REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
NSH - 220 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **J.C. Uyecio Construction and Development Company/C.S. Garcia Construction Corporation (Joint Venture),** 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 and housing construction consisting of 938 socialized housing units in **Our Lady's Village Resettlement Project,** a socialized housing project of the NHA located at Brgy. San Isidro Village and Cavinitan, Virac, Catanduanes, and is intended to benefit families affected by Typhoon "Nina" and other families living in danger areas willing to be relocated permanently.

Likewise, the acquisition of the said 938 socialized housing units shall be exempt from value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended, provided that the selling price thereof does not exceed P3,199,200.00 per house and lot package; provided further, that beginning January 01, 2021, 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 to P3,199,200.00 in 2011 using the 2010 Consumer Price Index values.[2]

However, the purchases of goods/articles by **J.C. Uyecio Construction and Development Company/C.S. Garcia Construction Corporation (Joint Venture)** 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 **J.C. Uyecio Construction and Development Company/C.S. Garcia Construction Corporation (Joint Venture)** 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 JUL 0 2 2021, ____.

CAESAR R. DULAY
Commissioner of Internal Revenue

KI-MDT

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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 (RR) No. 4-2021 dated April 8, 2021, as amended by RR No. 8-2021 dated June 11, 2021.