REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

SN: MSLA - 0291 - 2020

CERTIFICATION

THIS IS TO CERTIFY that, on the basis of the representations and documents submitted, particularly the Master Securities Lending Agreement with **MSLA Ref. No.** [redacted] executed on **January 28, 2019**[1]**,** the original of which is attached hereto and made an integral part hereof, the borrowing and lending of securities within the borrowing period not exceeding two years, and the delivery of the collateral appurtenant thereto, are **not subject to capital gains tax (CGT), stock transaction tax and documentary stamp tax (DST).**

The said MSLA is executed by and between:

ABACUS SECURITIES CORPORATION (TIN: [redacted]) with business address at Unit 2904-A East Tower, PSE Centre, Exchange Road, Ortigas Center, Pasig City 1605, as the **LENDER**, represented herein by Melanio C. Dela Cruz and Sheila Marie C. Aguilar,

-and-

DEUTSCHE REGIS PARTNERS, INC. (TIN: [redacted] with business address at 23/F Tower One, Ayala Triangle, Ayala Avenue, 1226 Makati City, as the **BORROWER**, represented herein by Emmanuel O. Bautista and Mark Anthony P. Salvador.

The Lender/Agent and Borrower/Agent are required to submit bi-annual summary reports of outstanding and liquidated Securities Borrowing and Lending (SBL) Transactions and Stock Returns within the period provided for under Revenue Regulations (RR) No. 10-2006, as amended by RR No. 001-2008. Violation of this requirement shall subject the transaction to taxes imposed under Sections 24(C), 25(A)(3), 28(A)(7)(c), 28(B)(5)(c), 127(A) as applicable, and Section 175[2] of the National Internal Revenue Code of 1997, as amended. Moreover, the transaction shall also be subject to the penalties provided for under Sections 248 and 249 of the same Code, as implemented by the said regulations.

This Certification shall be valid unless sooner suspended, cancelled, or revoked by this Office for misrepresentation or for violations of the conditional requirements set forth in Sections 244 and 245 of the National Internal Revenue Code of 1997, as amended, and in RR No. 10-2006, as amended.

IN TESTIMONY WHEREOF, I have hereunto set my hand, this ____ day of JUN 02 2020 ____________, ________.

CAESAR R. DULAY
Commissioner of Internal Revenue

034120

Registration Fee of FIVE THOUSAND PESOS (P5,000.00) was paid on February 13, 2019 under Official Receipt No. OR2019-004823-000451

K-1-LMAT

[1] Acknowledged on February 01, 2019

[2] As a result of the amendments introduced by Republic Act (RA) No. 9243, Section 176 was amended and renumbered to Section 175.