REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No.
163-2018

CERTIFICATE OF TAX EXEMPTION

issued to

SAN RAMON HOLDINGS, INC.
7th Floor Rufino Plaza, 6784 Ayala Ave., Makati City
TIN:

This certifies that the donation under the Deed of Donation dated March 22, 2012 executed by **San Ramon Holdings, Inc.** in favor of:

Name of Donee	TIN	Address
Superior De La Corporacion Filipina De Padres Agustinos Recoletos, Inc.		Magallanes St., Brgy. Kalubihan, Cebu City

covering the following property:

Transfer Certificate of Title	Area (sq.m.)	Location
		Brgy. Canlubang, Calamba City, Laguna

being a donation in favor of a religious 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 the said gift 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.

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 14 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue

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