

FOR CORPORATION PERMITTED TO MAINTAIN BOOKKEEPING IN ENGLISH  
LANGUAGE AND US DOLLAR CURRENCY

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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.

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

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                      Organizational structure of Taxpayer Company.

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☐ ☐ Description of Business Environment in detail.

Concerning of Transaction  
That we have made note about :

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☐ ☐ Transaction with related parties

☐ ☐ Taxpayer's transaction with company which is not influenced by related parties or information about comparing transaction.

☐ ☐ In case, Taxpayers act as the selling, rendering, or borrowing party in 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.

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

11/11/2019

☐ ☐ Characteristic of product (goods, service, loans, finance instrument, etc) which has been transacted.

☐ ☐ Functional analysis which is the primary consideration of Taxpayers' transactions with related parties companies, all risks assumed and assets are being used in those transactions

☐ ☐ The economic conditions when transactions happened.

		Terms of transactions, including agreement between Taxpayers with related parties from foreign countries
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☐ ☐ Taxpayer business strategy at the time when carry out the affiliation transaction

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

10/10

☐ ☐ 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.

☐ ☐ Comparator 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