March 8, 2018

CERTIFICATE OF TAX EXEMPTION NO. 350-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **TANTUCO ENTEPRISES, INC.**, with Tax Identification Number 000-000-000-000, is exempt from income tax and creditable withholding tax on its income received directly in connection with its production of **36M Liters of BIOFUEL (COCO-METHYL ESTER), 4M Liters of GLYCERIN, 1.7M Liters of COCO FATTY ACID DISTILLATE (CFAD) and 23.08M kilogram of COPRA CAKE**, a project duly registered with the Board of Investments (BOI) under Registration No. 2009-026 dated March 2, 2009, for a period of **6** years beginning from **February 2009** [1] or actual start of commercial operations/selling, whichever is earlier, but in no case earlier than the date of registration of the project with the BOI, 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 (RR) No. 2-98, as amended.

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, for 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 8th day of March, 2018.

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

ATTACHMENT

TERMS AND CONDITIONS

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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 production of **36M Liters of BIOFUEL (COCO-METHYL ESTER), 4M Liters of GLYCERIN, 1.7M Liters of COCO FATTY ACID DISTILLATE (CFAD) and 23.08M kilogram of COPRA CAKE**.

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

Year	Coco-Methyl Ester (CME)		Glycerin	
	Production (In '000 Liters)	Sales (In '000 Php)	Production (In '000 Liters)	Sales (In '000 Php)
1	18,000	_____	2,000	_____
2	18,000	_____	2,000	_____
3	36,000	_____	4,000	_____
4	36,000	_____	4,000	_____
5	36,000	_____	4,000	_____

Year	Copra Cake		Coco-Fatty Acid Distillate (CFAD)	
	Production (In '000 Kg.)	Sales (In '000 Php)	Production (In '000 Liters)	Sales (In '000 Php)
1	11,040	_____	850	_____
2	11,040	_____	850	_____
3	22,080	_____	1,700	_____
4	22,080	_____	1,700	_____
5	22,080	_____	1,700	_____

3. The Company's entitlement to ITH for its BOI-registered activity 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, [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 the periods prescribed under R.A. 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

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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.

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 of 1997, as amended.

Footnotes

1. The Company was granted a bonus ITH year for its registered activity for the period March 2, 2015 to March 1, 2016 per BOI letter dated May 26, 2014.
2. An Act Enhancing Transparency in the Management and Accounting of Tax Incentives Administered by Investment Promotion Agencies.

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