

## Message [REDACTED] Nicopure Labs

<b>From</b>	[REDACTED]@nfia.com)	<b>Date/Time (GMT)</b>	28 Oct 2016 20:09:27
<b>To</b>	[REDACTED]nfia.nl>	<b>Cc</b>	
<b>Company</b>	Nicopure Labs		
<b>Subject</b>	Nicopure Labs - Interested in NL / New lead		
<b>Attachments</b>	No		

**From:** [REDACTED]  
**Sent:** Thursday, October 27, 2016 3:50 PM  
**To:** [REDACTED]; [REDACTED]  
**Subject:** FW: Nicopure Labs, LLC/launch in the Netherlands

New lead [REDACTED]

[REDACTED]  
 Director

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office [REDACTED]  
 [REDACTED]@nfia.com  
[www.twitter.com/nfianorthameric](http://www.twitter.com/nfianorthameric)  
 Netherlands Foreign Investment Agency  
 1175 Peachtree Street  
 100 Colony Square | Suite 1206  
 Atlanta | GA | 30361 | USA

**From:** [REDACTED]@nicopure.com]  
**Sent:** Thursday, October 27, 2016 3:47 PM  
**To:** [REDACTED]  
**Subject:** Nicopure Labs, LLC/launch in the Netherlands

Dear [REDACTED],

I represent Nicopure Labs, LLC, based in Trinity, FL near Tampa. We are looking to [REDACTED]  
 [REDACTED]

We were excited to learn of the existence of the Netherlands Foreign Investment Agency and would be very interested in speaking with you about how we can work together to launch our Netherlands operation.

Would you be available for a brief introductory call tomorrow?

Best Regards,

[REDACTED]  
 email: [REDACTED]@nicopure.com  
 tel: [REDACTED]



## Message [REDACTED] Nicopure Labs

<b>From</b>	[REDACTED] ([REDACTED]@nfia.com)	<b>Date/Time (GMT)</b>	08 Nov 2016 17:43:55
<b>To</b>	[REDACTED] [REDACTED]@ndl.nl>	<b>Cc</b>	[REDACTED] [REDACTED]@ndl.nl> [REDACTED] <[REDACTED]nfia.nl>
<b>Project</b>	Nicopure Labs		
<b>Subject</b>	RE: NicoPure Labs - Moving forward Nicopure Job Descriptions		

Yes, will do!

[REDACTED]  
Director

office [REDACTED]  
mobile [REDACTED]  
[REDACTED]@nfia.com  
www.twitter.com/nfia\_USCanada

Netherlands Foreign Investment Agency  
1175 Peachtree Street  
100 Colony Square | Suite 1206  
Atlanta | GA | 30361 | USA

From: [REDACTED] [mailto:[REDACTED]@ndl.nl]  
Sent: Tuesday, November 8, 2016 9:09 AM  
To: [REDACTED] <[REDACTED]@nfia.com>  
Cc: [REDACTED] <[REDACTED]@ndl.nl>  
Subject: RE: NicoPure Labs - Moving forward Nicopure Job Descriptions

[REDACTED]  
Heeft het zin ze nog en keer te benaderen en een call voor te stellen? [REDACTED]  
[REDACTED]

[REDACTED]  
From: [REDACTED] [mailto:[REDACTED]@nicopure.com]  
Sent: donderdag 3 november 2016 17:12  
To: [REDACTED] <[REDACTED]@nfia.com<mailto:[REDACTED]@nfia.com>>  
Cc: [REDACTED] <[REDACTED]@ndl.nl<mailto:[REDACTED]r@ndl.nl>>; [REDACTED]  
<[REDACTED]@ndl.nl<mailto:[REDACTED]@ndl.nl>>  
Subject: RE: NicoPure Labs - Moving forward Nicopure Job Descriptions

Hi [REDACTED]

Thank you for this informative email and the introductions to [REDACTED]  
Gentlemen, it is a pleasure to make your acquaintance, albeit virtually.

We have been very encouraged by what we have learned about both NFIA and HIDC and look forward to discussing our plans with you for doing business in the Netherlands.

I will forward this email to Nicopure's [REDACTED], and we will get back to [REDACTED] regarding our next step forward.



Thanks.

Best Regards,

██████████

██████████  
email: ██████████@nicopure.com<mailto:██████████@nicopure.com>  
tel: ██████████

From: ██████████ [mailto:██████████@nfia.com]  
Sent: Thursday, November 03, 2016 2:09 PM  
To: ██████████ <██████████@nicopure.com<mailto:██████████@nicopure.com>>  
Cc: ██████████ <██████████@ndl.nl<mailto:██████████@ndl.nl>>; ██████████  
<██████████@ndl.nl<mailto:██████████@ndl.nl>>  
Subject: NicoPure Labs - Moving forward Nicopure Job Descriptions

Hi ██████████

The pleasure was all mine. I loved learning about NicoPure Labs and your plans for the Netherlands. I totally understand that you want the job descriptions to be tailor made for the European market.

Allow me to introduce you to our colleagues from the Holland International Distribution Council (HIDC // [www.hidc.nl](http://www.hidc.nl)<<http://www.hidc.nl>>). They are a non-profit public-private organization, representing the logistics sector in the Netherlands and working closely together with the Dutch government in general and the NFIA. Their widely expanded network includes service providers in all fields to consultants, researchers, innovation platforms and trade associations.

