

SPECIAL ATTACHMENT

ANNUAL INCOME TAX RETURN FOR CORPORATE

FOR TAXABLE YEAR [][][][]

STATEMENT OF TRANSACTION IN RELATED PARTIES

TIN : [][][] [][][][] [][][][] [] [][][][] [][][][]

TAXPAYER'S NAME/PERMANENT ESTABLISHMENT : []

1 DOCUMENTATION OF ARM'S LENGTH TRANSACTION DETERMINATION
These are some particular notes that we made to support the fact that transactions that have been made with related parties are in accordance with the arm's length principle and the common practice.

1 Concerning of company's description in detail
That we have made note about :

- Yes No
Ownership structure that refer to the dependability between all company in one group of multinational company.
Organizational structure of Taxpayer Company.
Operating aspects of Taxpayers business operations including details of functions which is delivered by units in the Taxpayers organization.
Description of Business Environment in detail.

2 Concerning of Transaction
That we have made note about :

- Yes No
Transaction with related parties
Taxpayer's transaction with company which is not influenced by related parties or information about comparing transaction.
In case of tax payers act as the selling, rendering, or borrowing party as mentioned on the above transactions, we have conducted records as follows :
- Pricing Policy and price list for the last 5 (five) years.
- Details of manufacturing cost or acquisition cost or service preparation cost.

3 Concerning of Comparison Analysis Result Notes
That we have made note about :

- Yes No
Characteristic of product (goods, service, loans, finance instrument, etc) which has been transacted.
Functional analysis which is the primary consideration of tax payers' transactions with related parties companies, all risks assumed and assets are being used in those transactions.
The economic conditions when the transactions is happened.
Terms of transactions, including agreement between Taxpayers with related parties from foreign countries
Taxpayer business strategy at the time when carry out the affiliation transaction

4 Concerning of determination of Fair Price
That we have made note about :

- Yes No
Methodology of price determination which applicable by Taxpayer, which shows how the fair price is acquired, and the reasons why this method is chosen, compared to other methods.
Comparing data used by the Taxpayer to determine of transfer price.
The application of the determination methodology of transfer price and the use of comparing data in the determination of transfer price.

TAXPAYER/AUTHORIZED REPRESENTATIVE

