REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
125-2018

CERTIFICATE OF TAX EXEMPTION

issued to

Name of Donor	TIN	Address
Universal Investors Realty Management and Development Corporation Inc.		Don Mariano Building, General Solano St., San Miguel, Metro Manila

-and-

Name of Donee	TIN	Address
Mission Ministries Philippines Inc.		167-G Kamias Extension, Sikatuna Village, Quezon City

This certifies that the Deed of Donation dated May 21, 2007, entered by the Donor and the Donee over the parcels of land described below, to wit;

Transfer Certificate of Title	Area (sq.m.)	Location
		Brgy. North Fairview, Quezon City
		Brgy. North Fairview, Quezon City
		Brgy. North Fairview, Quezon City

being gifts in favor of a **social welfare and charitable corporation,** is exempt from the payment of the donor's tax pursuant to Section 101 (A) (3) of the Tax Code of 1997, as amended, subject to the condition that not more than thirty percent (30%) of said gifts shall be used by the donee for administration purposes.

Moreover, Section 185 of Regulations No. 26, otherwise known as the Revised Documentary Stamp Tax Regulations, implementing Title VII of the Tax Code, provides that conveyances of realties not in connection with a sale, to trustees or other persons without consideration are not taxable. Accordingly, the Deed of Donation is likewise not subject to the documentary stamp tax prescribed under Section 196 of the Tax Code, as amended, but only to the documentary stamp tax of P15.00 imposed under Section 188 of the same Code.

Lastly, the donation is, however, subject to value-added tax (VAT) since the donor is a VAT-registered real estate developer and the donated properties are deemed ordinary assets.

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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