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

Certificate of Tax Exemption No:
NSH - 0331 - 2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **Brostan Construction and Development / R.R. Encabo Constructors, Incorporated – Joint Venture**, an entity engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax (CWT), and value added tax (VAT)[1], pursuant to Section 20 (d)(1) and (3) 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 socialized housing project of the NHA intended for the occupant families of the Diosdado Macapagal Tenement (Vitas Tenement) which was damaged by the July 16, 1990 earthquake and declared "condemned" based on the findings and recommendation of the Department of Public Works and Highways (DPWH), and was demolished in October 2011, to wit:

Date of Notice of Award	Date of Contract	Contract Price	Project Name	Location	No. of Socialized Residential Units subject of tax exemption
Mar. 18, 2013	Oct. 30, 2013		Construction of Four (4) Five-Storey Residential Medium Rise Buildings and Land Development	Vitas, Tondo, Manila	240[2] residential units

However, the purchases of goods/articles by **Brostan Construction and Development / R.R. Encabo Constructors, Incorporated – Joint Venture** shall be subject to VAT, even if the said purchases are to be used for the 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 **Brostan Construction and Development / R.R. Encabo Constructors, Incorporated – 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 JUN 29 2022, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] Brostan Construction and Development / R.R. Encabo Constructors, Incorporated – Joint Venture is exempt from VAT pursuant to Section 20 (d) (3) of RA No. 7279, as amended, since the project was awarded prior to the effectivity of RA No. 10963 (TRAIN Law).

[2] Per approved Master Site Development Plan