May 22, 2019

CERTIFICATE OF TAX EXEMPTION NO. 294-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **VICENTE T. LAO CONSTRUCTION** with Taxpayers Identification Number (TIN) 000-000-000-000, a private 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 (RA) 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 procurement of house and lot packages under the National Housing Authority (NHA)'s Yolanda Permanent Housing Program, to wit:

Date of Notice of Award	Date of Contract Agreement	Contract Price	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
Nov. 03, 2016	Nov. 21, 2017	P_____	Lanao Unity Park Homes	Brgy. Lanao, Daanbantayan, Cebu	1,000 housing units

However, the purchases of goods/articles by **VICENTE T. LAO 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 **VICENTE T. LAO CONSTRUCTION** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the following Deed of Absolute Sale executed by the Landowners in favor of the NHA over the parcel of land described below, to wit:

Copyright 2020 CD Technologies Asia, Inc.

Date	Name of Landowners	Transfer Certificate of Title (TCT) No.	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
Oct. 19, 2017	Spouses AAA and BBB	TP-28275	89,356	87,358 [1]	Bo. of Lanao, Municipality of Daanbantayan, Province of Cebu

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax (CGT) and documentary stamp tax (DST) pursuant to Sections 19 and 20 of 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 (RD) to effect transfer of the land title 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 CTE 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 May, 2019.

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

Footnotes

1. Net of the perpetual of right of way donated in favor to the Government, consisting of 1,998 square meters, more or less.

Copyright 2020 CD Technologies Asia, Inc.