Based on their experience and in-depth knowledge of European logistics, HIDC supplies tailor-made advice and matchmaking services to foreign companies that are entering the European market or re-engineering their European supply chain structures. Their services consist of four steps:

1. Advice on European supply-chain structures and assistance in defining logistics requirements<<http://www.ndl.nl/services/defining-your-logistics-requirements/>>
2. Neutral advice on logistics partner selection<<http://www.ndl.nl/services/preparing-a-selection-of-network-partners/>>
3. Fact-finding trip in the Netherlands to meet potential partners<<http://www.ndl.nl/services/arranging-fact-finding-trips/>>
4. Assistance with every step - now and in the future<<http://www.ndl.nl/services/assistance-with-every-step/>>

██████████ (cc) is our direct contact with the HIDC in Miami. Our Dutch contact at HIDC is ██████████ (cc). I included an overview of the services that HIDC can provide and a brochure about the logistics value proposition the Netherlands has to offer.

Shall we set up a next call within two weeks to discuss further steps?

Looking forward to your reply.

Warm regards, ██████████

██████████  
Director

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Atlanta | GA | 30361 | USA

From: [REDACTED] [[mailto:\[REDACTED\]@nicopure.com](mailto:[REDACTED]@nicopure.com)]  
Sent: Wednesday, November 2, 2016 4:54 PM  
To: [REDACTED] <[\[REDACTED\]@nfia.com](mailto:[REDACTED]@nfia.com)<[mailto:\[REDACTED\]@nfia.com](mailto:[REDACTED]@nfia.com)>>>  
Subject: Nicopure Job Descriptions

Hello [REDACTED]

It was great speaking with you yesterday. Thanks again for taking the time.

Upon reviewing our job descriptions, we realized they may be too tailored to our Gainesville, FL facility requirements.

We've decided to edit them a bit. I hope to have them to you sometime tomorrow.

Best Regards,

[REDACTED]

[REDACTED]  
email: [REDACTED]@nicopure.com<[mailto:\[REDACTED\]@nicopure.com](mailto:[REDACTED]@nicopure.com)>  
tel: [REDACTED]



Message [redacted] Nicopure Labs

<b>From</b>	[redacted] [redacted]@nfa.com)	<b>Date/Time (GMT)</b>	23 Nov 2016 21:20:00
<b>To</b>	[redacted] [redacted]<[redacted]@ndf.nl>	<b>Cc</b>	[redacted] [redacted]<[redacted]@rvo.nl>
<b>Project</b>	Nicopure Labs		
<b>Subject</b>	Nicopure Labs - FW: Nicopure Job Descriptions		
<b>Attachments</b>	Yes (Click here to go there)	<b>Flags</b>	



Ha [redacted]

Did I send you these already?

Talk to you within the hour!

Regards, [redacted]

[redacted]

Director

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office [redacted]  
mobile [redacted]  
[redacted]@nfia.com  
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100 Colony Square | Suite 1206  
Atlanta | GA | 30361 | USA

**Services:**

- Provide benchmark information on: labor quality, operational costs, regulations, infrastructure, quality of life, etc.
- Facilitate introductions to the Dutch Tax, Customs, and Immigration Authorities
- Offer intensive personal guidance on tax regulations, labor issues, and permit procedures
- Make all steps involved in European expansion insightful (provide roadmap) and offer a red carpet treatment
- Organize tailor-made fact-finding trips, allowing you to visit sites and meet with organizations and service providers in NL
- Facilitate introductions to: commercial service providers, testimonial companies, networks, and branch organizations
- Provide consultation on: site selection, supply chain structures, and 3PL selection
- Act as sparring partner for the decision making team

Free of charge and confidential

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**From:** [redacted] [mailto:[redacted]@nicopure.com]  
**Sent:** Thursday, November 3, 2016 4:35 PM  
**To:** [redacted] <[redacted]@nfia.com>  
**Subject:** Nicopure Job Descriptions

Hello [redacted]

As we discussed, attached are two Nicopure job descriptions. One for Warehouse Manager and one for Shipping Manager. They are not tailored for the Netherlands in any specific way, just less specific as relates to our Gainesville facility's requirements.

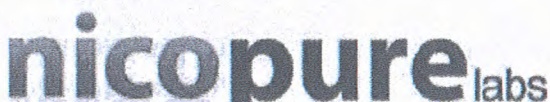
The Warehouse Manager description has references to US regulatory entities, such as FDA and OSHA. I am hoping that whomever assists us in reviewing these descriptions can rework these references to be more Netherlands appropriate.

By the way, I received your email earlier this afternoon but have not yet reviewed it in detail. I will do so shortly and respond.

Thanks for your help on this.

[redacted]

email: [redacted]@nicopure.com  
tel: [redacted]





## NICOPURE LABS, LLC

## JOB DESCRIPTION

**Job Title:** Warehouse Manager

**Department:** Warehouse

**Summary Description:** Procure and manage product materials, equipment and supplies. The Warehouse Manager coordinates and directs the receiving functions, warehousing protocols, distribution services and team member management.

**Tasks & Responsibilities:**

- Initiate, coordinate and enforce policy and procedure programs for operations and employee management.
- Comply with State, Federal, and local guidelines as they relate to warehousing, material handling and shipping.
- Stay current and compliant with existing legislation and new legislative actions.
- Safeguard warehouse operations and contents by establishing and monitoring security procedures and protocols.
- Control inventory levels by conducting physical counts.
- Maintain physical condition of warehouse by planning and implementing new design layouts, inspecting equipment, issuing work orders for needed repairs and processing requisitions for equipment replacement.
- Schedule and assign team members per department needs and responsibilities. Work projects are evaluated for timeliness and completion.
- Monitor and manage Warehouse staff through planning, coaching, counseling, discipline and appraisal.
- Assure department and team member safety programs and policies are established and practiced.
- Contribute to team effort by assessing team member needs, productivity, and retention.

