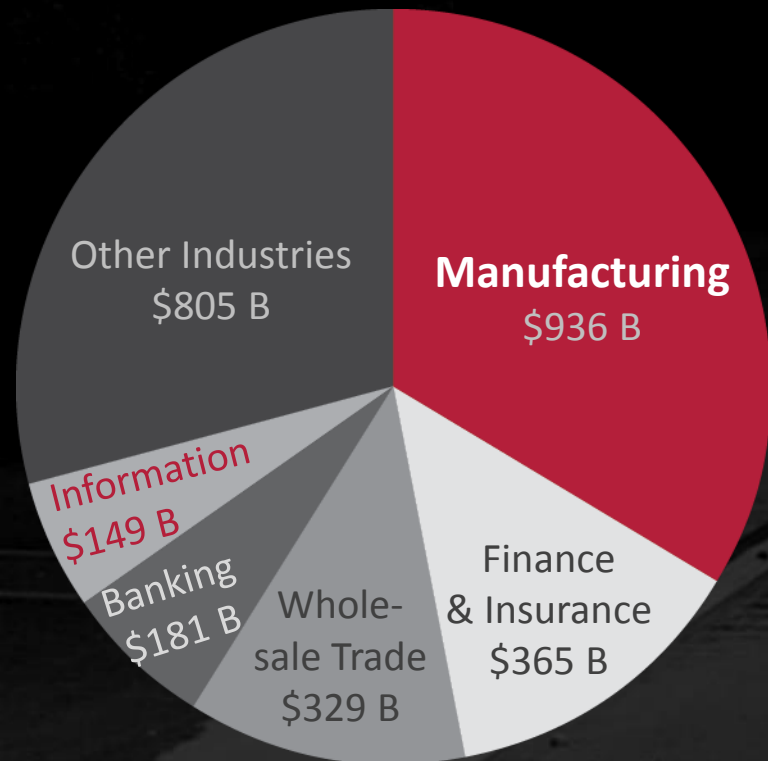
16%

Percentage of all U.S. federal corporate revenue paid by insourcing companies.

