REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
CP4-093-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that the Deeds of Absolute Sale executed by the Landowner/s in favor of **DMC URBAN PROPERTY DEVELOPERS INC.** over the parcels of land described below, to wit:

Date	Name of Landowner	Transfer Certificate of Title (TCT) No.	Area (sq.m.)	Transferred (sq.m.)	Location
July 20, 2020	Exemplary Development Corporation		23,053	23,053	Bo. Mulawin, Orani, Bataan
July 20, 2020	FN Realty Corporation		5,763	5,763	Bo. Mulawin, Orani, Bataan
July 20, 2020	Baseline Management Corporation		5,763	5,763	Bo. Mulawin, Orani, Bataan
July 20, 2020	Baseline Management Corporation		5,763	5,763	Bo. Mulawin, Orani, Bataan
September 11, 2020	Centerlane Properties, Inc.		16,992	16,992	Bo. Mulawin, Orani, Bataan
September 11, 2020	Centerlane Properties, Inc.		992	992	Bo. Mulawin, Orani, Bataan
Total			58,326		

in so far as the 50,377[1] sq.m. is concerned, which shall be used in a socialized housing project known as "Dwellings", a project duly registered with the Department of Human Settlement and Urban Development under Provisional Certificate of Registration No. 2020-09-069 and Provisional License to Sell No. 2020-09-090, both dated September 21, 2020, consisting of 791 socialized house and lot units, are not subject to income tax, capital gains tax, expanded withholding tax pursuant to Section 20 (d) (2) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016 and to value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code

[1] *Per Provisional Certificate of Registration No. 2020-09-069 dated September 21, 2020 issued by the Department of Human Settlement and Urban Development*

RR - 033 - 2021
APR 12 2021

(Tax Code) of 1997, as amended. However, the sale is subject to documentary stamp tax (DST) imposed under Section 196 of the Tax Code of 1997, as amended, based on the consideration contracted to be paid for such realties or on their fair market value determined in accordance with Section 6 (e) of the same Code, whichever is higher.

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 Registry of Deeds (RD) to effect transfer of the land titles in the name of the buyer without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR after submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-203, as amended, including proof of payment of DST.

Upon application for exemption, a lien on the titles of the land shall be annotated by the RD having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to socialized housing project pursuant to RA No. 7279.

This CTE 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 12 2021, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

K-1

042239