February 22, 2019

CERTIFICATE OF TAX EXEMPTION NO. 187-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **AINA CONSTRUCTION** (TIN: 000-000-000), 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 No. 7279, as amended by Republic Act No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, on its income received directly in connection with the construction/development of socialized housing units/lots under the National Housing Authority (NHA)'s Typhoon Permanent Housing Program, to wit:

Project Name	**Location**	**No. of Socialized Housing Units/ Lots Subject of Tax Exemption**	**Date of Notice of Award**	**Date of Contract Agreement**	**Contract Price**
Green Park Ville	Brgy. Takas, Valderrama-Site 1, Antique	**510**	May 19, 2017	July 25, 2017	P_____

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

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

		Original			

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Date of Deeds of Absolute Sale	Name of Landowner/ Seller	Certificate of Title (OCT)/ Transfer Certificate of Title (TCT) No.	Area (sq. m.)	Area Transferred (sq. m.)	Location
July 25, 2017	AAA	OCT No. P-47629	15,000	15,000	Brgy. Takas, Valderrama, Antique
July 25, 2017	BBB & CCC	OCT No. P-47270	18,558	18,558	Brgy. Takas, Valderrama, Antique

which shall be used for the above-mentioned socialized housing project, are not subject to income tax/capital gains tax/expanded withholding tax, documentary stamp tax and value-added tax (VAT) [1] pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279.

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 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. The Register of Deeds shall annotate on the titles of the lots that the same are to be applied or are being applied to socialized housing projects pursuant to RA 7279.

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 22nd day of February, 2019.

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

Footnotes

1. The Deeds of Absolute Sale were executed prior to effectivity of Republic Act No. 10963 or TRAIN Law.

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