

ADVISORY TO STOCKHOLDERS
Guidelines for Cash Dividends Distribution

Notice is hereby given to all stockholders of SFA Semicon Philippines Corporation (“SSP” or the “Company”) as of **March 18, 2022** (“Record Date”) on the following guidelines for the distribution of cash dividends declared at the meeting of the Board of Directors on February 18, 2022 in the amount of US\$2,547,049 (or a dividend per share of US\$0.00118), out of the Company’s unrestricted retained earnings based on the Corporation’s financial statements as of December 31, 2021, in favor of all of the Company’s stockholders of record as of the record date of **March 18, 2022**, in proportion to, and on the basis of, the outstanding shares of stock of the Company respectively held by them. The cash dividends shall be paid on **April 8, 2022**. The dividends of local stockholders will be paid in Philippine Peso and in determining the Peso equivalent of the dividend payment, the prevailing Peso: Dollar exchange rate on the record date of **March 18, 2022**, will be used.

1. Prescribed Final Withholding Tax Rates

The Dividends to be distributed to the stockholders not covered by tax exemptions and tax treaty relief applications will be subject to the following final withholding tax rates prescribed under the National Internal Revenue Code (“NIRC”):

| Taxpayer Classification | Final Withholding Tax Rate |
|---|--|
| Individual citizen | Ten percent (10%) |
| Individual resident alien | Ten percent (10%) |
| Non-resident alien individual | a. If engaged in trade or business - Twenty percent (20%) b. If not engaged in trade or business - Twenty-five percent (25%) |
| Domestic corporation | Not subject to tax |
| Resident foreign corporation | Not subject to tax |
| Non-resident foreign corporation (“NRFC”) | a. Twenty-Five percent (25%) b. If current BIR rulings or jurisprudence indicate that the tax sparing requirement under Section 28(B)(5)(b), NIRC, is complied with, i.e., that the country of residence of the NRFC allows a deemed paid tax credit of ten percent (10%) on taxes due from the NRFC or does not tax the Philippine-sourced dividends - Fifteen percent (15%) |

In the case of stockholders whose shares are lodged with the Philippine Depository and Trust Corporation or PDTC (formerly, PCD), whether individuals or non-individuals, resident or non-resident, their respective custodians/brokers shall submit to the Company a notarized alphabetical list of beneficial owners as of **March 18, 2022** in the form of **Schedule A** hereof, containing the following information:

- a. Name of client beneficial owner (Last Name, First Name, Middle Name for individuals; Complete name for non-individuals)*
- b. Tax Identification Number (TIN)*
- c. Address of client beneficial owner*
- d. Status (Residence/Nationality)*
- e. Total shareholding in the Company*
- f. Client account code*
- g. Broker code*
- h. Birth Date (for individuals)/Registration Number and Date of Registration (for non-individuals)*

The alphabetical list shall be certified true and correct by the custodian's/broker's President and Head of Settlements, duly notarized, and submitted to the Company on or before **March 24, 2022, 4:00 p.m. (Manila Time)**. The custodian/broker shall ensure that the alphabetical list are consistent with the respective balances as reflected in the PDTC alphabetical list of depository account holders and corresponding total shareholdings submitted by PDTC to the Company.

2. Submission of Documentary Requirements

Shareholders claiming entitlement to tax exemptions or preferential tax rates on dividend income are required to submit the tax documentary requirements no later than **March 24, 2022** by mail and advance scanned copies of all documents by e-mail.

Mail to the following address:

SFA Semicon Philippines Corporation
Panday Pira Ave., Corner Side Road, Clark Freeport Zone, Pampanga

Attention: **Ms. Caroline S. Sicat – Compliance Officer/ Assistant Corporate Secretary/ Treasurer**

E-mail to the following e-mail address:

ssp.ir@sfasemicon.com

3. Availment of Tax Relief under Tax Treaties for Corporate or Individual Shareholders

The following documents, in accordance with the BIR Revenue Memorandum (RMO) No. 14-2021 and Revenue Memorandum Circular No. (RMC) 77-2021, are required of corporate or individual shareholders claiming entitlement to the preferential tax rate on dividend income under a tax treaty relief with the Republic of the Philippines, for submission no later than **March 24, 2022**.

