

[Date]

[Recipient Name/Tax Authority Department]

[Address Line 1]

[Address Line 2]

RE: Notice of Election - Intercompany Financing Safe Harbor

To Whom It May Concern,

This letter serves as formal notification that [Company Name] (the "Company") elects to apply the safe harbor provisions for intercompany financing transactions as provided under [Reference Specific Tax Regulation/Law, e.g., Section 1.482 of the IRS Code or local Transfer Pricing Guidelines] for the fiscal year ending [Year End Date].

In accordance with the requirements for this election, the Company confirms the following:

- **Eligibility:** The Company and its affiliates qualify as "eligible entities" under the stated regulations.
- **Transaction Details:** The intercompany loan/financing arrangement between [Lender Entity Name] and [Borrower Entity Name] is subject to an interest rate of [Interest Rate]%.
- **Benchmark Compliance:** This rate falls within the "Safe Harbor" range as defined by [Relevant Authority] for the applicable period.
- **Consistency:** The Company will apply this safe harbor method consistently to all similar financing transactions within this tax jurisdiction.

Supporting documentation, including the intercompany loan agreement and relevant financial statements, is maintained at the Company's registered office and is available for inspection upon request.

Please acknowledge receipt of this election by stamping the enclosed copy of this letter.

Sincerely,

[Signature]

[Name of Authorized Signatory]

[Title/Position]

[Company Name]