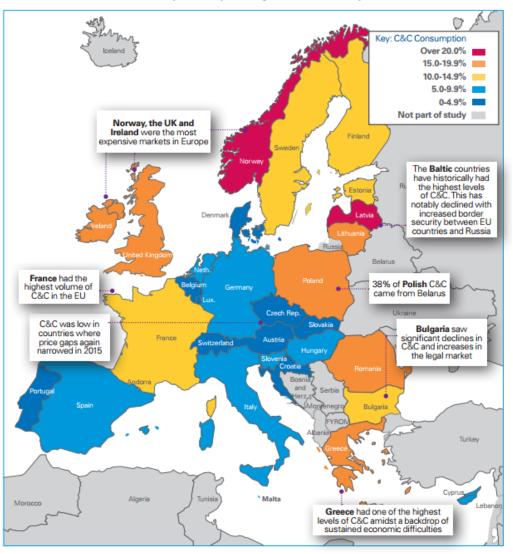
How to tackle the illicit inflows of cigarettes from Belarus

How Belarus excise system costs the EU €1 Bn a year.

53bn illicit cigarettes consumed in the EU cost €11.3bn in 2015 in lost tax revenues

Counterfeit and contraband consumption as a percentage of overall consumption - 2015(1)

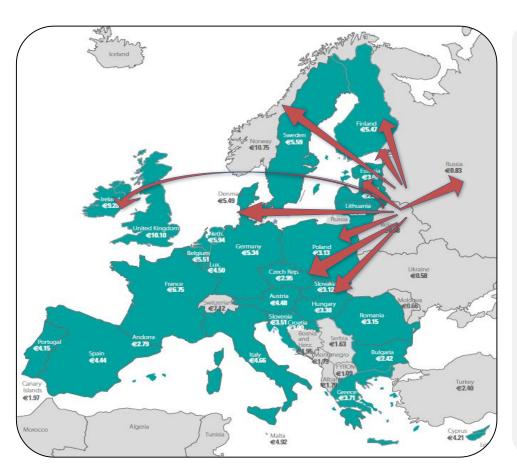


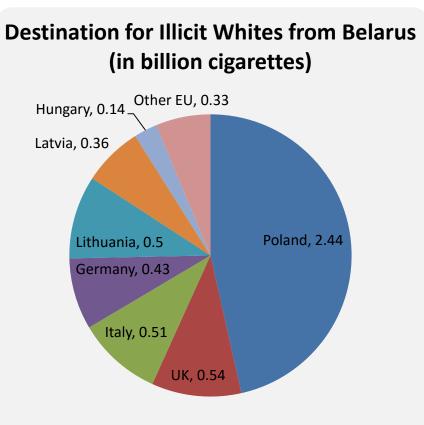
- France and Poland recorded the highest volumes of illegal cigarettes
- 88% of illegal cigarettes were coming from non-EU contraband & counterfeit
- A third of illicit cigarettes were illicit whites* representing 18.8bn cigarettes

Data: KPMG Project Sun 2015 results

^{*}Cigarettes that are usually manufactured legally in one country/market but which the evidence suggests have been smuggled across borders during their transit to the destination market under review where they have limited or no legal distribution and are sold without payment of tax.

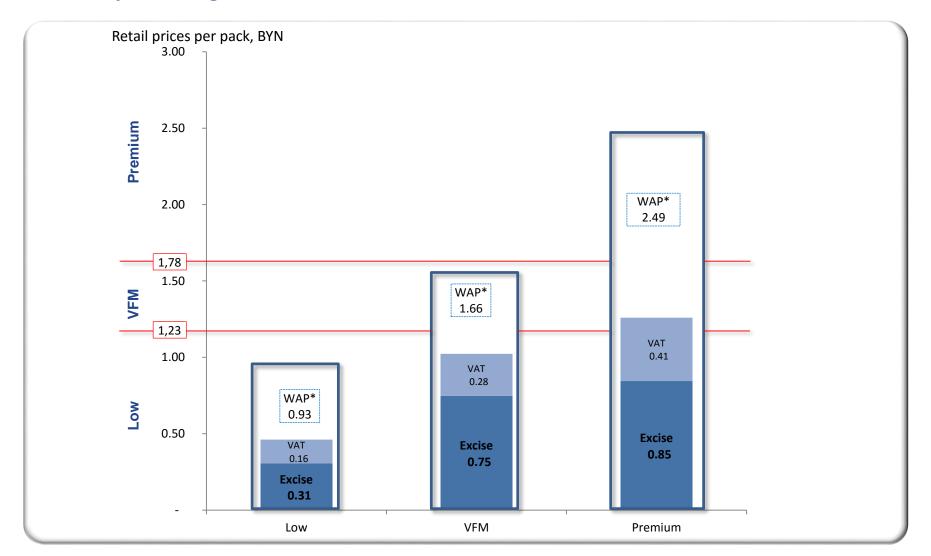
Approximately <u>5.3 billion illicit white cigarettes</u> were smuggled into the EU from Belarus in 2015...





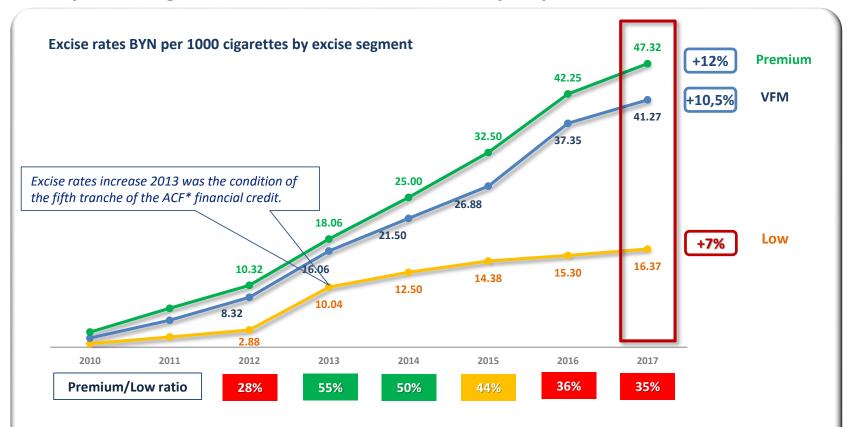
...resulting in an estimated <u>ca. 1 billion EURO loss</u> in tax revenue for EU member states.

Belarus has 3-tier specific excise structure Low priced cigarettes receive a favorable tax treatment



^{*} Weighted average retail price in segments (Nielsen Survey Belarus, Dec 2016). Excise rates are actual as Dec, 2016

Low priced cigarettes excise contribution has been declining Low priced cigarettes excise rate has not kept up with inflation



- Premium/VFM excise growth in line with cumulative CPI, Low excise protected by Government and grew significantly below CPI
- Multinational companies are not allowed to sell low priced cigarettes since 2015

^{*} ACF – Anticrisis Fund has been renamed Eurasian Fund for Stabilization and Development Source: website of EFSD (http://efsd.eabr.org/e/)

Belarus Excise Tax Reform:

An opportunity to generate additional revenue AND address structural issues

Current Structure	Proposed reform
Suboptimal Revenue	Increases government
Generation	revenues
Discriminatory	Mitigates effects of discrimination
Inconsistent with	Aligns more closely with
neighboring markets	neighbors
Enables illicit trade	Reduces incentives for illicit trade