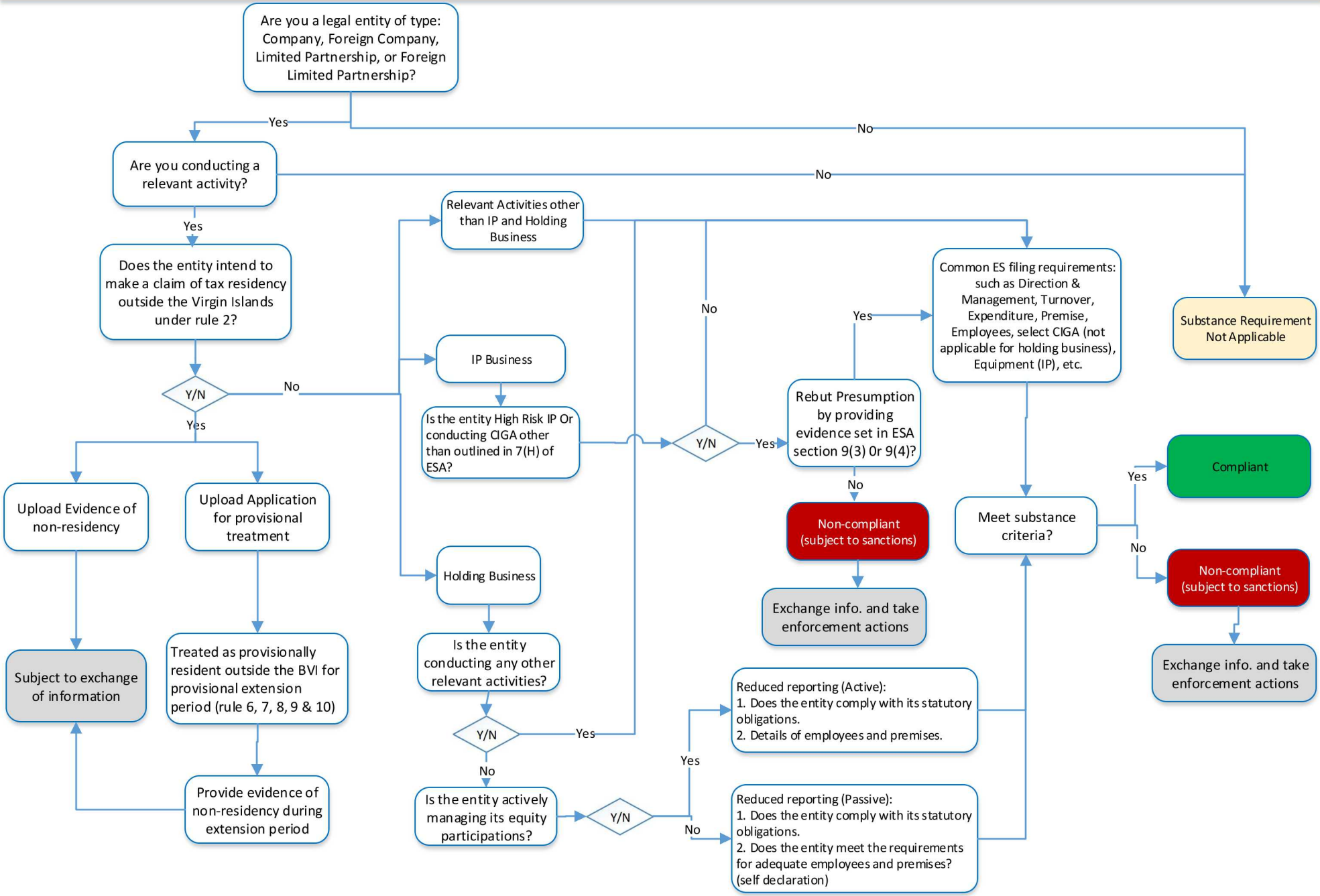BVI Economic Substance Decision Tree