

SPECIAL ATTACHMENT
ANNUAL INCOME TAX RETURN FOR CORPORATE
 FOR TAXABLE YEAR
STATEMENT OF TRANSACTION IN RELATED PARTIES

3A-1

T I N :

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 | |
| <input type="checkbox"/> | <input type="checkbox"/> | Ownership structure that refer to the dependability between all company in one group of multinational company. |
| <input type="checkbox"/> | <input type="checkbox"/> | Organizational structure of Taxpayer Company. |
| <input type="checkbox"/> | <input type="checkbox"/> | Operating aspects of Taxpayers business operations including details of functions which is delivered by units in the Taxpayers organization. |
| <input type="checkbox"/> | <input type="checkbox"/> | Description of Business Environment in detail. |

2 Concerning of Transaction
 That we have made note about :

- | | | |
|--------------------------|--------------------------|--|
| Yes | No | |
| <input type="checkbox"/> | <input type="checkbox"/> | Transaction with related parties |
| <input type="checkbox"/> | <input type="checkbox"/> | Taxpayer's transaction with company which is not influenced by related parties or information about comparing transaction. |
| <input type="checkbox"/> | <input type="checkbox"/> | 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 | |
| <input type="checkbox"/> | <input type="checkbox"/> | Characteristic of product (goods, service, loans, finance instrument, etc) which has been transacted. |
| <input type="checkbox"/> | <input type="checkbox"/> | 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. |
| <input type="checkbox"/> | <input type="checkbox"/> | The economic conditions when the transactions is happened. |
| <input type="checkbox"/> | <input type="checkbox"/> | Terms of transactions, including agreement between Taxpayers with related parties from foreign countries |
| <input type="checkbox"/> | <input type="checkbox"/> | 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 | |
| <input type="checkbox"/> | <input type="checkbox"/> | 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. |
| <input type="checkbox"/> | <input type="checkbox"/> | Comparing data used by the Taxpayer to determine of transfer price. |
| <input type="checkbox"/> | <input type="checkbox"/> | The application of the determination methodology of transfer price and the use of comparing data in the determination of transfer price. |

.....
TAXPAYER/AUTHORIZED REPRESENTATIVE

