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

Certificate of Tax Exemption No: 356-2018

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **DATA LAND INC.,** with Tax Identification Number is exempt from income tax and creditable withholding tax on its income directly attributable to the revenue generated from tourism-related activities of the registered project, **Best Western The Ivy Wall Hotel**, Rizal Avenue, Barangay Bancao Bancao, Puerto Princesa City, Palawan, a project duly registered with the Board of Investments (BOI) under Registration No. dated October 6, 2015, on a non-pioneer status as a New Operator of Hotel for a period of four (**4**) years beginning from **January 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 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 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 day of MAR 08 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue

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