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

Certificate of Tax Exemption No:
310-2018

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **PERSAN CONSTRUCTION INC.** (TIN: 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, on its income received directly in connection with the construction/development of socialized housing units under the 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 15, 2017	October 10, 2017		Barotac Nuevo People's Village	Brgy. Baras, Barotac Nuevo, Iloilo	275

However, the purchases of goods/articles by **PERSAN CONSTRUCTION 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 **PERSAN CONSTRUCTION INC.** must issue VAT-Exempt official receipts on its gross receipts from the said socialized housing project.

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

Date of Deed of Absolute Sale	Name of Landowner/Seller	Transfer Certificate of Title No.	Area (Sq.m.)	Area Transferred	Location
November 6, 2017	Heirs of Estrella Valera and Mariano Araneta				Barrio of Baras, Barotac Nuevo, Iloilo

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax and documentary stamp tax under 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 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.

CTE No. 310-2018
Date issued 3-5-2018

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 MAR 0 5 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue

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