REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
316-2017

CERTIFICATE OF TAX EXEMPTION

issued to

INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.

26/F Ayala Life-FGU Ctr., Ayala Avenue, Makati City
TIN
SEC Company Reg. No.

This certifies that the above-named corporation is a non-stock, non-profit corporation and has proven by actual operation that its primary purpose falls under Section 30(F) of the National Internal Revenue Code of 1997, as amended. It is exempt from INCOME TAX only on the following revenues or receipts:

1. **Annual Dues;**
2. **Member's contribution.**

----------------------nothing follows----------------------

subject to the provisions of applicable BIR rules and regulations and the tax exemptions, liabilities and responsibilities stated in the Terms and Conditions hereto attached and made an integral part hereof. It is liable, however, to all other taxes not enumerated above.

This certification shall be valid for three (3) years from the date of issuance unless earlier revoked by this Office for violation of any provisions of applicable rules and regulations of BIR, or the terms and conditions herein set forth.

This Certificate may be renewed upon filing of a subsequent application for revalidation provided under Revenue Memorandum Order (RMO) No. 20-2013. Failure to renew this Certificate shall be deemed a revocation thereof upon the expiration of the three (3)-year period.

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 JUN 14 2017, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1-JRC

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CTE No. 316-2017
Date issued 6-14-2017

TERMS AND CONDITIONS OF THE CERTIFICATE OF TAX EXEMPTION

TAX EXEMPTION

1) **INCOME TAX. INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.** is only exempt from the payment of income tax on revenues and receipts enumerated on the Certificate of Tax Exemption. Moreover, to be entitled to the tax exemptions enumerated herein, the association/corporation/ organization must continue to meet the requirements set forth under Revenue Memorandum Order No. 20-2013.

LIABILITY FOR INTERNAL REVENUE TAXES

1) INCOME TAX

INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC. is subject to income tax on all its income/receipts/revenues **not** expressly exempted and stated in the Certificate of Tax Exemption. Moreover, it is subject to the corresponding internal revenue taxes imposed under the NIRC on its income derived from any of its properties, real or personal, or any activity conducted for profit regardless of the disposition thereof, which income should be returned for taxation.

Likewise, interest income from currency bank deposits and yield or any other monetary benefits from deposit substitute instruments and from trust funds and similar arrangements, and royalties derived from sources within the Philippines are subject to the twenty percent (20%) final withholding tax: Provided, however, that interest income derived by it from a depository bank under the expanded foreign currency deposit system shall be subject to seven and one-half percent (7-1/2%) final withholding income tax pursuant to Section 27(D)(1) in relation to Sec. 57(A) both of the NIRC.

It must be noted that INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.'s income derived from seminar and conference and rent income is subject to 30% pursuant to the last paragraph of Sec. 30 of the NIRC.

Interest income or yield from investments is subject to applicable final withholding tax rates under the pertinent provisions of NIRC.

2) Donations are subject to donor's tax under Section 99(B) of the NIRC considering that **INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.** is not one of the corporations whose income from donations is exempt from donor's tax under Sections 101 2(A)(3) and (B)(2) of the NIRC

3) VALUE ADDED TAX

If **INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.** is engaged in the sale of goods or services in the course of a business pursuit, including transactions incidental thereto, in general, it shall be liable for VAT on the revenues derived therefrom.

Notwithstanding that it is a non-stock, non-profit corporation, its purchase of goods or properties or services and importation of goods shall nevertheless be subject to the 12% VAT pursuant to Sections 106 and 107 of the NIRC.

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4) WITHHOLDING TAX

INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC. shall be constituted as withholding agent for the government if it acts as an employer and its employees receive compensation income subject to the withholding tax under Section 79 (A), Chapter XIII, Title II of the NIRC, as implemented by Revenue Regulations No. 2-98, as amended, or if it makes income payments to individuals or corporations subject to the withholding tax pursuant to Section 57 of the NIRC, as implemented by Revenue Regulations No. 2-98, as amended.

TAXPAYER'S DUTIES & RESPONSIBILITIES

1) **INSURANCE INSTITUTE FOR ASIA AND THE PACIFIC, INC.** is required to file on or before the 15th day of the fourth month following the end of the accounting period a Profit and Loss Statement and Balance Sheet with the Annual Information Return under oath, stating its gross income and expenses incurred during the preceding period and a certificate showing that there has not been any change in its By-laws, Articles of Incorporation, manner of operation and activities as well as sources and disposition of income. Copy of this Certificate of Tax Exemption shall be attached to the aforementioned Annual Information Return.

2) Under Section 235 of the NIRC, any provision of existing general and special law to the contrary notwithstanding, the books of accounts and other pertinent records of tax-exempt organization or grantees of tax incentives shall be subject to examination by the BIR for purposes of ascertaining compliance with the conditions under which it has been granted tax exemptions or tax incentives, and its tax liabilities, if any.

3) Further, it is also required under Section 6(C) in relation to Section 237 of the NIRC to issue duly registered receipts or sales or commercial invoices for each sale or transfer of merchandise or for services rendered which are not directly related to the activities for which the Association is registered. (Revenue Memorandum Circular No. [RMC] No. 76-2003).

4) Finally, it is subject to the payment of registration fee of PhP 500.00 as prescribed in Section 236(B) of the NIRC. WS