August 8, 2019

CERTIFICATE OF TAX EXEMPTION NO. 441-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **DUMDUMA CONSTRUCTION AND TRADING CORPORATION** (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 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
October 25, 2017	July 20, 2018	P273,517,359.73	Sta. Cruz People's Village	Brgy. Sta. Cruz, Pandan Site 1a, Antique	1,000

However, the purchases of goods/articles by **DUMDUMA CONSTRUCTION AND TRADING CORPORATION** 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 **DUMDUMA CONSTRUCTION AND TRADING CORPORATION** 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 Landowner in favor of the NHA over the parcels of land described below, to wit:

Date of Deed of Sale	Name of Landowner/Seller	Transfer Certificate of Title No.	Area (Sq.m.)	Area Transferred (Sq.m.)	Location
September 18, 2018	AAA [1]	P-00000	60,986	60,986	Brgy. Sta. Cruz, Pandan, Antique
September 18, 2018	BBB [2]	P-00000	47,160	47,160	Brgy. Sta. Cruz, Pandan, Antique

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which shall be used for the above-mentioned socialized housing project, are 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 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 8th day of August, 2019.

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

Footnotes

1. Represented by Atty-in-Fact, CCC, by virtue of Special Power of Attorney dated January 17, 2018.
2. Represented by Atty-in-Fact, DDD, by virtue of Special Power of Attorney dated August 24, 2018.

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