

TRANSLATION

OPINION FECI COMMISSION

ACQUISITION OF HOUSING THROUGH LOANS FOR PURCHASING SHARES OF A CORPORATION

Domestic personal or commercial loans greater than B/.5,000.00 granted for the purchase of shares of a Corporation are subject to the 1% FECI withholding regardless of the property owned by the corporation, as no provision of Law 4 of 1994 exempts these loans; i.e., this activity is not exempt from the FECI regime.