**Qualifications/Experience:**

- Relevant training and application in warehouse environment.
- 2-4 years of relevant experience with FDA regulations/requirements
- 2 Year degree preferred
- SAP Knowledge required.
- Willingness to learn and excel.

**Required Skills and Abilities:**

- Ability to work in a fast-paced environment.
- Able to multi-task activities.
- Ability to supervise, administer Safety Management, develop standards, manage processes, enforce surveillance skills and optimize inventory control.
- Attention to detail.
- Organizational acumen, particularly as relates to reporting skills, inventory control and equipment maintenance.
- Ability to stand for long or extended periods of time.
- Time management skills required. A proficiency must be realized in order to further establish productivity thresholds.
- Clear and concise communication skills are required. Ability to instruct others as to the warehouse process.
- SAP Warehouse/Inventory Control required.
- GMP and FDA knowledge required
- Extensive OSHA knowledge pertaining to proper storage, containment, labeling, etc. required



## NICOPURE LABS, LLC

## JOB DESCRIPTION

**Job Title:** Shipping Manager

**Department:** The Shipping Department

**Summary Description:**

The Shipping Manager oversees all shipping activities, maintaining an organized and streamlined process for daily shipping department operations to ensure the accuracy, completeness and successful delivery of all shipments.

**Tasks & Responsibilities:**

- Ensure that each package leaving the facility is accounted for, contains accurate shipment data, and is successfully delivered to the intended recipient in an efficient, cost-effective way.
- Establish and maintain beneficial relationships with shipping couriers to ensure successful execution, resolve problems, communicate changes.
- Establish verification/reconciliation processes with shipping couriers to ensure accurate billing.
- Investigate and resolve shipping/delivery issues.
- Process eligible claims. Track voids, damages, claims and shipping refunds.
- Provide shipping data/reports required for negotiating better pricing agreements.
- Schedule and assign team members per department needs and responsibilities.
- Monitor and manage Shipping Department staff through planning, coaching, counseling, discipline and appraisal.
- Coordinate shipping relevant improvements for the warehouse and the shipping department.
- Review monthly transit reports from shipping couriers to evaluate transit times.
- Provide interdepartmental assistance and support to Sales, Customer Service, Accounting and Warehouse.
- Order transportation supplies.

**Qualifications/Experience:**

- Knowledge of and experience with transportation systems and all shipping functions, international and domestic.
- 2-4 years relevant shipping management experience.
- Proficiency in Excel and experience with SAP.
- Knowledge of safety management procedures.
- Highly motivated, self-disciplined and eager to learn.

**Required Skills and Abilities:**

- Strong organizational and time management skills.
- Strong verbal and written communication skills.
- Ability to work in a fast-paced environment.
- Able to multi-task activities.
- Ability to supervise, develop standards, manage processes.
- Attention to detail.



## Message [REDACTED] Nicopure Labs

From	[REDACTED]@nfia.com	Date/Time (GMT)	14 Dec 2016 15:22:38
To	[REDACTED]@rvo.nl	Cc	
Project	Nicopure Labs		
Subject	NicoPure Labs - introduction Dutch customs		
Attachments	No	Flags	

Customs call planned!

[REDACTED]  
Director

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#### Services:

- Provide **benchmark information** on: labor quality, operational costs, regulations, infrastructure, quality of life, etc.
- Facilitate introductions to the **Dutch Tax, Customs, and Immigration Authorities**
- Offer **intensive personal guidance** on tax regulations, labor issues, and permit procedures
- Make all steps involved in European expansion insightful (provide **roadmap**) and offer a **red carpet treatment**
- Organize tailor-made **fact-finding trips**, allowing you to visit sites and meet with organizations and service providers in NL
- Facilitate **introductions** to: commercial service providers, testimonial companies, networks, and branch organizations
- Provide consultation on: **site selection, supply chain structures, and 3PL selection**
- Act as **sparring partner** for the decision making team

#### Free of charge and confidential

From: [REDACTED]@belastingdienst.nl [mailto:[REDACTED]@belastingdienst.nl]

Sent: Wednesday, December 14, 2016 2:38 AM

To: [REDACTED]@nicopure.com>

Cc: [REDACTED]@nfia.com>; [REDACTED]@belastingdienst.nl; [REDACTED]@nicopure.com>; [REDACTED]@ndl.nl>; [REDACTED]@nicopure.com>

Subject: Betr: RE: Betr: RE: NicoPure Labs - introduction Dutch customs

Dear Mr [REDACTED]

I herewith confirm my participation for the CC on December 21 at 15:00 PM local time in the Netherlands.

Met vriendelijke groet / Kind Regards



Douane  
Belastingdienst



.....  
Douane Rotterdam - Rijnmond (DRR)  
Laan op Zuid 391- 3072 DB - Rotterdam 7e etage



Postbus 30/U - 6401 DN - Heerlen  
Belastingdienst/Douane  
Ministerie van Financien

T  
M  
[redacted]@belastingdienst.nl

[redacted] —13-12-2016 16:51:07—Dear [redacted], Thank you for accepting our invitation to have a call.

Van: [redacted] <[redacted]@nicopure.com>  
Aan: [redacted]@belastingdienst.nl" [redacted]@belastingdienst.nl>  
Cc: [redacted] <[redacted]@nfia.com>, [redacted] <[redacted]@nicopure.com>, [redacted] " [redacted] r@ndl.nl>, [redacted]@belastingdienst.nl" <[redacted]@belastingdienst.nl>, [redacted] <[redacted]@nicopure.com>  
Datum: 13-12-2016 16:51  
Onderwerp: RE: Betr: RE: NicoPure Labs - introduction Dutch customs

Dear [redacted],

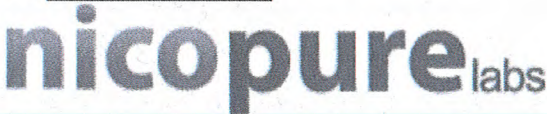
Thank you for accepting our invitation to have a call.