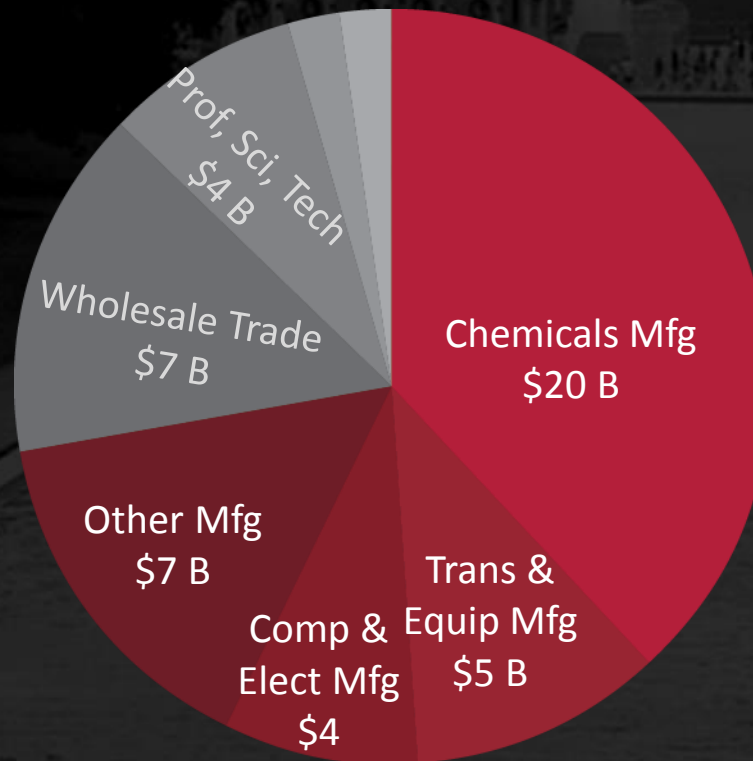


Made In America, thanks to FDI

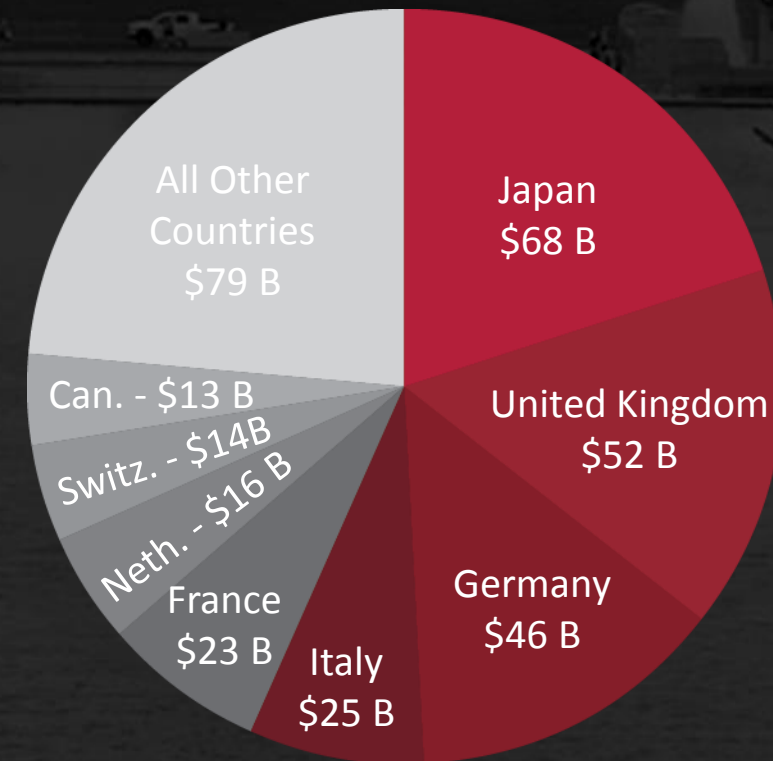
Industry Breakdown



R&D Spending



U.S. Exports

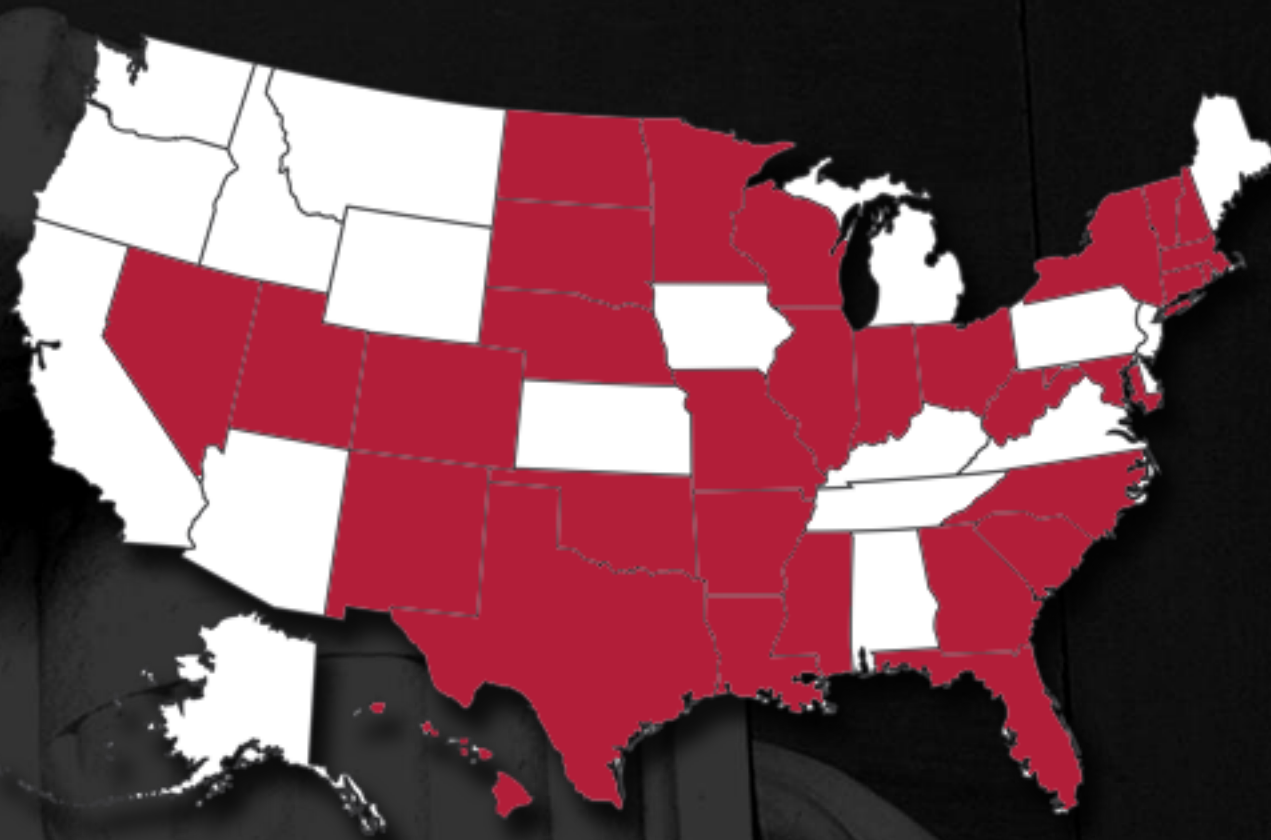


State overview

Total FDI Jobs:
3,633,000

Total FDI
Manufacturing
Jobs: **1,358,400**

Average Jobs Per
Capita: **5.0%**



America's Top Investors

**In the past 20 years
84 percent of FDI
entered the United
