



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

Certificate of Tax Exemption No.
352-2017

CERTIFICATE OF TAX EXEMPTION
issued to

PHILIPPINE NATIONAL OIL COMPANY

PNOC Bldg. VI, Energy Center Rizal Drive, Bonifacio Global City, Fort Bonifacio, Taguig City 1630
TIN:

This certifies that the Deeds of Donation dated March 10, 2017 executed by
PHILIPPINE NATIONAL OIL COMPANY in favor of:

Name of Donee	TIN	Address
Philippine Navy		Headquarters Philippine Navy 2335, Roxas Boulevard, Malate, Manila 1004

covering the following vessels/tankers described below, to wit;

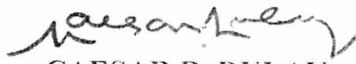
Vessel's Name	MT PNOC Emilio Jacinto	MT PNOC Lapu-Lapu	MT Dr. Jose P. Rizal
Length	83.23 meters	95.09 meters	93.01 meters
Breadth	13.80 meters	15.60 meters	13.50 meters
Depth	7.28 meters	7.40 meters	6.35 meters
Gross Tonnage	2526 MT	2,963.00 MT	2230 MT
Net Tonnage	1288 MT	1,425.00 MT	1190 MT
Hull Construction	Steel/Double Hull	Double-Hulled	Steel/Double Hull
Engine Make	Yanmar Diesel Engine	Daihatsu	Wusi Sida Diesel Engine
Year Built	2007	2007	2003

being gifts in favor of the Philippine Navy, a naval service branch of the Armed Forces of the Philippines, are exempt from the payment of the donor's tax pursuant to Section 101 (A)(2) of the Tax Code of 1997, as amended.

Accordingly, the Deeds of Donation are likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code of 1997, as amended. However, the acknowledgements of the Deeds of Donation before a notary public are subject to the documentary stamp tax of P15.00 imposed under Section 188 of the same Code.

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 AUG 08 2017.


CAESAR R. DULAY
Commissioner of Internal Revenue