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|-------------------------------------|--|----------------------------|-------------------|
| | | With | Without Documents |
| Non-Resident Foreign Corporation or | 1. BIR form 1901-D with the necessary information, including | Applicable tax treaty rate | 25% |

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|--|--|----------------------|-------------------|
| | | With | Without Documents |
| Individual availing of tax treaty relief | <p>the Philippine TIN of the nonresident;</p> <ol style="list-style-type: none"> 2. Authenticated/apostilled Tax Residency Certificate (TRC) for the relevant period, duly issued by the taxing authority of the foreign country in which the income recipient is a resident; 3. If a corporation - Authenticated/apostilled copy of the nonresident legal person's Articles of Incorporation confirming its incorporation, with an English translation thereof in a foreign language; 4. Original Copy of the Certificate of Non-Registration of Company or Certified True copy of license to do business in the Philippines duly issued by the Securities and Exchange Commission ("SEC") or original copy of the Certificate of Business Registration/Presence duly issued by the Department of Trade and Industry ("DTI") for individuals; 5. Proof that the shareholding in respect of which the dividends are paid is not effectively connected with the permanent establishment ("PE") of the foreign enterprise in the Philippines, if it has a PE in the Philippines; 6. Duly executed indemnity letter attached as Schedule A, which must be notarized (if signed in the Philippines; consularized (if signed outside the Philippines in a country that is not a party to the Apostille Convention); or apostilled (if signed outside the Philippines in a country that is a party to the Apostille Convention); 7. If the stockholder is a corporation or a juridical entity, proof of authority of the Stockholder and the stockholder's authorized | | |

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|-------------------------|---|----------------------|-------------------|
| | | With | Without Documents |
| | <p>representative, if any, to sign the indemnity letter.</p> <p>8. For fiscally transparent entities:</p> <p>a. <i>A copy of the law of the foreign country showing that tax is imposed on the owners or beneficiaries of the foreign fiscally transparent entity;</i></p> <p>b. <i>List of owners/beneficiaries of the foreign entity;</i></p> <p>c. <i>Proof of ownership of the foreign entity; and</i></p> <p>d. <i>TRC duly issued by the concerned foreign tax authority to the owners or beneficiaries of the fiscally transparent entity.</i></p> | | |

Upon submission of the documents above, the Claiming Stockholder shall be entitled to avail of the preferential tax rate.

If the Claiming Stockholder is unable to submit the document within the date and time prescribed, SSP will withhold and remit the taxes at the applicable regular withholding tax rates under the NIRC.

4. Availment of Tax Relief under Tax Sparing for Corporate Shareholders

The following documents are required of non-resident foreign corporate shareholders claiming entitlement to the lower tax rate of 15% in accordance with the tax sparing provisions of the NIRC for submission no later than **March 24, 2022**.

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|---|--|---|-------------------|
| | | With | Without Documents |
| Non-Resident Foreign Corporation availing of tax sparing under the tax code | <p>1. Original copy of the apostilled / duly authenticated TRC issued by the country of domicile;</p> <p>2. Apostilled/duly authenticated copy of the NRFC's Articles of Incorporation or proof of establishment in its country of residence;</p> <p>3.1. If the dividend is taxable in the country of domicile:</p> <p>a. Duly authenticated or apostilled copy of the law of the country of domicile allowing a tax credit for taxes actually paid in the Philippines and for taxes deemed paid in the Philippines equivalent to at least 10%; and</p> | 15% under tax sparing provision of the NIRC | 25% |

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|-------------------------|---|----------------------|-------------------|
| | | With | Without Documents |
| | <p>b. Duly authenticated or apostilled copy of any document issued by, or filed with, the foreign tax authority showing the amount of deemed paid tax credit actually granted by the foreign tax authority.</p> <p>3.2. If the dividend is exempt from tax in the country of domicile:</p> <p>a. A duly authenticated or apostilled copy of the law of the country of domicile; and</p> <p>b. A duly authenticated or apostilled copy of any document issued by the foreign tax authority confirming that the NRFC is exempt from income tax on dividends received from the Philippine corporation.</p> <p>4. Duly executed indemnity letter attached as Schedule B which includes an undertaking to file an RFC. The indemnity letter must be notarized (if signed in the Philippines; consularized (if signed outside the Philippines in a country that is not a party to the Apostille Convention); or apostilled (if signed outside the Philippines in a country that is a party to the Apostille Convention);</p> <p>5. If the stockholder is a corporation or a juridical entity, proof of authority of the Stockholder and the stockholder's authorized representative, if any, to sign the indemnity letter.</p> | | |

Upon submission of the documents above, the Claiming Stockholder shall be entitled to avail of the preferential tax rate.