States through mergers
and acquisitions.**

United Kingdom

\$519 B

Japan

\$342 B

Netherlands

\$274 B

Canada

\$238 B

France

\$226B

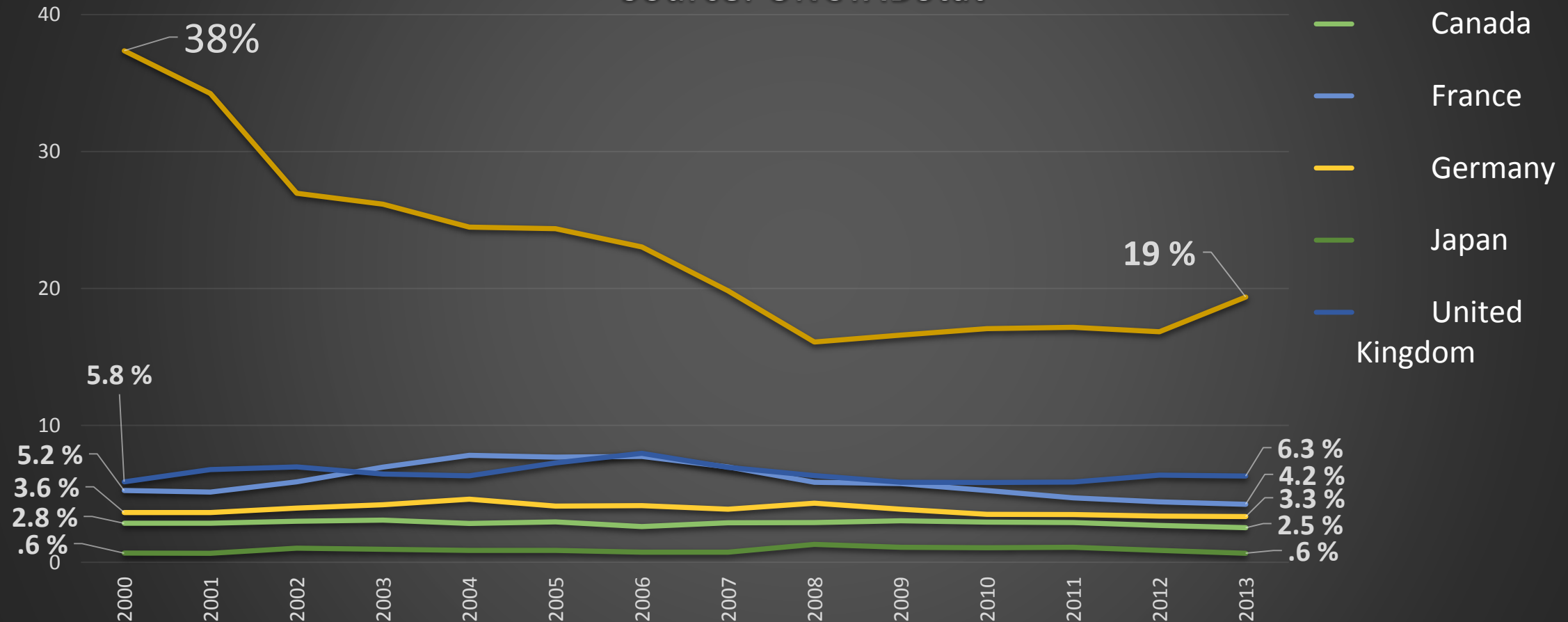
0 100 200 300 400 500 600

Cumulative Foreign Direct Investment in the United States by country through 2013

America's place in the world

FDI Stock in Select Economies as Percentage of Total World Stock

Source: UNCTADStat



What do companies think?



