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

Certificate of Tax Exemption No:
EO-CP-156-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **ORMIN POWER, INC.**, with Taxpayer Identification Number , is exempt from income tax and creditable withholding tax on its income received directly in connection with its power plant project, **Renewable Energy Developer of 10 MW Inabasan Hydroelectric Power Plant**, located in the Municipality of San Teodoro, Oriental Mindoro, a project duly registered with the Board of Investments (BOI) under Registration No. 2013-225 dated December 04, 2013, for a period of 7 years beginning from **April 2016** 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 Income Tax Holiday (ITH) shall be limited only to the revenues generated from the sales of electricity from the 10 MW Inabasan Hydroelectric Power Plant. Only revenues derived from power generated and sold to grid, other entities and/or communities shall be entitled to ITH.

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, to 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 APR 21 2021, _____.

LARRY M. BARCELO
Assistant Commissioner
Legal Service
000569

K-1-JAC

CTE No. BOI-CP-136-2021
Date issued APR 21 2021

TERMS AND CONDITIONS OF THE CERTIFICATE OF TAX EXEMPTION

1. The exemption from income and creditable withholding taxes covers only income directly attributable to the revenues generated from the sales of electricity from the **10 MW Inabasan Hydroelectric Power Plant**, and only revenues derived from power generated and sold to grid, other entities and/or communities shall be entitled to ITH.

2. The Company shall observe the following production and sales schedule:

Year	1	2	3	4	5
No. Turbines	3	3	3	3	3
Capacity (MW)	3.333	3.333	3.333	3.333	3.333
Total Rated Capacity (MW)	10	10	10	10	10
Operating Hours	7,300	7,300	7,300	7,300	7,300
Capacity Utilization (Plant Factor)	86%	86%	86%	86%	86%
Sales Volume (kwh)	75,204,000	75,204,000	75,204,000	75,204,000	75,204,000
Selling Price (Php/kwh)	5.60	5.60	5.60	5.60	5.60
Sales Value (PhP'000)	421,142.40	421,142.40	421,142.40	421,142.40	421,142.40

3. The Company's entitlement to ITH for its BOI-registered power plant 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[1], 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 of 1997 (Tax Code), 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 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, 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, as amended.

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