If the Claiming Stockholder is unable to submit the document within the date and time prescribed, SSP will withhold and remit the taxes at the applicable regular withholding tax rates under the NIRC.

5. Availment of Tax Relief under Tax Exemption

Shareholders claiming tax relief under tax exemption are required to submit the following supporting documents no later than March 24, 2022.

| Taxpayer Classification | Supporting Documents Required | Withholding Tax Rate | |
|-------------------------------------|---|----------------------|----------------------------------|
| | | With | Without Documents |
| Taxpayers availing of tax exemption | <ol style="list-style-type: none">1. BIR ruling – Certified current, valid and must cover the pay-out of cash dividends for which it is being submitted as supporting document;2. Duly executed indemnity letter attached as Schedule C, which must be notarized (if signed in the Philippines; consularized (if signed outside the Philippines in a country that is not a party to the Apostille Convention); or apostilled (if signed outside the Philippines in a country that is a party to the Apostille Convention);3. If the stockholder is a corporation or a juridical entity, proof of authority of the Stockholder and the stockholder's authorized representative, if any, to sign the indemnity letter. | 0% | Regular rates under the Tax Code |

Upon submission of the documents above, the Claiming Stockholder shall be entitled to avail of the preferential tax rate.

If the Claiming Stockholder is unable to submit the document within the date and time prescribed, SSP will withhold and remit the taxes at the applicable regular withholding tax rates under the NIRC.

Custodians/brokers are advised to inform their clients of the specific requirements stated in these guidelines immediately upon issuance hereof, in order that the required documents may be prepared and/or obtained and submitted to SSP within the deadline indicated herein.

For any questions on the foregoing, you may contact any of the following:

Investor Relations:

Ms. Caroline S. Sicat

Email: ssp.ir@sfasemicon.com

Tel: 045-499-1741 and 045-499-1745

BDO Stock Transfer Agent

Ms. Gigi C. Arcaba

Email: bdo-stock-transfer@bdo.com.ph

Tel: 632-878-4963

Indemnity

[To be **notarized** (if signed **in** the Philippines); to be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]

Date: _____, 2022

SFA Semicon Philippines Corporation

Panday Pira Ave corner Creekside Road

Clark Freeport Zone, Pampanga, Philippines

Attention: Mr. Joon Sang Kang
President & Chief Executive Officer

Re: Tax Treaty Relief for Cash Dividends from
SFA Semicon Philippines Corporation) _____

Dear Sir:

This is in relation to the cash dividends (the “**Dividends**”) which the undersigned _____¹ (the “**Stockholder**”) will be receiving from SFA Semicon Philippines Corporation (“**SSP**”) pursuant to the latter’s dividend declaration in the amount of US\$0.00118 per share, payable on April 8, 2022 to SSP’s stockholders of record as of March 18, 2022.

The Stockholder hereby represents and warrants to SSP as follows: (a) The Stockholder is a [_____ citizen _____ residing _____ in _____^{2/} corporation organized and existing under the laws of _____³ with registered _____ office _____ address/principal _____ place _____ of _____ business _____ at _____⁴]; (b) The Stockholder is a stockholder of SSP on and as of the record date of March 18, 2022 with _____⁶ shares of stock in SSP [which the Stockholder holds through _____⁷]; (c) The Stockholder is entitled to avail himself/herself/itself of the final withholding tax on dividends at the rate of _____ %⁹ under _____ and in accordance with the Philippines - _____¹⁰ Tax Treaty (the “**Tax Treaty Rate**”); and (d) The Stockholder has submitted all the documentary requirements to SSP to avail himself/herself/itself of the said preferential Tax Treaty Rate, and that based on such submitted documents, SSP may withhold taxes on the Stockholder’s Dividends using the Tax Treaty Rate.