CFOs' View on 'Top Location for Growth'



Bringing More FDI to our shores



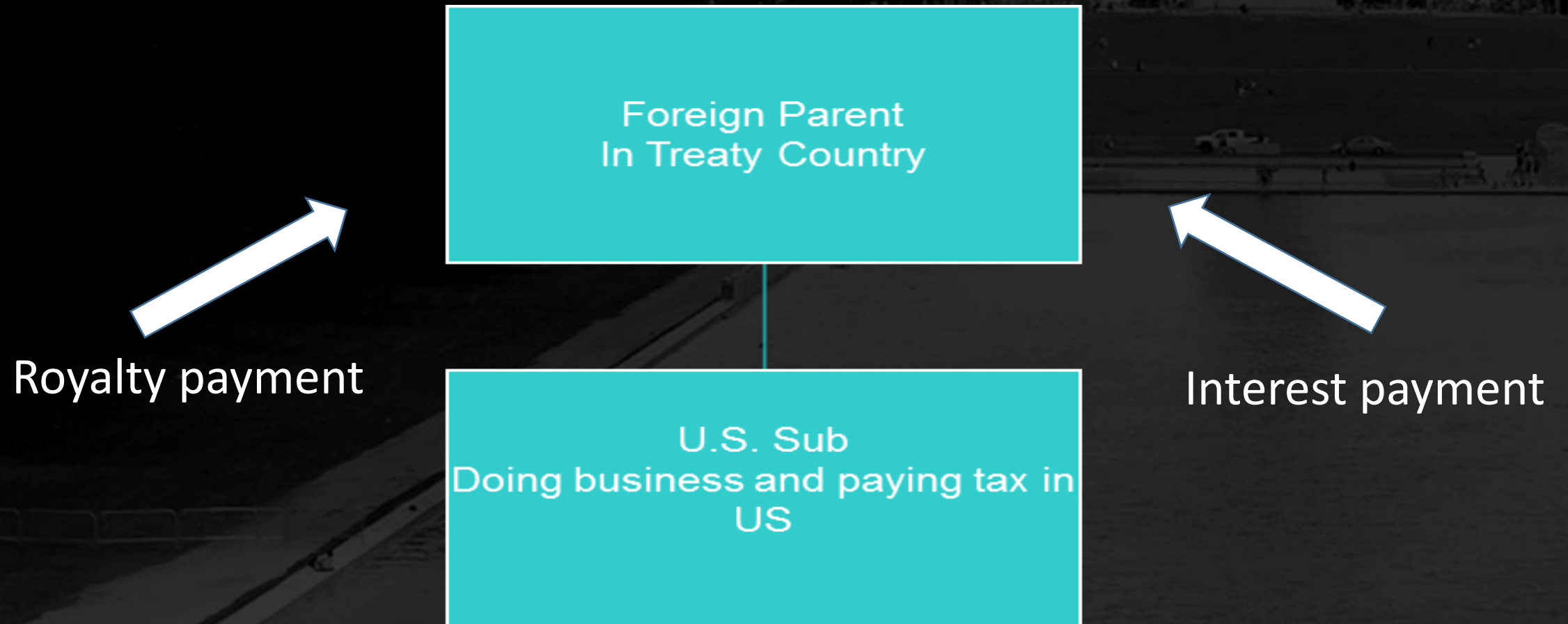
Keeping state tax codes competitive for attracting FDI

