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

**Certificate of Tax Exemption No:**
PSH- 0151-2020

# CERTIFICATE OF TAX EXEMPTION

**TO ALL WHOM IT MAY CONCERN:**

This certifies that **ROCKWELL LAND CORPORATION Doing business under the name and style of POWERPLANT MALL; POWERPLANT CINEMAS; And EDADES SERVICED APARTMENTS,** with Taxpayer's Identification Number [redacted], is exempt from income tax, creditable withholding tax (CWT) and value-added tax (VAT) pursuant to Section 20 of Republic Act (RA) No. 7279 and Section 109(1)(P) of 1997 Tax Code, as amended, on its income received directly in connection with its sale of socialized housing units to qualified beneficiaries in **Stonewell Acacia Homes**, consisting of **152**[1] socialized house and lot units, located at Brgy. San Pedro, Sto. Tomas, Batangas, a project duly registered with the Housing and Land Use Regulatory Board (HLURB) under Certificate of Registration No. [redacted] and License to Sell No. [redacted] provided that the selling price per house and lot package does not exceed ₱450,000.00[2] per house and lot.

Nonetheless, it is observed that documentary stamp tax (DST) is not one of the taxes covered by the tax exemption clause in Section 20 of RA No. 7279. Such being the case, the owner/project developer/seller shall be liable to pay the documentary stamp tax on the documents conveying the properties imposed under Section 196 of the Tax Code of 1997, as amended, based on the consideration contracted to be paid for such realties or on their fair market value determined in accordance with Section 6 (E) of the same Code, whichever is higher. Likewise, lots/units classified as Economic Housing, not being covered by R.A. No. 7279, shall be subject to the payment of appropriate taxes.

The grant of tax exemption herein is subject to the compliance with the provisions of applicable BIR rules and regulations and the Terms and Conditions stated at the back hereof. The Company is liable, however, for all other applicable taxes not discussed above.

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 06 2020, _____.

**CAESAR R. DULAY**
Commissioner of Internal Revenue

032545

K-1-JAC

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[1] Only 152 units are not credited to other projects per HLURB License to Sell No. 031343.
[2] The maximum selling price is pegged at ₱450,000.00 based on HLURB License to Sell No. 031343.

CTE No. PSI-_ 0151-2020
Date issued FEB 06 2020

## TERMS AND CONDITIONS OF THE CERTIFICATE OF TAX EXEMPTION

1. The exemption from income, creditable withholding taxes and VAT covers only income directly attributable to the revenues generated from the **152** socialized housing units in **Stonewell Acacia Homes**, located at **Brgy. San Pedro, Sto. Tomas, Batangas**.

2. The developer shall submit the sworn statement of the buyer that he is eligible as a socialized housing beneficiary under Section 5 (A) of Revenue Regulations (RR) No. 11-97 to the BIR during the processing of the Certificate Authorizing Registration (CAR) for the transfer of the title of the socialized housing unit.

3. It is understood that the Certificate Authorizing Registration (CAR) shall only be issued after it is established upon proper verification by the Revenue District Officer (RDO) concerned that, considering the rules on valuation of real property, the actual selling price per sale transaction of the socialized house and lot packages in this case does not really exceed ₱450,000.00 per house and lot unit.

4. List of Non-saleable lots per HLURB License to Sell No. , granted by the HLURB, Region STR, Dencris Business Center, Brgy. Halang, Calamba City, Laguna to wit:

| Non-Saleable | Block No. | Lot No. |
|---|---|---|
| Parks/Playground | 17 | 2 |
| Community Facilities | 17 | 1 |
| Community Facilities | 2 | 23 & 1 |
| Community Facilities | 1 | 1 |
| Excluded Portion | | 21 |
| Excluded Portion | Encroachment 1,2 & 3 | |

5. No. of Units in compliance to Section 18 of RA 7279 per HLURB License to Sell No. , granted by the HLURB, Region STR, Dencris Business Center, Brgy. Halang, Calamba City, Laguna to wit:

| Credited to: | Address | No. of Lots & Units |
|---|---|---|
| Economic Housing Project | | 55 |
| Stonewell – Royal Palm Homes | Brgy. San Pedro, Sto. Tomas, Batangas | 128 |
| The Arton by Rockwell | Aurora Blvd., Loyola Heights, Quezon City | 69 |
| Aruga by Rockwell Resort and Residences Mactan-Cebu | Punta Engaño Rd., Brgy. Punta Engaño, Lapu-Lapu City, Mactan, Cebu | 160 |
| **TOTAL** | | **412** |

**Remaining Balance = 152 Units**