¹ Insert name of Stockholder.

² Insert complete residential address.

³ Insert country of incorporation/registration/constitution.

⁴ Insert full address.

⁵ Choose the one which is applicable. If the Stockholder is an individual, he/she should fill-in the fields meant for individuals. If the Stockholder is a corporation or a juridical entity, it should fill-in the fields meant for corporations/juridical entities.

⁶ Insert number of shares.

⁷ Insert Name of Trading Participant/Custodian/Broker, if applicable.

⁸ Include bracketed phrase only if the Stockholder’s shares are lodged with the Philippine Depository and Trust Corporation or PDTC (formerly, PCD).

⁹ Insert lower withholding tax rate under the applicable tax treaty.

¹⁰ Insert name of country treaty partner.

Given the foregoing, the Stockholder hereby requests SSP to withhold tax on the Stockholder's Dividends using the Tax Treaty Rate, and to file a Request for Confirmation ("**RFC**") with the Philippine Bureau of Internal Revenue ("**BIR**") of the applicability of such Tax Treaty Rate on the Stockholder's Dividends.

To induce SSP to withhold and remit the tax on the Stockholder's Dividends using the Tax Treaty Rate, the Stockholder hereby agrees, undertakes, and covenants to SSP as follows:

1. In the event that the RFC is denied by the BIR or otherwise if an assessment is issued by the tax authorities for SSP's failure to pay the correct amount of tax on the Stockholder's Dividends, the Stockholder shall be solely liable for, and must promptly pay, any deficiency taxes, fees, charges, and all other amounts (including, without limitation, surcharges, interests, fines, and penalties) due to the Philippine tax authorities with respect to the Stockholder's Dividends, without recourse to SSP, and shall promptly give the full payment to SSP for timely remittance to the BIR.
2. The Stockholder shall indemnify SSP and its other stockholders, directors, officers, agents, and employees (SSP and these other entities, collectively, are the "**Indemnified Persons**") for, and shall hold the Indemnified Persons free and harmless from and against, any and all losses, claims, demands, damages, and liabilities of any kind (and any and all actions and proceedings in respect thereof), including, without limitation, deficiency taxes, fees, charges, surcharges, fines, penalties, and interests, attorney's fees, and other costs and disbursements, relating to or arising out of the withholding of taxes on the Stockholder's Dividends based on the Tax Treaty Rate or relating to or arising out of any assessment from the BIR on this matter, or otherwise in relation to or arising from SSP's reliance on the Stockholder's representations, warranties, covenants, and agreements herein.

The Stockholder acknowledges that this Indemnity (i) is a fundamental consideration to, and has been relied upon by, SSP in withholding tax on the Stockholder's Dividends at the Tax Treaty Rate, and (ii) has been executed by the Stockholder in favor of SSP and the other Indemnified Persons, and the Stockholder intends to be bound hereby to SSP and the other Indemnified Persons.

The Stockholder hereby additionally represents and warrants to SSP that (a) the Stockholder has full power, authority, and legal right to execute, deliver and perform this Indemnity and has taken all the necessary corporate action to authorize the foregoing; (b) this Indemnity constitutes the Stockholder's legal, valid and binding obligation to SSP and the other Indemnified Persons, enforceable against the Stockholder by SSP and/or the other Indemnified Persons in accordance with the terms of this Indemnity; and (c) the Stockholder's execution, delivery and performance of this Indemnity do not and will not violate any provision of, or result in a breach or constitute a default under any law, regulation or judgment, or violate the Stockholder's constitutional documents (if applicable) and any agreement binding upon the Stockholder or any of the Stockholder's property.

The Stockholder agrees that this Indemnity shall survive any full or partial transfer or disposition of the Stockholder's shares of stock in SSP.

Thank you.

(Name of the Stockholder) [By:

*(Name of the authorized representative)
(Position of the authorized representative)]¹¹*

Agreed and accepted on _____, 2022 by:

SFA Semicon Philippines Corporation

By:

Joon Sang Kang
President and CEO

¹¹ Include bracketed phrase if the stockholder signs through an authorized representative.