May we schedule our call for one of your available times, December 21 at 15:00 PM local time in the Netherlands?

We look forward to your confirmation.

Kind Regards,

[redacted]  
email: [redacted]@nicopure.com  
tel: [redacted]



From: [redacted]@belastingdienst.nl [mailto:[redacted]@belastingdienst.nl]  
Sent: Tuesday, December 13, 2016 2:13 AM  
To: [redacted] <[redacted]@nicopure.com>  
Cc: [redacted] <[redacted]@nfia.com>; [redacted] <[redacted]@nicopure.com>; [redacted] <[redacted]@ndl.nl>; [redacted]@belastingdienst.nl  
Subject: Betr: RE: NicoPure Labs - introduction Dutch customs

Dear [redacted] and [redacted],

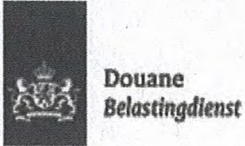
Thanks for the invitation.

Of course the Dutch customs authorities are willing to inform Nicopure in a conference call to explain (EU & Dutch) laws and regulations. As regards the proposed dates I have to excuse myself due to the fact that I have no room to participate. Currently it is especially busy. I still have space on 19th and 21th of December at the proposed time (local time in the Netherlands 15:00 PM)

looking forward hearing from you.



Met vriendelijke groet / Kind Regards



Douane Rotterdam - Rijnmond (DRR)  
Laan op Zuid 391- 3072 DB - Rotterdam 7e etage  
Postbus 3070 - 6401 DN - Heerlen  
Belastingdienst/Douane  
Ministerie van Financien

T  
M  
[redacted]@belastingdienst.nl

[redacted] --12-12-2016 22:09:01--Hi [redacted] Thank you for the introduction. Hello [redacted].

Van: [redacted] <[redacted]@nicopure.com>  
Aan: [redacted] <[redacted]@nfia.com>  
Cc: [redacted] <[redacted]@ndl.nl>, [redacted] <[redacted]@belastingdienst.nl>, [redacted] <[redacted]@belastingdienst.nl>, [redacted] <[redacted]@nicopure.com>  
Datum: 12-12-2016 22:09  
Onderwerp: RE: NicoPure Labs - introduction Dutch customs

Hi [redacted]

Thank you for the introduction. Hello [redacted].

We are available for a call at 9:00AM US-time tomorrow, if that works for [redacted]

Best Regards,



email: [redacted]@nicopure.com  
tel: [redacted]

**nicopure** labs





**From:** [REDACTED] [mailto:[REDACTED]@nfia.com]  
**Sent:** Monday, December 12, 2016 2:47 PM  
**To:** [REDACTED] <[REDACTED]@nicopure.com>  
**Cc:** [REDACTED] <[REDACTED]@ndl.nl>; [REDACTED] <[REDACTED]@belastingdienst.nl>  
**Subject:** NicoPure Labs - introduction Dutch customs

Hi [REDACTED]

I would like to introduce you to our colleague at the Dutch customs (Douane) (cc): [REDACTED]

What would be a good day and time to set up a call for you both? Would tomorrow or Thursday morning (US-time) be convenient? [REDACTED] is based in the Netherlands and there is a 6 hour difference.

I look forward to your replies, so I can setup the call.

Warm regards, [REDACTED]

[REDACTED]  
Director

office [REDACTED]  
mobile [REDACTED]  
[REDACTED]@nfia.com  
www.twitter.com/nfia\_USCanada

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**Services:**

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- Provide consultation on: **site selection, supply chain structures, and 3PL selection**
- Act as **sparring partner** for the decision making team

**Free of charge and confidential**

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Message [redacted] Nicopure Labs

From	[redacted]@nfia.com)	Date/Time (GMT)	22 Dec 2016 18:25:14
To	[redacted]@ndf.nl>	Cc	[redacted]@belastingdienst.nl>
Project	Nicopure Labs		
Subject	NicoPure Labs - Call with Customs - Meeting report		
Attachments	No	Flags	

Meeting report: Custom ([redacted])

- ... Main topic: how to get a license for a bonded warehouse: what are pro's and con's, what does the compliance look like
- ... [redacted] explained about new legislation that is in place within the EU, since May 1<sup>st</sup>. Customs Handbook is leading in this. Processing through customs takes about 30 days. All via EDI (Electronic Data Interchange) <http://www.belastingdienst.nl/bibliotheek/handboeken/html/boeken/HDU/>
- ... They need a law firm to help them with applying for the license: question is if [redacted] is able to help them with this.
- ... Once they have it in place, they'll be assigned a custom clearance agent;
- ... Bonded warehouse gives them the opportunity to import goods and machinery (via T1 (outside EU) ticket) straight from Schiphol, via a carrier, to their warehouse (which basically is a part of the US when its bonded).
  - o You don't pay custom rights;
  - o No VAT
- ... Question from NicoPure: can you import machinery without customs debts and VAT as well? Since the machinery is never leaving the bonded premises. [redacted] will check this with his colleagues.
- ... AEO certification is an option as well.

