September 7, 2018

CERTIFICATE OF TAX EXEMPTION NO. 1170-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **ARR CONSTRUCTION**, a sole proprietorship registered under the name of AAA (TIN: 000-000-000-000), and engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax and value-added tax (VAT), pursuant to Section 20 (d) (1) and (3) of Republic Act No. 7279, on its income received directly in connection with the construction/development of socialized housing units under the National Housing Authority (NHA)'s Yolanda Permanent Housing Program, to wit:

Project Name	**Location**	**No. of Socialized Housing Units Subject of Tax Exemption**	**Date of Notice of Award**	**Date of Contract**	**Contract Price**
Nalook Ville	Brgy. Nalook, Kalibo, Aklan	738 (house and lot packages)	September 19, 2017	November 29, 2017	P_____
Makato Homes	Brgy. Tibiawan-Libang, Makato, Aklan	802 (house and lot packages)	September 19, 2017	November 29, 2017	P_____

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

Moreover, the Deeds of Absolute Sale executed by the Landowners in favor of the NHA over the parcels of land described below, to wit:

Date of Deeds of	**Name of Landowner/Seller**	**Transfer Certificate of**	**Area (Sq. m.)**	**Area Transferred**	**Location**

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Sale		Title (TCT)			
April 30, 2018	BBB	087-2018000114	37,823	21,934	Brgy. Nalook, Kalibo Aklan
April 30, 2018	CCC	087-2018000107	37,823	28,887	Brgy. Nalook, Kalibo Aklan
April 30, 2018	DDD	087-2018000113	37,823	4,062	Brgy. Nalook, Kalibo Aklan
May 7, 2018	EEE, FFF, GGG	CLOA-13570	27,317	27,317	Brgy. Tibiawan, Makato, Aklan
May 7, 2018	FFF, GGG & EEE	CLOA-13124	32,751	32,751	Brgy. Libang, Makato, Aklan

which shall be used for the above-mentioned socialized housing projects, are not subject to capital gains tax and documentary stamp tax pursuant to Section 19 of Republic Act (RA) No. 7279.

It is, however, understood that this CTE is never intended, and shall not be construed, as giving authority to the concerned Register of Deeds to effect transfer of the land titles in the name of the buyer without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

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 7th day of September, 2018.

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

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