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

Certificate of Tax Exemption No.
CMP - 0306 - 2020

CERTIFICATE OF TAX EXEMPTION

issued to

Name of Seller	TIN	Address
Philippine Investment Two (SPV-AMC), Inc. represented by Carlos Gaudencio M. Mañalac		Unit 1603 (formerly at unit 1615)Ayala Tower One, Ayala Avenue cor. Paseo de Roxas, Makati City

-and-

Name of Homeowners Association (HOA)	TIN	Address
Maabi - Abihon Homeowners' Association, Inc.		Maabi-abihon Brgy. Punta, Taytay, Bacolod City, Negros Occidental

This certifies that the Deed of Absolute Sale entered by the Seller and the HOA dated January 08, 2019 over a parcel of land described below, to wit;

Transfer Certificate of Title	Area (sq.m.)	Transferred (sq.m.)	Area of CMP (sq.m.)	Location
	3,510	3,510	3,510	Brgy. Road, Punta, Taytay, Bacolod City, Negros Occidental

being a Community Mortgage Program (CMP)[1], **is not subject** to capital gains tax pursuant to Section 32 (b) of Republic Act (RA) No. 7279 or the Urban Development and Housing Act of 1992. The transaction is, however, **subject** to **documentary stamp tax** under Section 196 of the 1997 Tax Code, as amended.

It is, however, understood that this Certificate of Tax Exemption is never intended and shall not be construed as giving authority to the concerned Register of Deeds to effect transfer of the land title in the name of the buyer without the necessary certificate of authority to register issued by this Bureau. In this regard, this Certificate shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the Certificate Authorizing Registration (CAR). The CAR shall only be issued after the submission of the requirements provided under Revenue Memorandum Order (RMO) No. 15-2003.

The Bureau of Internal Revenue (BIR) shall conduct verification and post-audit that the actual occupants of the property transferred under the CMP are qualified beneficiaries and therefore, the seller is entitled to exemption from capital gains tax or income tax imposed under Sections 24 (D)(1) and/or 27 (D)(5) the 1997 Tax Code, as amended.

This Certificate 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 JUN 0 8 2020, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] Shall be proportionately distributed to the association's qualified member-beneficiaries (See Annex)