**Actions:**

- ... We will help them with the first round of paperwork // where to find it, etc. [redacted] will guide is to the most important documents.
- ... Check if [redacted] can help them or if they need a specialized customs broker (HIDC network);

[redacted]  
Director

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office [redacted]  
mobile [redacted]  
[redacted]@nfia.com  
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- Organize tailor-made fact-finding trips, allowing you to visit sites and meet with organizations and service providers in NL



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Files

From: [redacted] [mailto:[redacted]@nicopure.com]  
Sent: dinsdag 3 januari 2017 12:23  
To: [redacted] <[redacted]@nfia.com>; [redacted] <[redacted]@ndl.nl>  
Cc: [redacted] <[redacted]@nicopure.com>; [redacted] <[redacted]@nicopure.com>  
Subject: Thank You

Hello [redacted] and [redacted]:

We wanted to let you know that we have decided to go with [redacted] for our Netherlands warehouse start-up project.

Today we advised both [redacted] and [redacted] of this decision. [redacted] will start on the project tomorrow.

We will be informing [redacted] and [redacted] of our decision as well.

Thank you both for your effort, advice and introductions. NFIA and HIDC have been a great help to us and we expect to be reaching out to you again as we launch our Netherlands operation.

Best Regards,

[redacted]  
[redacted]  
email: [redacted]@nicopure.com  
tel: [redacted]

**nicopure** labs





For files

**From:** [redacted]  
**Sent:** Tuesday, January 17, 2017 11:32 AM  
**To:** [redacted] <[redacted]@nicopure.com>  
**Cc:** [redacted] <[redacted]@ndl.nl>  
**Subject:** NicoPure Labs - introduction to service providers concerning ICT?

Hi [redacted]

Yes, that does ring a bell. This is called the Inter Corporate Transfer legislation (see the attachment by Bridgge).

I can introduce you to several trusted service providers we work with. A few examples:

- [redacted]
- [redacted]
- [redacted]

Would you like me to make an introduction to them or will you be reaching out yourself?

Look forward to your reply.

Warm regards, [redacted]

[redacted]  
Director

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office [redacted]  
 mobile [redacted]  
 [redacted]@nfia.com  
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**Services:**

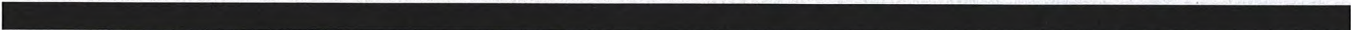
- Provide **benchmark information** on: labor quality, operational costs, regulations, infrastructure, quality of life, etc.
- Facilitate introductions to the Dutch **Tax, Customs, and Immigration Authorities**
- Offer intensive **personal guidance** on tax regulations, labor issues, and permit procedures
- Make all steps involved in European expansion insightful (provide **roadmap**) and offer a **red carpet treatment**
- Organize tailor-made **fact-finding trips**, allowing you to visit sites and meet with organizations and service providers in NL
- Facilitate **introductions** to: commercial service providers, testimonial companies, networks, and branch organizations
- Provide consultation on: **site selection, supply chain structures, and 3PL selection**
- Act as **sparring partner** for the decision making team

Free of charge and confidential

**From:** [redacted] [mailto:[redacted]@nicopure.com]  
**Sent:** Tuesday, January 17, 2017 11:09 AM  
**To:** [redacted] <[redacted]@nfia.com>  
**Cc:** [redacted] <[redacted]@ndl.nl>  
**Subject:** RE: Follow up to 12/21/16 call/Dutch Customs, NFIA Nicopure Labs

Hi [redacted]

I wanted to follow up with you on something else that you may have mentioned during the call with Dutch Customs (or maybe another call); I believe you had mentioned a new Dutch law that has been passed that allows more flexibility to





foreign employees working in the Netherlands for their foreign employer? Does this ring a bell?

█

**From:** █ [mailto:█@nfia.com]  
**Sent:** Monday, January 16, 2017 12:21 PM  
**To:** █ <█@nicopure.com>  
**Cc:** █@ndl.nl>  
**Subject:** RE: Follow up to 12/21/16 call/Dutch Customs, NFIA Nicopure Labs

Hi █

I am great! How are you?

I have been in contact with █ last week. █ needs some more information about what the machines are being used for. It's my understanding that it's mainly for value added logistics. Is that correct?

Look forward to your reply!

Regards, █

█

Director

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office █  
mobile +1 770 335 2014  
█@nfia.com  
www.twitter.com/nfia\_USCanada

Netherlands Foreign Investment Agency  
1175 Peachtree Street  
100 Colony Square | Suite 1206  
Atlanta | GA | 30361 | USA

**Services:**

- Provide **benchmark information** on: labor-quality, operational costs, regulations, infrastructure, quality of life, etc.
- Facilitate introductions to the Dutch **Tax, Customs, and Immigration Authorities**
- Offer intensive **personal guidance** on tax regulations, labor issues, and permit procedures
- Make all steps involved in European expansion insightful (provide **roadmap**) and offer a **red carpet treatment**
- Organize tailor-made **fact-finding trips**, allowing you to visit sites and meet with organizations and service providers in NL
- Facilitate **introductions** to: commercial service providers, testimonial companies, networks, and branch organizations
- Provide consultation on: **site selection, supply chain structures, and 3PL selection**
- Act as **sparring partner** for the decision making team

Free of charge and confidential

**From:** Michael Knight [mailto:█@nicopure.com]  
**Sent:** Friday, January 13, 2017 12:26 PM  
**To:** █ <█@nfia.com>  
**Subject:** FW: Follow up to 12/21/16 call/Dutch Customs, NFIA Nicopure Labs

Hi █

How are you doing?

Things are proceeding well for us with █

Have you heard anything from █ since our joint call with him last month?

