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

Certificate of Tax Exemption No:
NSH- 035 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **AINA CONSTRUCTION,** an entity engaged by the **National Housing Authority (NHA),** is exempt from project-related income taxes/creditable withholding tax (CWT) pursuant to Section 20 (d) (1) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, on its income received directly in connection with the land development, building construction, and acquisition of 120-Low Rise Building units and 14-Townhouse units, a socialized housing project of the NHA under the Government Employees Housing Program including AFP/PNP Personnel, intended for Presidential Security Group (PSG) Officers and Enlisted Personnel (EP) Quarters, located within PSG Compound, Malacanang Park, Manila.

Moreover, the acquisition of the said 120-Low Rise Building units and 14-Townhouse units shall be exempt from value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code (Tax Code) of 1997, as amended, provided that the exemption from VAT shall only apply to sale of house and lot and other residential dwellings[1] with selling price of not more than P2,000,000.00, as adjusted in 2011 using the 2010 Consumer Price Index values.[2]

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

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 27 2021, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
[2] Per Revenue Regulations No. 4-2021 dated April 8, 2021.