February 26, 2019

CERTIFICATE OF TAX EXEMPTION NO. 195-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **PACIFIC CONCRETE PRODUCTS, INC.** (TIN: 000-000-000-000), 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 RA 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 under the National Housing Authority (NHA)'s Yolanda Permanent Housing Program, to wit:

Date of Notice of Award	**Date of Contract Agreement**	**Contract Price (Php)**	**Project Name**	**Location**	**No. of Socialized Housing Units subject of tax exemption**
June 20, 2016	August 11, 2017	P_____	Briones Village	Brgy. Briones, Kalibo, Aklan	851

However, the purchases of goods/articles by **PACIFIC CONCRETE PRODUCTS, INC.** 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 **PACIFIC CONCRETE PRODUCTS, INC.** 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:

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Date of Deeds of Sale/ Unilateral Sale	Name of Landowner/Seller	Transfer Certificate of Title (TCT) No.	Area (Sq. m.)	Area Transferred	Location
July 17, 2017	Heirs of AAA	P-36597	6,942	6,942	Brgy. Briones, Kalibo, Aklan
July 17, 2017	BBB	P-33953	6,941	6,941	Brgy. Briones, Kalibo, Aklan
July 17, 2017	CCC	T-15632 T-15413	1,205 1,253	1,205 1,253	Brgy. Briones, Kalibo, Aklan
July 17, 2017	DDD	P-33879	6,942	6,942	Brgy. Briones, Kalibo, Aklan
July 17, 2017	Heirs of EEE	2016000153	32,974	32,974	Brgy. Briones, Kalibo, Aklan

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax and documentary stamp tax pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279.

It is, however, understood that this 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.

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 26th day of February, 2019.

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

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