Best Regards,

█



## Memo

Implementation Intra Corporate Transferees Directive (2014/66/EU)

December 2016

### KEY POINTS

#### WHEN DOES THE ICT DIRECTIVE APPLY?

Employees being temporarily transferred to the NL, fall under the ICT Directive if the following facts apply:

- Employee is a non EU, EER or Swiss citizen;
- Employee resides outside of the EU at the time of application;
- Employee has been employed by the company outside of the EU for at least 3 months prior to the transfer ;
- Employee will be transferred within an international group of companies, from a company outside of the EU to a group company in the NL;
- In the 6 months prior to the transfer, employee did not reside in the NL as a result of an earlier transfer within the international group of companies under the ICT Directive.
- Employee is a manager, specialist or trainee;
- Employee will remain under contract with the company based outside of the EU;
- Employee's transfer to the NL will last longer than 90 days;
- Employee's salary is at least equal to the salary criteria for Highly Skilled Migrants but is not lower than prevailing market rates.

*\*For more details with regard to above as well as additional conditions, see 'Conditions to be met'*

### Introduction

On November 29, 2016, the Netherlands implemented the EU Intra Corporate Transferees Directive ("the ICT Directive"). The ICT Directive was implemented to improve the temporary transfer of highly skilled, non-EU nationals from outside the EU to group companies throughout EU member states. All EU member states, except for Denmark, Ireland and the UK, will be implementing the ICT Directive, although not all are expected to do so simultaneously.

The ICT Directive significantly affects Dutch immigration rules since the ICT Directive has precedence over national legislation. This means that if the employee to be transferred falls under the scope of the ICT Directive, the employee will not be eligible for the Dutch Highly Skilled Migrant combined residence/work permit.

The implementation of the ICT Directive will not impact those employees who currently reside in the Netherlands with Highly Skilled Migrant combined residence/work permits issued prior to November 29, 2016.

### Conditions to be met

An employee being transferred to the Netherlands must apply for a ICT Directive combined residence/work permit if:

- The employee is not a EU, EER or Swiss national.
- The employee's main place of residence is outside of the Netherlands at the moment of submission of the application.
- Prior to being transferred, the employee was employed with the company outside the EU for at least 3 months.
- The employee will be transferred within an international group of companies; from a company outside of the EU to a group company in the Netherlands.



- In the 6 months prior to the ICT Directive application, the employee has not resided in the Netherlands as a result of an earlier transfer within the international group of companies under the ICT Directive.
- The employee is a manager, a specialist or a trainee.

The employee must have the qualifications and experience needed for his or her management or specialist position. Under qualifications should be understood a higher education degree (e.g. a university degree). A trainee must have a Master's degree and must follow a trainee programme (i.e. not be employed as a regular employee).

- The employee has an employment contract with the company based outside of the EU and will be transferred to a group company in the Netherlands with an assignment letter.
- The employee's transfer to the Netherlands will last longer than 90 days.
- The employee's salary must at least meet the minimum monthly salary criteria for Highly Skilled Migrants but it cannot be below prevailing market rates. This also applies to trainees.

IND minimum monthly salary criteria (2016):

- ❖ for employees under 30 years of age: € 3.108, excluding 8% vacation allowance
- ❖ for employees above 30 years of age: € 4.240, excluding 8% vacation allowance

**Additional conditions:**

- The Netherlands is the EU member state where the employee will reside for the majority of his or her time during the transfer (in the event of frequent travel within EU member states).
- The group company in the Netherlands to which the employee will be transferred has not been established for the sole purpose of simplifying the admission of transferees.
- The transferring company based outside of the EU or the Dutch group company must carry out economic activity.
- The receiving company must not have been fined in the 5 years immediately preceding the application in connection with either a violation of article 2 of the Aliens Employment Act (allowing an employee to work without a valid work permit or combined residence/work permit) or due to non- or insufficient payment of wage tax or national social security premiums.

**Employment contract with Dutch group company**

The ICT Directive does not apply to intra corporate transferees that enter into an employment contract directly with the Dutch group company. Such employees can still make use of the Highly Skilled Migrant program.



### **Limited duration of residence permit under ICT Directive**

The ICT Directive limits the duration of transfers to the Netherlands from outside the EU to three years for managers and specialists and to one year for trainees. Previous periods of residence in one or more other EU member states under the ICT Directive will be deducted from the maximum validity of the Dutch ICT combined residence/work permit.

To remain in the Netherlands after 3 years, the Dutch group company and the employee enter into an employment contract directly and then apply for a Highly Skilled Migrant combined residence/work permit, assuming the Dutch group company is a recognized sponsor for the purpose of labor.

### **EU-mobility throughout participating EU member states**

Under the ICT Directive, subject to certain conditions, an employee with an ICT combined residence/work permit can also be transferred to other group companies throughout the participating EU member states for a maximum of 90 days in a 180 day period. This only applies if the other EU member state has implemented the Directive as well. A notification to the authorities in the other EU member state is normally sufficient to allow the employee to start working there immediately under the ICT Directive. Local immigration authorities of the EU member state should be consulted prior to transferring the employee. For stays longer than 90 days in a 180 day period in another participating EU member state, the employee is required to submit a second application for a ICT combined residence/work permit in the relevant EU member state. The employee is allowed to keep the ICT combined residence/work permit from the first EU member state and can start working immediately after submitting his or her application in the second EU member state.

### **Decision time**

The IND may take up to a maximum of 90 days to decide on an ICT Directive combined residence/work permit application. If the Dutch group company is a recognized sponsor, the IND strives to make a decision on the application within 2 - 3 weeks. Please keep in mind that, depending on the employee's nationality, the employee may need a provisional residence permit (MVV) prior to travelling to the Netherlands where he or she will receive his or her ICT combined residence/work permit.

### **Fees**

The application for a combined residence/work permit under the ICT Directive must be submitted to the IND. The fees for this application are currently € 881,- (in 2017: € 910,-).

