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

Certificate of Tax Exemption No.
638-2017

CERTIFICATE OF TAX EXEMPTION
issued to

PHILIPPINE INSTITUTE OF PETROLEUM, INC.
19/F Trafalgar Plaza, 105 Plaza H.V. Dela Costa St., Salcedo Village, Makati City 1227
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. **Membership dues.**

---------------------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 DEC 19 2017.

CAESAR R. DULAY
Commissioner of Internal Revenue

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CTE No. 638-2017
Date issued 12-19-2017

TERMS AND CONDITIONS OF THE CERTIFICATE OF TAX EXEMPTION

TAX EXEMPTION

1) **INCOME TAX. PHILIPPINE INSTITUTE OF PETROLEUM, 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

PHILIPPINE INSTITUTE OF PETROLEUM, 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.

2) VALUE ADDED TAX

If **PHILIPPINE INSTITUTE OF PETROLEUM, 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.

3) WITHHOLDING TAX

PHILIPPINE INSTITUTE OF PETROLEUM, 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.