May 17, 2021

CERTIFICATE OF TAX EXEMPTION NO. DT-163-21

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that the Deed of Donation, dated December 01, 2016, executed by:

Name of Donor	TIN	Address
3M PHILS. HOLDING AND DEVELOPMENT CORP.		3M Compound, Santa Rosa II, Marilao, Bulacan 3019

in favor of:

Name of Donee	TIN	Address
MUNICIPAL GOVERNMENT OF MARILAO, BULACAN		Marilao, Bulacan

covering the following property described below, to wit:

Transfer Certificate of Title	Area (sq.m.)	Area Donated (sq.m)	Location
	1,000 [1]	1,000	Sta. Rosa II, Marilao, Bulacan

being a gift in favor of a **political subdivision of the Government**, is exempt from the payment of the donor's tax pursuant to Section 101 (A) (1) [2] of the National Internal Revenue Code of 1997 (Tax Code), as amended.

Accordingly, the Deed of Donation is likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code, as amended. However, the acknowledgement of the Deed of Donation before a notary public is subject to the

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documentary stamp tax of P15.00 [3] imposed under Section 188 of the same Code.

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 17th day of May, 2021.

(SGD.) CAESAR R. DULAY
Commissioner of Internal Revenue

Footnotes

1. Area owned by 3M Phils. Holding and Development Corporation.
2. Renumbered by Republic Act No. 10963.
3. The old DST rate of P15.00 is used since the donation took place prior to the effectivity of R.A. No. 10963.

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