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

Certificate of Tax Exemption No:
NCH - 452-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **E.M. CUERPO, INC.** (TIN:), an entity engaged by the **National Housing Authority (NHA)**, is exempt from project-related income tax, creditable withholding tax and value-added tax pursuant to Section 20 (d)(1) and (d)(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 construction/development of Ten (10) Five-Storey Medium Rise Buildings consisting of 544 socialized housing units under the NHA's Socialized Housing Program, intended for the underprivileged and homeless families as well as those living in danger areas, to wit:

Date of Notice of Award	Date of Contract Agreement	Contract Price (Php)	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
March 1, 2013	October 24, 2013[1] November 5, 2013[2]	[3]	Ten (10) Five-Storey Medium Rise Buildings with Land Development and Survey Works (Package 2)	Pleasant Hills Subdivision, City of San Jose Del Monte, Bulacan	544

However, the purchases of goods/articles by **E.M. CUERPO, INC.**, 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 **E.M. CUERPO INC.**, must issue VAT Exempt official receipts on its gross receipts from the said socialized housing project.

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 _____ day of DEC 0 9 2021.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] Date acknowledged by NHA.
[2] Date acknowledged by E.M. Cuerpo, Inc.
[3] The Original Project Cost of Php296,888.333.88 was revised to Php318,092,238.80 for quantities overruns/underruns and extra works covered by Variation Order No. 1 issued by the NHA dated February 15, 2016, which contract price was again adjusted to Php326,281,921.17 per Variation Order No. 2 dated August 15, 2016, and was revised to final Contract Cost amounting to Php334,109,607.48 per Variation Order No. 3 dated December 6, 2019.