REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
BCL-CP-468-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **UNISYS MANAGED SERVICES CORPORATION (UMSC)**, with Taxpayer Identification Number (TIN) is exempt from income tax and creditable withholding tax on its income received directly in connection with its Public Private Partnership Project, **Civil Registry System – Information Technology Project Phase 2 (CRS-ITP2)** that shall be based only on the share of UMSC on the user fees generated by the CRS-ITP2., located at Philippine Statistics Authority Complex, East Ave., Diliman, Quezon City, a project duly registered with the Board of Investments (BOI) under Certificate of Registration No. 2018-135 dated June 28, 2018, for a period of **four (4) years** beginning from **January 2022**[1] or actual start of commercial operations, whichever is earlier, but in no case earlier than the date of registration of the project with the BOI, pursuant to Executive Order (EO) No. 226, otherwise known as the "Omnibus Investments Code of 1987" and Section 2.57.5 (B) (2) of Revenue Regulations (RR) No. 2-98, as amended.

The grant of tax exemption herein is subject to the compliance with the provisions of applicable BIR rules and regulations and the Terms and Conditions stated at the back hereof. The Company is liable, however, for all other applicable taxes not discussed above.

This Certificate of Tax Exemption is being issued on the basis of the facts and documents as represented and submitted. However, if upon investigation, the BIR ascertains that the facts are different, then this Certificate shall be considered null and void.

Issued this _____ day of DEC 14 2021, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-LMAT

017761

---

[1] The ManCom and Board, in its meeting of April 08, 2021 through Resolution No. 12-11, Series of 2021, **APPROVED** the firm's request for the movement of start of commercial operations (SCO) and ITH reckoning date from January 2019 to January 2022 pursuant to paragraph 1 (b) of Board Resolution No. 10-03, Series of 2020 and move the Income Tax Holiday (ITH) incentive reckoning date corresponding to the duration that the pre-operation activities have been affected or disrupted.

TERMS AND CONDITIONS
OF THE CERTIFICATE OF TAX EXEMPTION

1. The revenues qualified for ITH are only income directly attributable to the revenue generated from the registered PPP Project, **[Civil Registry System – Information Technology Project Phase 2 (CRS-ITP2)]**, located at Philippine Statistics Authority Complex, East Ave., Diliman, Quezon City, that shall be based only on the UMSC share on the user fees generated by the CRS-ITP2.

2. The Company shall observe the following timetable:

Activity	Schedule
Obtaining licenses, permits, registration	January 2017
Project site preparation and development	
Building construction	February 2017 – December 2018
Other expenses (Outlet Facilities)	
- Completion of 40 outlets - Completion of additional 40 outlets	December 2018 December 2020
Acquisition and installation of machinery & equipment	December 2018
Hiring and training of employees	March 2017
Start of commercial operation	January 2022

3. The Company's entitlement to ITH for its BOI-registered project is subject to the compliance with the provisions of the Specific Terms and Conditions of its BOI Registration.

4. Pursuant to Section 4 of Republic Act (RA) No. 10708[2], the Company is required to file its tax returns and pay its tax liabilities, on or before the deadline as provided under the National Internal Revenue Code (Tax Code) of 1997, as amended, using the electronic system for filing and payment of taxes of the BIR. It shall file with BOI a complete annual tax incentives report of its income-based tax incentives, VAT and duty exemptions, deductions, credits or exclusions from the tax base, as may be provided under EO No. 226, within the periods prescribed under RA No. 10708's Implementing Rules and Regulations and Joint Memorandum Circular No. 1-2016 dated September 1, 2016.

5. The Company shall be constituted as a withholding agent for the government if it acts as employer and any of its employees received compensation income subject to compensation withholding tax, or if it makes payments to individuals or corporations subject to the withholding taxes as source as required under Chapter XIII and Section 57 of the Tax Code of 1997, as amended, and implemented by RR No. 2-98, as amended.

6. The Company is required to file on or before the 15th day of the fourth month following the close of its accounting period of a Profit and Loss Statement and Balance Sheet with the Annual Information Return under oath, stating its gross income and expenses incurred during the taxable year.

7. Finally, the Company's books of accounts and other pertinent records shall be subject to periodic examination by revenue enforcement officers of this Bureau for the purpose of ascertaining whether it is complying with the conditions under which it has been granted tax exemption or tax incentives and its tax liability, if any, pursuant to Section 235 of the Tax Code of 1997, as amended.

---

[2] An Act Enhancing Transparency in the Management and Accounting of Tax Incentives Administered by Investment Promotion Agencies.