From: [redacted]  
 Sent: Friday, January 06, 2017 3:04 PM  
 To: [redacted]@belastingdienst.nl  
 Cc: [redacted] <[redacted]@nfia.com>  
 Subject: Follow up to 12/21/16 call/Dutch Customs, NFIA Nicopure Labs

Dear [redacted]

I hope you had a good holiday and are off to a good start in the New Year.

I am following up with you regarding a question that came up in our call last month with you and [redacted] of the NFIA.

The question was, if we were to have equipment/machinery delivered from the US or Canada to a bonded warehouse in the Netherlands and it was to remain in that bonded warehouse, would it be subject to duty?

Have you been able to find anything out about this?

Thanks.

Best Regards,

[redacted]  
 [redacted]  
 email: [redacted]@nicopure.com  
 tel: [redacted]

# nicopure labs



Attachment(s):

Filename	Size (bytes)
BLF - Memo re EU ICT Directive DEC16.pdf	406,154



## Message [REDACTED] Nicopure Labs

<b>From</b>	[REDACTED] ([REDACTED]@nfia.com)	<b>Date/Time (GMT)</b>	12 Jan 2018 00:42:52
<b>To</b>	[REDACTED] <[REDACTED]@rvo.nl>	<b>Cc</b>	[REDACTED] <[REDACTED]@nfia.com> [REDACTED] <[REDACTED]@rvo.nl> [REDACTED] <[REDACTED]@rvo.nl>
<b>Project</b>	Nicopure Labs		
<b>Subject</b>	NicoPure Labs - Confirmation letter received		
<b>Attachments</b>	No	<b>Flags</b>	Key Document

Hi [REDACTED]

I have just received the CL from Nicopure Labs / Syndicate Distribution BV. They will send over the actual form next week, but the numbers are all down here.

I believe I have updated the project file and the company file as well as I could. If there is anything else we have to add, let us know and we will get it done.

Regards, [REDACTED]

[REDACTED]  
Director**NETHERLANDS FOREIGN INVESTMENT AGENCY**

1175 Peachtree St NE | 100 Colony Square, Suite 1206 | Atlanta, GA 30361 | USA

E [REDACTED]@nfia.com O [REDACTED] C [REDACTED]

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**From:** [REDACTED] [mailto:[REDACTED]@nicopure.com]**Sent:** Thursday, January 11, 2018 6:21 PM**To:** [REDACTED] <[REDACTED]@nfia.com>**Subject:** RE: NicoPure Labs - Confirmation letter deadline

Hi [REDACTED]

Please see the completed table below. I should be able to follow up with the actual form sometime next week.

Best Regards,

[REDACTED]



**From:** [redacted] [mailto:[redacted]@nfia.com]  
**Sent:** Tuesday, January 09, 2018 10:06 AM  
**To:** [redacted] <[redacted]@nicopure.com>; [redacted] <[redacted]@nicopure.com>  
**Subject:** NicoPure Labs - Confirmation letter deadline  
**Importance:** High

Dear [redacted] dear [redacted]

My best wishes for 2018! I hope you are doing well.

We are closing our 'books' by the end of the week and would really appreciate if you would be able to return the signed confirmation letter (see attachment) to my be email.

See also the table below: a response on this email in which you confirm the numbers and fill in the missing would be enough for us right now.

<b>Name in the Netherlands:</b>	<b>Syndicate Distribution BV</b>
<b>Address:</b>	Maroestraat 14
<b>Postal code &amp; City:</b>	1060LG Amsterdam
<b>Telephone:</b>	[redacted]
<b>Contact in the Netherlands:</b>	[redacted]
<b>E-mail:</b>	[redacted]@nicopure.com
<b>Activity in the Netherlands:</b>	Distribution Center - Europe Headquarter - Europe Marketing & Sales - Europe
<b>Industry:</b>	Agri-Food - Tobacco (TS: Agro & Food)
<b>Products:</b>	e-liquid brands Halo, eVo, and Purity
<b>Employment Number of jobs initially:</b>	[redacted] FTE
<b>Expected number of jobs after 3 years:</b>	[redacted] FTE
<b>Investment in mln. Euros * Expected after 3 years:</b> <small>(*Investments necessary and directly attributable to the project (purchase or financial lease of land, business premises and permanent equipment) If buildings and/or equipment are rented (operational lease), you can take the accumulated rental costs for the first 5 years into account. Operational costs, such as labor cost and the company's capital deposits, do not qualify)</small>	[redacted] Euros

Looking forward to your reply! If there is anything else we can do for you, please let us know!

Kind regards, [redacted]

[redacted]  
Director

**NETHERLANDS FOREIGN INVESTMENT AGENCY**  
 1175 Peachtree St NE | 100 Colony Square, Suite 1206 | Atlanta, GA 30361 | USA  
 E [redacted]@nfia.com O [redacted] C [redacted]

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**From:** [REDACTED] [mailto:[REDACTED]@nicopure.com]  
**Sent:** Monday, August 7, 2017 2:27 PM  
**To:** [REDACTED] <[REDACTED]@nfia.com>; [REDACTED] <[REDACTED]@nicopure.com>  
**Subject:** RE: NicoPure Labs - Checking in + confirmation letter

Hi [REDACTED]

I have discussed with [REDACTED] Now waiting for [REDACTED] to review it.

Best Regards,

[REDACTED]

**From:** [REDACTED] [mailto:[REDACTED]@nfia.com]  
**Sent:** Monday, August 07, 2017 2:23 PM  
**To:** [REDACTED] <[REDACTED]@nicopure.com>; [REDACTED] <[REDACTED]@nicopure.com>  
**Subject:** RE: NicoPure Labs - Checking in + confirmation letter

Hi [REDACTED]

Did you get a chance to have a look at the confirmation letter?