What do we mean? fact pattern

Foreign Parent
In Treaty Country

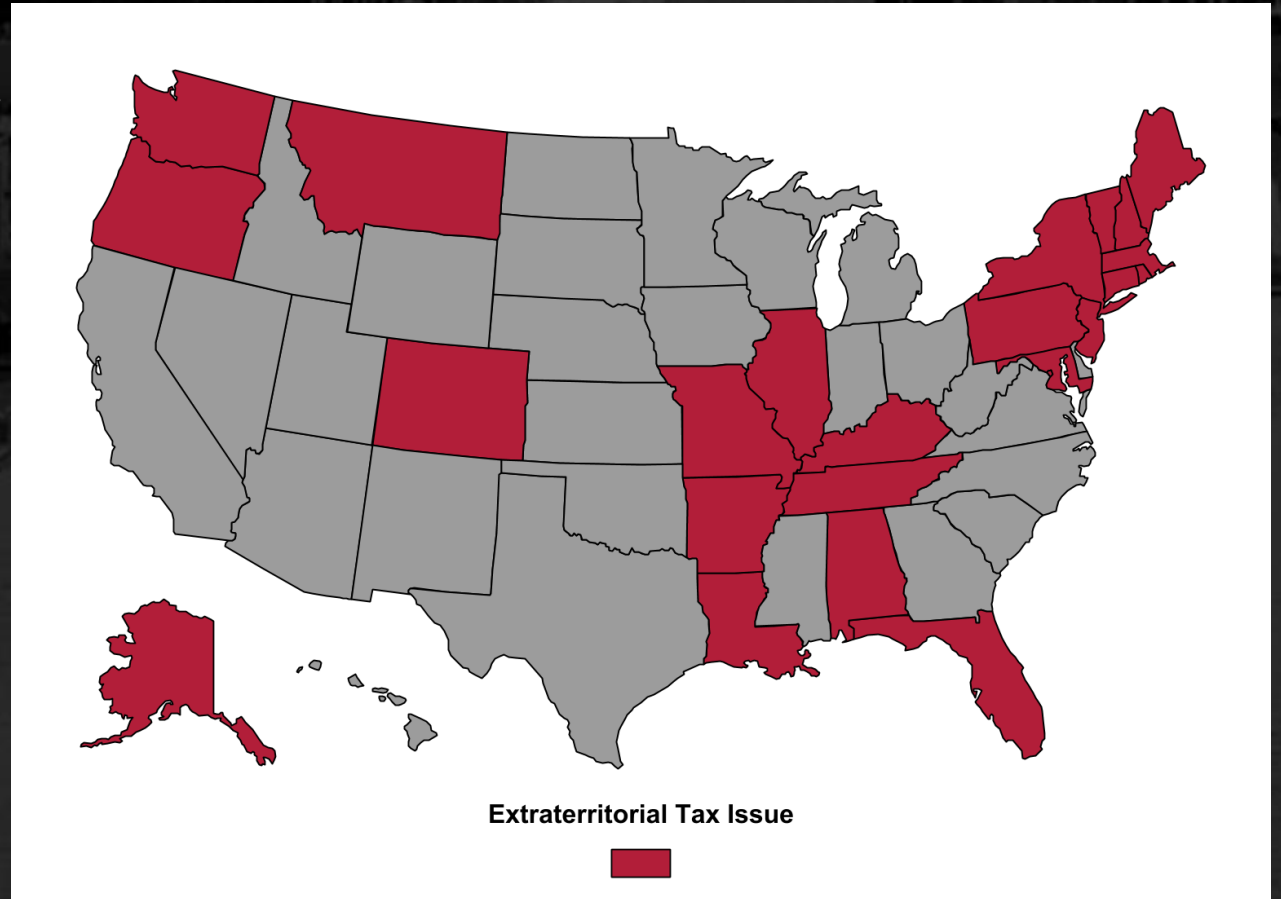
U.S. Sub
Doing business and paying tax in
US

Typical structure



Principle One: non-discrimination

4 in 10 insourcing companies say unfair tax treatment has negatively impacted their U.S. business operations



Principle 2: Align with Norms

Beyond incentives, CFOs says “state corporate tax policy aligning with international norms” is an important consideration when evaluating states as locations for new investment

- Respect a true water’s edge boundary
- Align with principles of U.S. bilateral income tax treaties



Recent tax policy trend that impacts fdi

Tax haven policy misaligns with key principles...

- **Targets legitimate business activities and abuse alike**
- **Creates barrier to foreign direct investment**
- **Misaligns with principles of U.S. tax treaty network**
- **Leads to constitutional questions**



Please keep in
touch

Evan Hoffman

ehoffman@ofii.org

202.659.1903

OFII.org

Alan Pasetsky

alan.pasetsky@us.nestle.com

203.750.7229