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

Certificate of Tax Exemption No:
120-2018

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **R.D. POLICARPIO & COMPANY, INC./KIT PROPERTIES, INC. – CONSORTIUM** (TIN:), an entity 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 (RA) 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:

Date of Notice of Award	Date of Contract Agreement	Contract Price	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
March 04, 2015	August 04, 2015		Banate People's Village, Phase II	Brgy. Magdalo, Banate, Iloilo	1,000 units

However, the purchases of goods/articles by **R.D. POLICARPIO & COMPANY, INC./KIT PROPERTIES, INC. - CONSORTIUM** 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 **R.D. POLICARPIO & COMPANY, INC./KIT PROPERTIES, INC. - CONSORTIUM** must issue non-VAT official receipts on its gross receipts from the said socialized housing projects.

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

Date of Deed of Absolute Sale	Name of Landowners	Original Certificate of Title (OCT)	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
May 18, 2015	Heirs of Eda Juanico, namely: Leonardo Cabangal, Leonardo Cabangal, Jr., Milvien Cabangal m/t Alex Balladares, Philly Cabangal, Arden Luz Cabangal, Alvin Cabangal, Brenda Cabangal, Felomino Juanico, Rosie Juanico m/t Ismael Solinap, Angeles Juanico m/t Nery Bebing, Elsie Juanico m/t Rustom Borja, and Consolacion Juanico				Municipality of Banate, Iloilo

[1] Partially cancelled by TCT No.) under the name of NHA

which shall be used for the above-mentioned socialized housing project, is not subject to income tax/capital gains tax/expanded withholding tax, documentary stamp tax and value-added tax (VAT) pursuant to Sections 19 and 20 of RA No. 7279 and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended.

It is, however, understood that this Certificate of Tax Exemption (CTE) is never intended, and shall not be construed, as giving authority to the concerned Register of Deeds (RD) 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 ____ day of FEB 02 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue

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