REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE
Quezon City

Certificate of Tax Exemption No:
NSH - 087 - 2021

CERTIFICATE OF TAX EXEMPTION

This certifies that the Contract Agreement executed by and among the **National Housing Authority (NHA), Lubao Resettlement Homeowners Association, Inc.** and **Eddmari Construction & Trading** for the sale of developed lots and completed housing units located at Brgy. San Pablo 2nd, Lubao, Pampanga, to wit:

Name of Housing Project	Date of Contract Agreement	Number of Socialized Housing Units Covered by Tax Exemption	Location of the Project
Lubao Resettlement	December 7, 2020	1,000[1]	Brgy. San Pablo 2nd, Lubao, Pampanga

which project has been classified as socialized housing under the NHA's National Housing Program through the Community Based Initiative Approach (CBIA), is **not subject** to income tax/creditable withholding tax and value-added tax pursuant to Section 20 of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the Tax Code of 1997, as amended.

However, the purchases of goods/articles by **Eddmari Construction & Trading** shall be subject to VAT, even if the said purchases are to be used for the socialized housing projects, since VAT is an indirect tax which can be passed on by the seller of the goods/services. It shall be understood that **Eddmari Construction & Trading** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deeds of Unilateral Sale executed by the Landowners in favor of the NHA over the parcels of land described below, to wit;

Date of Deed of Unilateral Sale	Name of Landowners	Transfer Certificate of Title No.	Aggregate Area (sq. m.)	Area Transferred for NHA Utilization (sq.m.)	Location of Property/ies
December 7, 2020	Ian D. Diwa		13,186	13,186	Brgy. San Pablo 2nd, Lubao, Pampanga
	Niah Diwa-Nery		13,186	13,186	
	Faith D. Diwa		13,186	13,186	
	Adelma Diwa-Lacap		13,186	13,186	
	Hermes D. Diwa		13,186	13,186	
	Ulysses D. Diwa		13,186	13,186	

which shall be used for the above socialized housing project, is not subject to **capital gains tax/creditable withholding tax, documentary stamp tax** and **value-added tax** pursuant to Sections 19 and 20 of RA No. 7279 and Section 109(1)(P) of the 1997 Tax Code, as amended.

[1] Per NHA letter dated December 15, 2020

CTE No. NSR-087-2021
Date issued _____

It is, however, understood that this Certificate of Tax Exemption (CTE) is never intended and shall not be construed as giving authority to the concerned Register of Deeds to effect transfer of the land title in the name of the NHA without the Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under RMO No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

This Certificate of Tax Exemption is being issued on the basis of the facts and documents as represented and submitted. However, if upon investigation, the BIR ascertains that the facts are different, then this Certificate shall be considered null and void.

Issued this _____ day of APR 08 2021, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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