

Opportunity Zones for Puerto Rico Government Master Plan

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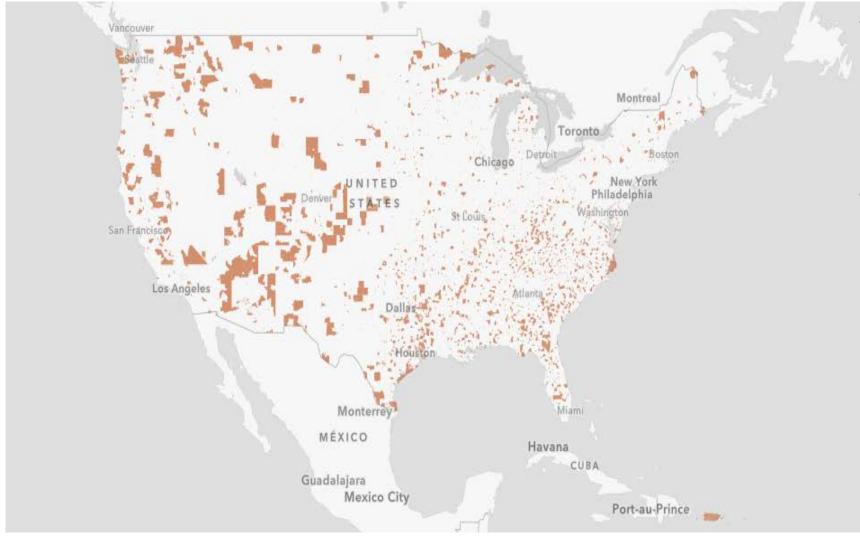


Overview – Opportunity Zones

- Basic Purpose. Opportunity Zone program was enacted in the Tax Cuts and Jobs Act (26 U.S.C. §1400Z-1 and §1400Z-2, December 2017) to spur investment of unrealized capital gains from real estate, stocks, mutual funds, etc., held by U.S. taxpayers, in economically distressed communities.
- Market: ~\$6 trillion market held by US households and corporations
- Potential Investment Pool. Congress seeks to unlock a tremendous volume of unrealized capital gains, estimated to be as high as \$6 trillion in value, to be redeployed in distressed communities.
- Opportunity Zone Designations. In June 2018, U.S. Treasury designated over 8,000 Opportunity Zones as low Income Communities ("LICs") across the country including PR, which is almost 95% OZ qualified.
- Puerto Rico Opportunities: Multi-Use Sectors (Bahia Urbana, Santurce); Ports, Hospitalities, Museums, Airports, Small & Medium Businesses, etc.
- **Potential Investors:** (1) real estate developers, (2) Private Equity Funds, (3) Philanthropic Ventures, (4) family offices etc.



Overview – Opportunity Zones



- Within the 50 states,
 D.C. and Puerto Rico,
 Opportunity Zones are home to 35 million people.
- Zones have an average poverty rate of nearly 31%, well above the 20% eligibility threshold, and an average median family income of only 59% of its area median, compared to the 80% eligibility threshold.



Overview – Opportunity Zones





Our Competitive Advantage – Opportunity Zones

- 1. Puerto Rico will use \$86.8 billion in expected federal/private investment for "Whole Community" Redevelopment and longer term transformation of economic sectors, communities, regions, infrastructure.
- 2. Our long term transformation plans are aligned with Opportunity Zone investors' 10-year investment horizon;
- 3. Puerto Rico's opportunistic property values have the potential to support strong IRR;
- 4. PR strong core fundamentals US territory, skilled labor force, diverse and developed capital market structure
- 5. Proposed local bill will enhance tax-free investment appreciation;
- Puerto Rico's economic incentives already exceed those in most states and will be adjusted as required to remain competitive. (Example: 30% tourism tax credits are transferrable and can be sold in the secondary market);
- 7. Puerto Rico has enacted expedited permitting and regulatory approvals
- 8. Significant long term investor interest already exists in key sectors, including tourism and P3's



Our Focus – Opportunity Zones

Some of the investment sectors being evaluated:



Multi Purpose Development



Energy Revitalization



Port Construction



Hospitality



Cultural and Tourism



Public Works



Commercial



Entertainment



Housing

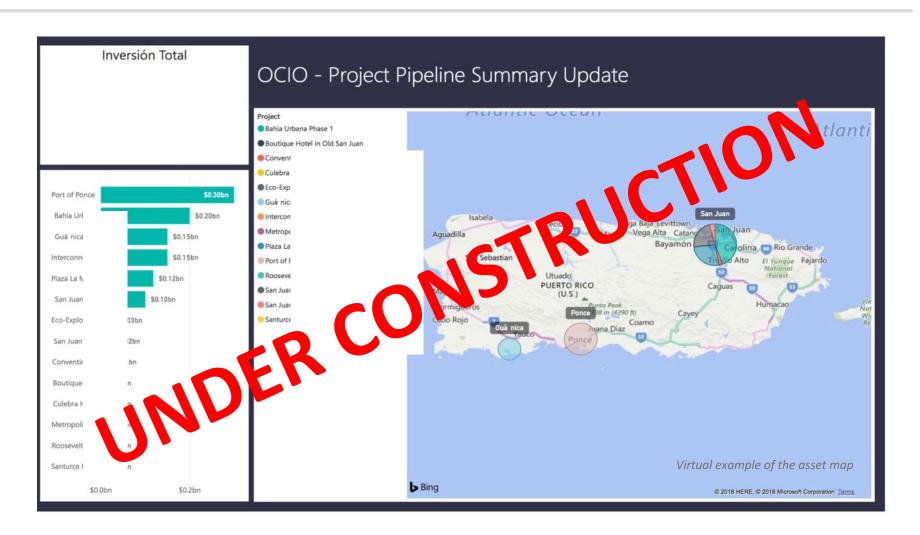
Given PR's "once in a lifetime opportunity," the possible use of federal funds, a comprehensive local legislation and attractive real estate prices, we believe that PR's IRR could represent 30-50% more than typical opportunity zones in the US.



Communication – Opportunity Zones

OCIO Webpage and Investment Map

- The OCIO has been working on a virtual map of Puerto Rico that details all new investments being negotiated and developed in the Island. The map will be accessed through the OCIO's official webpage.
- The OCIO expects to launch the webpage and a preliminary view of the map by January 2019.





Our Focus – Opportunity Zones

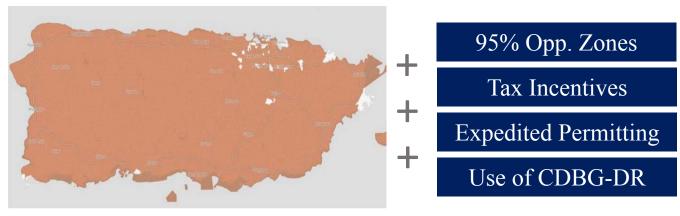
Government Master Plan:

- The Government and the OCIO are focusing on attracting new investors and reestablishing Puerto Rico's credibility in the capital market on both sides of the balance sheet.
- Our goal is to leverage on this catalyst to revamp and revitalize PR



Dispersed Opp. Zones

Isolated Boroughs



Questions

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