ACKNOWLEDGMENT

REPUBLIC OF THE PHILIPPINES)
CITY) S.S.

BEFORE ME, a Notary Public in and for _____, personally appeared the following person who presented to me his Competent Evidence of Identity (CEI) bearing his photograph and signature as follows:

| <u>Name</u> | <u>Details of CEI</u> | <u>Issued At</u> | <u>Issued On</u> |
|--|-----------------------|------------------|------------------|
| (NAME OF STOCKHOLDER) [represented herein by | | | |
| (Name of Authorized Representative), Authorized Representative] ¹² | | | |

known to be the same person who executed the foregoing document and who acknowledged to me that he executed the same as his free and voluntary act and deed and the free and voluntary act and deed of the corporation that he represents.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this ____ day of _____, 2022 at _____.

Doc. No. ____;
Page No. ____;
Book No. ____;
Series of 2022.

*[To be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]*

¹² Include bracketed phrase if the stockholder signs through an authorized representative.

Indemnity

[To be **notarized** (if signed **in** the Philippines); to be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]

Date: _____, 2022

SFA Semicon Philippines Corporation
 Panday Pira Ave corner Creekside Road
 Clark Freeport Zone, Pampanga, Philippines

Attention: Mr. Joon Sang Kang
President & Chief Executive Officer

Re: Tax Sparing Relief for Cash Dividends from SFA Semicon Philippines Corporation

Dear Sir:

This is in relation to the cash dividends (the “**Dividends**”) which the undersigned _____¹³ (the “**Stockholder**”) will be receiving from SFA Semicon Philippines Corporation (“**SSP**”) pursuant to the latter’s dividend declaration in the amount of US\$0.00118 per share, payable on April 8, 2022 to SSP’s stockholders of record as of March 18, 2022.

The Stockholder hereby represents and warrants to SSP as follows: (a) The Stockholder is a [_____ citizen residing in _____^{14/}

corporation organized and existing under the laws of _____¹⁵ with registered office address/principal place of business at _____^{16/17};

(b) The Stockholder is a stockholder of SSP on and as of the record date of March 18, 2022 with _____¹⁸ shares of stock in SSP [which the Stockholder holds through _____^{19/20}; (c) The Stockholder

is entitled to avail himself/herself/itself of the 15% final withholding tax under Section 28(B)(5)(b) of the Philippine Tax Code or the “Tax Sparing Rule” (this 15% final withholding tax rate is also referred to here as the “**Tax Sparing Rate**”); and (d) The Stockholder has submitted all the documentary requirements to SSP to avail himself/herself/itself of the said Tax Sparing Rate, and that based on such submitted documents, SSP may withhold taxes on the Stockholder’s Dividends using the 15% final withholding tax rate.

¹³ Insert name of Stockholder.

¹⁴ Insert complete residential address.

¹⁵ Insert country of incorporation/registration/constitution.

¹⁶ Insert full address.

¹⁷ Choose the one which is applicable. If the Stockholder is an individual, he/she should fill-in the fields meant for individuals. If the Stockholder is a corporation or a juridical entity, it should fill-in the fields meant for corporations/juridical entities.

¹⁸ Insert number of shares.

¹⁹ Insert Name of Trading Participant/Custodian/Broker, if applicable.

²⁰ Include bracketed phrase only if the Stockholder’s shares are lodged with the Philippine Depository and Trust Corporation or PDTC (formerly, PCD).

Given the foregoing, the Stockholder hereby requests SSP to withhold tax on the Stockholder's Dividends using the Tax Sparing Rate. If SSP uses the 15% final withholding tax rate, the Stockholder is obliged to file, and shall file, with the Philippine Bureau of Internal Revenue ("BIR") a Request for Confirmation ("RFC") of the applicability of such lower rate on the Stockholder's Dividends.

In such case, the Stockholder hereby agrees to submit such RFC to the BIR within the prescribed period under relevant rules, and to transmit to SSP a certified true copy of the filed application form and letter-request, with the required attachments, within three (3) working days from submission to the BIR, without need of any notice or demand from SSP. The Stockholder also hereby agrees to give to SSP a copy of the BIR's decision on the RFC within three (3) working days from receipt by the Stockholder of such decision, without need of any notice or demand from SSP.

