January 10, 2019

CERTIFICATE OF TAX EXEMPTION NO. 062-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **KOOLL COMPANY, INC.**, with Tax Identification Number 000-000-000-000, is exempt from income tax and creditable withholding tax on revenues generated from the sales of Bio-Ethanol (Fuel Grade), directly in connection with its renewable energy project, **Fuel Bio-Ethanol Plant with Cane Molasses as Feedstock**, located at Brgy. Bubog, Talisay City, Negros Occidental, a project duly registered with the Board of Investments (BOI) under Registration No. 2016-063 dated March 30, 2016, for a period of 7 years beginning from **March 30, 2016**, [1] pursuant to Executive Order No. 226, otherwise known as the "Omnibus Investments Code of 1987" and Section 2.57.5 (B) (2) of Revenue Regulations No. 2-98, as amended.

The Income Tax Holiday (ITH) does not cover revenues from the sales of potable alcohol (Ethyl Alcohol/Rectified Alcohol Spirit or Hydrous Alcohol), cosmetic/medical grade non-potable alcohol and carbon dioxide (CO2).

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 enumerated 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 10th day of January, 2019.

(SGD.) CAESAR R. DULAY
Commissioner of Internal Revenue

ATTACHMENT

TERMS AND CONDITIONS
OF THE CERTIFICATE OF TAX EXEMPTION

Copyright 2020 CD Technologies Asia, Inc.

1. The exemption from income and creditable withholding taxes covers only income directly attributable to the revenues generated from the sales of **Bio-ethanol**.

2. The Company is obligated to comply based on the following schedules/sales revenues:

Year	Production/Sales Volumes in liters	Selling Price (PhP/liter)	Sales Value (PhP' Million)
1	_____	_____	_____
2	_____	_____	_____
3	_____	_____	_____
4	_____	_____	_____
5	_____	_____	_____

3. The ITH shall be limited only to the revenues generated from the sales of **Bio-ethanol**. Revenues derived from the sales of potable alcohol (Ethyl Alcohol/Rectified Alcohol Spirit or hydrous Alcohol), cosmetic/medical grade non-potable alcohol and carbon dioxide (CO2), shall not be entitled to ITH.

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

5. 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 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 E.O. 226, within thirty (30) days from the deadline for filing of tax returns and payment of taxes.

6. 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 *Revenue Regulations (RR) No. 2-98*, as amended.

7. 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.

8. 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

Copyright 2020 CD Technologies Asia, Inc.

of 1997, as amended.

Footnotes

1. Certificate of Income Tax Holiday Entitlement No. 2017-000668.
2. Note from the Publisher: Copied verbatim from the official copy. Missing footnote text.

Copyright 2020 CD Technologies Asia, Inc.