Looking forward to your reply!

Kind regards, [REDACTED]

[REDACTED]

Director

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**Services:**

- Provide **benchmark information** on: labor quality, operational costs, regulations, infrastructure, quality of life, etc.
- Facilitate introductions to the Dutch **Tax, Customs, and Immigration Authorities**
- Offer intensive **personal guidance** on tax regulations, labor issues, and permit procedures
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- Provide consultation on: **site selection, supply chain structures, and 3PL selection**
- Act as **sparring partner** for the decision making team

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**From:** [REDACTED]  
**Sent:** Wednesday, July 5, 2017 4:52 PM  
**To:** [REDACTED] <[REDACTED]@nicopure.com>; [REDACTED] <[REDACTED]@nicopure.com>  
**Subject:** RE: NicoPure Labs - Checking in + confirmation letter

Hi [REDACTED]

I am glad to hear that things are going like they are supposed to. Let us know if you need any other assistance from our side. That's what we are here for.

Secondly, thanks in advance for reviewing and signing the confirmation letter.

Kind regards, [REDACTED]

[REDACTED]  
Director

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---

**From:** [REDACTED] [mailto:[REDACTED]@nicopure.com]  
**Sent:** Thursday, June 29, 2017 3:57 PM  
**To:** [REDACTED] <[REDACTED]@nfia.com>; [REDACTED] <[REDACTED]@nicopure.com>  
**Subject:** RE: NicoPure Labs - Checking in + confirmation letter

Hi [REDACTED]

Nice to hear from you. We are doing well and hope that you are too.

The Netherlands operation is coming together nicely and we are about to commence distribution from there.

I will review the confirmation letter again; we should be able to complete and return it soon.

Thanks for reaching out to us.

Best Regards,

[REDACTED]



**From:** [REDACTED] [mailto:[REDACTED]@nfia.com]  
**Sent:** Thursday, June 29, 2017 11:22 AM  
**To:** [REDACTED] <[REDACTED]@nicopure.com>; [REDACTED] <[REDACTED]@nicopure.com>  
**Subject:** NicoPure Labs - Checking in + confirmation letter

Hi [REDACTED] hi [REDACTED]

I hope you are doing well. How are things going in the Netherlands? Has it developed and picked up in the right direction?  
Let me know if we can be of any further assistance.

Also, did you have a chance to have a look at the confirmation letter? Would you be so kind to review it, sign it and send it back to us?

I am looking forward to your reply.

Kind regards, [REDACTED]

[REDACTED]  
Director

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office [REDACTED]  
mobile [REDACTED]  
[REDACTED]@nfia.com  
[www.twitter.com/nfia\\_USCanada](http://www.twitter.com/nfia_USCanada)

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1175 Peachtree Street  
100 Colony Square | Suite 1206  
Atlanta | GA | 30361 | USA



## Message [REDACTED] Nicopure Labs

<b>From</b>	[REDACTED] [REDACTED]@nfia.com)	<b>Date/Time (GMT)</b>	22 Jan 2018 20:23:25
<b>To</b>	[REDACTED] [REDACTED]@rvo.nl>	<b>Cc</b>	[REDACTED] [REDACTED]@rvo.nl>
<b>Project</b>	Nicopure Labs		
<b>Subject</b>	NicoPure Labs - Confirmation letter received - 'hard copy'		
<b>Attachments</b>	Yes (Click here to go there)		

**From:** [REDACTED]@nicopure.com]  
**Sent:** Friday, January 19, 2018 6:13 PM  
**To:** [REDACTED]@nfia.com>  
**Subject:** FW: NicoPure Labs - Confirmation letter deadline

Hi [REDACTED]

Please find attached the completed form referenced in the email below.

Best Regards,

[REDACTED]

Attachment(s):

Filename	Size (bytes)
NFIA.conf.doc.NicopureLabs.pdf	1,004,376





Please add missing information or changes below

## Nicopure Labs, LLC

Name in the Netherlands	Syndicate Distribution BV
Address	Maroestraat 14
Postal code & City	1060LG Amsterdam
Telephone	+ [REDACTED]

Contact in the Netherlands	[REDACTED]
E-mail	[REDACTED]@nicopure.com

Activity in the Netherlands	<input checked="" type="checkbox"/> Distribution Center - Europe <input checked="" type="checkbox"/> Headquarter - Europe <input checked="" type="checkbox"/> Marketing & Sales - Europe <input type="checkbox"/> Other:
Industry	Agri-Food - Tobacco (TS: Agro & Food)
Product(s)	e-liquid brands Halo, eVo, and Purity

Employment	Number of jobs initially:	[REDACTED]
	Expected number of jobs after 3 years:	[REDACTED]
Investment in mln. Euros *	Expected after 3 years:	[REDACTED] Euros (estimated)

\* Investments necessary and directly attributable to the project (purchase or financial lease of land, business premises and permanent equipment). If buildings and/or equipment are rented (operational lease), you can take the accumulated rental costs for the first 5 years into account. Operational costs, such as labor cost and the company's capital deposits, do not qualify.

On behalf of Nicopure Labs I declare that the information provided may be included in the annual list of the companies for which the Netherlands Foreign Investment Agency (NFIA) and Holland International Distribution Council (HIDC) have been active.

This information will be used for **INTERNAL PURPOSES ONLY** and will not be shared with others than representatives, unless otherwise required by Dutch law.

Signature

Date: January 19, 2018

Name: [REDACTED]

Title: [REDACTED]

This information will not be construed as a commitment or constitute an obligation in any form whatsoever.