To induce SSP to withhold and remit the tax on the Stockholder's Dividends using the Tax Sparing Rate, the Stockholder hereby agrees, undertakes, and covenants to SSP as follows:

1. In the event that the Stockholder is unable to file an RFC within the prescribed period, or the RFC is denied by the BIR, or otherwise if an assessment is issued by the tax authorities for SSP's failure to pay the correct amount of tax on the Stockholder's Dividends, the Stockholder shall be solely liable for, and must promptly pay, any deficiency taxes, fees, charges, and all other amounts (including, without limitation, surcharges, interests, fines, and penalties) due to the Philippine tax authorities with respect to the Stockholder's Dividends, without recourse to SSP, and shall promptly give the full payment to SSP for timely remittance to the BIR
2. The Stockholder shall indemnify SSP and its other stockholders, directors, officers, agents, and employees (SSP and these other entities, collectively, are the "**Indemnified Persons**") for, and shall hold the Indemnified Persons free and harmless from and against, any and all losses, claims, demands, damages, and liabilities of any kind (and any and all actions and proceedings in respect thereof), including, without limitation, deficiency taxes, fees, charges, surcharges, fines, penalties, and interests, attorney's fees, and other costs and disbursements, relating to or arising out of the withholding of taxes on the Stockholder's Dividends based on the Tax Sparing Rate or the failure by the Stockholder to file a RFC or any assessment from the BIR on this matter, or otherwise in relation to or arising from SSP's reliance on the Stockholder's representations, warranties, covenants and agreements herein.

The Stockholder acknowledges that this Indemnity (i) is a fundamental consideration to, and has been relied upon by, SSP in withholding tax on the Stockholder's Dividends at the Tax Sparing Rate, and (ii) has been executed by the Stockholder in favor of SSP and the other Indemnified Persons, and the Stockholder intends to be bound hereby to SSP and the other Indemnified Persons.

The Stockholder hereby additionally represents and warrants to SSP that (a) the Stockholder has full power, authority, and legal right to execute, deliver and perform this Indemnity and has taken all the necessary corporate action to authorize the foregoing; (b) this Indemnity constitutes the Stockholder's legal, valid and binding obligation to SSP and the other Indemnified Persons, enforceable against the Stockholder by SSP and/or the other Indemnified Persons in accordance with the terms of this Indemnity; and (c) the Stockholder's execution, delivery and performance of this Indemnity do not and will not violate any provision of, or result in a breach or constitute a default under any law, regulation or judgment, or violate the Stockholder's constitutional documents (if applicable) and any agreement binding upon the

Stockholder or any of the Stockholder's property.

The Stockholder agrees that this Indemnity shall survive any full or partial transfer or disposition of the Stockholder's shares of stock in SSP.

Thank you.

(Name of the Stockholder)

[By:

(Name of the authorized representative)

(Position of the authorized representative)]²¹

Agreed and accepted on _____, 2022 by:

SFA Semicon Philippines Corporation

By:

Joon Sang Kang

President and CEO

²¹ Include bracketed phrase if the stockholder signs through an authorized representative.

ACKNOWLEDGMENT

REPUBLIC OF THE PHILIPPINES)
CITY) S.S.

BEFORE ME, a Notary Public in and for _____, personally appeared the following person who presented to me his Competent Evidence of Identity (CEI) bearing his signature and photograph as follows:

| <u>Name</u> | <u>Details of CEI</u> | <u>Issued At</u> | <u>Issued On</u> |
|-------------|-----------------------|------------------|------------------|
|-------------|-----------------------|------------------|------------------|

**(NAME OF
STOCKHOLDER)
[represented herein by**

**(Name of Authorized
Representative), Authorized
Representative]**²²

known to be the same person who executed the foregoing document and who acknowledged to me that he executed the same as his free and voluntary act and deed and the free and voluntary act and deed of the corporation that he represents.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this ____ day of _____, 2022 at _____.

Doc. No. ____;
Page No. ____;
Book No. ____;
Series of 2022.

