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21 February 2024

ALLIED CARE EXPERTS (ACE) MEDICAL CENTER
ZAMBOANGA CITY, INC.
Don Alfaro St., Tetuan, Zamboanga City

Attention : DR. JAMES ROBERTSON C. PICHEL
Subject : Opinion on Tax Matters

Dear Sir:

I have reviewed the tax information included in this Prospectus relating to the registration of 54,000 common shares of ₱1,000,000,000.00 worth of Allied Care Experts (ACE) Medical Center Zamboanga City, Inc. (the "Company", "Client"). Based on my review, I found the tax information contained in the Prospectus consistent with the provisions of Philippine Tax Laws.

The following are the related taxes regarding the registered shares of stocks of a Corporation:

a) Documentary stamp tax

In accordance with the National Internal Revenue Code of 1997, Section 179, Stamp Tax on All Debt Instrument - "On every original issue of debt instruments, there shall be collected a documentary stamp tax of One peso and fifty centavos (₱1.50)¹ on each Two hundred pesos (₱200), or fractional part thereof, of the issue price of any such debt instruments: Provided, That such debt instruments with terms of less than one (1) year, the documentary stamp tax to be collected shall be of a proportional amount in accordance with the ratio of its term in number of days to three hundred sixty-five (365) days"

b) Final withholding tax


A final tax rate of twenty percent (20%) is imposed on the amount of interest distributed to the investors. As per National Internal Revenue Code of 1997, "A final tax at the rate of twenty percent (20%) is hereby imposed upon the amount of interest from any currency bank deposit and yield or any other monetary benefit from deposit substitutes and from trust funds and similar arrangements"

¹ As amended by Section 55 of the TRAIN Law. Previous rate was ₱1.00.

In case a holder of shares is exempt from tax, a BIR Certificate of Exemption is requested together with other relevant documents such as Articles of Incorporation, General Information Sheet, etc.

Other than the taxes mentioned, I believe that there are no other taxes applicable relating to the registration and issuance of shares of stocks of a corporation. This Opinion is issued for the information of and assistance to the Company in connection with its registration of 54,000 common shares of the Corporation.

I also consent to being named as Tax Counsel of the Company and I further consent to the filing of a copy of this Opinion letter as an Exhibit to the Registration Statement.



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January 22, 2024
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