*[To be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]*

²² Include bracketed phrase if the stockholder signs through an authorized representative.

Indemnity

[To be **notarized** (if signed **in** the Philippines); to be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]

Date: _____, 2022

SFA Semicon Philippines Corporation
 Panday Pira Ave corner Creekside Road
 Clark Freeport Zone, Pampanga, Philippines

Attention: Mr. Joon Sang Kang
President & Chief Executive Officer

Re: Tax Exemption for Cash Dividends from SFA Semicon Philippines Corporation

Dear Sir:

This is in relation to the cash dividends (the “**Dividends**”) which the undersigned _____²³ (the “**Stockholder**”) will be receiving from SFA Semicon Philippines Corporation (“**SSP**”) pursuant to the latter’s dividend declaration in the amount of US\$0.00118 per share, payable on April 8, 2022 to SSP’s stockholders of record as of March 18, 2022.

The Stockholder hereby represents and warrants to SSP as follows: (a) The Stockholder is a [_____ citizen _____ residing _____ in _____²⁴/ _____²⁵ corporation organized and existing under the laws of _____ with _____ registered office address/principal place of business _____ at _____²⁶]; (b) The Stockholder is a stockholder of SSP on and as of the record date of March 18, 2022 with _____²⁸ shares of stock in SSP [which the Stockholder holds through _____²⁹]; (c) The Stockholder is entitled to avail himself/herself/itself of exemption from final withholding tax on dividends; and (d) The Stockholder has submitted all the documentary requirements to SSP to avail himself/herself/itself of the said of exemption from final withholding tax and, based on such submitted documents, SSP may not withhold taxes on the Stockholder’s Dividends.

Given the foregoing, the Stockholder hereby requests SSP not to withhold tax on the Stockholder’s Dividends.

²³ Insert name of Stockholder.

²⁴ Insert complete residential address.

²⁵ Insert country of incorporation/registration/constitution.

²⁶ Insert full address.

²⁷ Choose the one which is applicable. If the Stockholder is an individual, he/she should fill-in the fields meant for individuals. If the Stockholder is a corporation or a juridical entity, it should fill-in the fields meant for corporations/juridical entities.

²⁸ Insert number of shares.

²⁹ Insert Name of Trading Participant/Custodian/Broker, if applicable.

³⁰ Include bracketed phrase only if the Stockholder’s shares are lodged with the Philippine Depository and Trust Corporation or PDTC (formerly, PCD).

To induce SSP not to any withhold tax on the Stockholder's Dividends, the Stockholder hereby agrees, undertakes, and covenants to SSP as follows:

1. In the event that the Stockholder is assessed by the Bureau of Internal Revenue ("**BIR**") for deficiency taxes, fees, charges, surcharges, interests, or penalties or any other amounts arising from such non-withholding of tax on the Stockholder's Dividends, the Stockholder shall be solely liable for, and must promptly pay, any such deficiency taxes, fees, charges, and all other amounts (including, without limitation, surcharges, interests, fines, and penalties) due to the Philippine tax authorities with respect to the Stockholder's Dividends, without recourse to SSP, and shall promptly give the full payment to SSP for timely remittance to the BIR
2. The Stockholder shall indemnify SSP and its other stockholders, directors, officers, agents, and employees (SSP and these other entities, collectively, are the "**Indemnified Persons**") for, and shall hold the Indemnified Persons free and harmless from and against, any and all losses, claims, demands, damages, and liabilities of any kind (and any and all actions and proceedings in respect thereof), including, without limitation, deficiency taxes, fees, charges, surcharges, fines, penalties, and interests, attorney's fees, and other costs and disbursements, relating to or arising out of the non-withholding of taxes on the Stockholder's Dividends or relating to or arising out of any assessment from the BIR on this matter, or otherwise in relation to or arising from SSP's reliance on the Stockholder's representations, warranties, covenants and agreements herein.

The Stockholder acknowledges that this Indemnity (i) is a fundamental consideration to, and has been relied upon by, SSP in not withholding tax on the Stockholder's Dividends, and (ii) has been executed by the Stockholder in favor of SSP and the other Indemnified Persons, and the Stockholder intends to be bound hereby to SSP and the other Indemnified Persons.

The Stockholder hereby additionally represents and warrants to SSP that (a) the Stockholder has full power, authority, and legal right to execute, deliver and perform this Indemnity and has taken all the necessary corporate action to authorize the foregoing; (b) this Indemnity constitutes the Stockholder's legal, valid and binding obligation to SSP and the other Indemnified Persons, enforceable against the Stockholder by SSP and/or the other Indemnified Persons in accordance with the terms of this Indemnity; and (c) the Stockholder's execution, delivery and performance of this Indemnity do not and will not violate any provision of, or result in a breach or constitute a default under any law, regulation or judgment, or violate the Stockholder's constitutional documents (if applicable) and any agreement binding upon the Stockholder or any of the Stockholder's property.

The Stockholder agrees that this Indemnity shall survive any full or partial transfer or disposition of the Stockholder's shares of stock in SSP.

Thank you.

(Name of the Stockholder)

[By:

(Name of the authorized representative)

*(Position of the authorized representative)]*³¹

³¹ Include bracketed phrase if the stockholder signs through an authorized representative.

Agreed and accepted on _____, 2022 by:

SFA Semicon Philippines Corporation

By:

Joon Sang Kang
President and CEO

ACKNOWLEDGMENT

REPUBLIC OF THE PHILIPPINES)
CITY) S.S.

BEFORE ME, a Notary Public in and for _____, personally appeared the following person who presented to me his Competent Evidence of Identity (CEI) showing his signature and photograph as follows:

| <u>Name</u> | <u>Details of CEI</u> | <u>Issued At</u> | <u>Issued On</u> |
|--|-----------------------|------------------|------------------|
| (NAME OF STOCKHOLDER) [represented herein by | | | |
| (Name of Authorized Representative), Authorized Representative] ³² | | | |

known to be the same person who executed the foregoing document and who acknowledged to me that he executed the same as his free and voluntary act and deed and the free and voluntary act and deed of the corporation that he represents.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this ____ day of _____, 2022 at _____.

Doc. No. ____;
Page No. ____;
Book No. ____;
Series of 2022.

*[To be **consularized** (if signed **outside the Philippines** in a country that is **not** a party to the Apostille Convention) or **apostilled** (if signed **outside the Philippines** in a country that is a party to the Apostille Convention)]*

³² Include bracketed phrase if the stockholder signs through an authorized representative.

CERTIFICATION

I, _____, of legal age, Filipino with office address _____, being the [position] of [NAME OF BROKER/CUSTODIAN/PDTC PARTICIPANT] _____ a corporation duly organized and existing under Philippine law and duly licensed to engage in business as a stockbroker/dealer/trustee, with office address at _____, under oath, do hereby certify that:

The following is the list of the beneficial owners of the [**no. of shares in words**] [**(no. of shares in figures)**] shares of SFA Semicon Philippines Corporation (“SSP”) held by [NAME OF BROKER/CUSTODIAN/PDTC PARTICIPANT], in its capacity as agent/broker/trustee, as of March 18, 2022, the record date for the dividends declared by SSP’s Board of Directors on February 18, 2022:

| Seq. No. | Names of Client Beneficial Owners (Last Name, First Name, Middle Name for individuals; Complete Name for non-individuals) | Addresses of Beneficial Owners | TIN | Nationality / Residence/Place of Incorporation | Total Shareholding | Birth date/Registration number and date of registration | Client account code | Broker code |
|----------|---|--------------------------------|-----|--|--------------------|---|---------------------|-------------|
| | | | | | | | | |
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| | | | | | | | | |

IN WITNESS WHEREOF, this Certification has been signed this ____ day of ____ 2022 in _____, Philippines.

[Name]
[President/Equivalent Position]

[Name]
[Head of Settlement/Equivalent Position]

SUBSCRIBED AND SWORN to before me, a Notary Public for and in the City of _____, Philippines, this _____,
by affiants who are personally known to me and whose identities I have confirmed through their respective competent proofs of identity bearing their photograph
and signature:

Name of Affiant

Passport/Driver's License No.

Date and Place of Issue

.
Doc. No. ____;
Page No. ____;
Book No. ____;
Series of 2022