August 29, 2019

CERTIFICATE OF TAX EXEMPTION NO. 460-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **SUMMERHILLS HOME DEVELOPMENT CORP.** [1] with Taxpayers Identification Number (TIN) 000-000-000-000, is exempt from income tax and creditable withholding tax (CWT) pursuant to Section 20 (d) (1) 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 its sale of socialized house and lot units for residential and dwelling purposes to qualified beneficiaries in **Heneral Dos**, consisting of **525** [2] house and lot units, located at Brgy. Pasong Kawayan II, General Trias, Cavite, a project duly registered with the Housing and Land Use Regulatory Board (HLURB) under Certificate of Registration No. 25831 and License to Sell No. 029018 both dated July 10, 2014, provided that the selling price of said house and lot units does not exceed P450,000.00 [3] for house and lot packages.

Moreover, the sale by **SUMMERHILLS HOME DEVELOPMENT CORP.** of residential lot valued at P1,919,500.00 and below, or house and lot and other residential dwellings valued at P3,199,200.00 and below, is exempt from value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended. Provided, however, that beginning January 01, 2021, the exemption from VAT shall only apply to sale of house and lot and other residential dwellings [4] with selling price of not more than P2,000,000.00.

Furthermore, the Deed of Absolute Sale executed by the Landowner in favor of **SUMMERHILLS HOME DEVELOPMENT CORP.** over the parcel of land described below, to wit:

Date	Name of Landowner	Transfer Certificate of Title (TCT) No.	Area (sq. m.)	Transferred (sq. m.)	Location

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November 12, 2012	BDO Unibank, Inc. [5]	T-1021919	119,016	119,016	Brgy. Pasong Kawayan, General Trias, Cavite

in so far as the area corresponding to the **525** house and lot units is concerned, is not subject to capital gains tax (CGT) and VAT pursuant to Section 20 (d) (2) of RA No. 7279, as amended, and Section 109 (1) (P) of the National Internal Revenue Code of 1997, as amended.

It is observed, however, that documentary stamp tax (DST) is not one of the taxes covered by the tax exemption clause in Section 20 of RA No. 7279. Thus, the documents conveying the properties shall be subject to DST imposed under Section 196 of the National Internal Revenue Code of 1997, as amended, based on the consideration contracted to be paid for such realties or on their fair market value determined in accordance with Section 6 (E) of the same Code, whichever is higher. Likewise, the sale of the 30 lots and 223 lots and units classified as Economic Housing, [6] not being covered by RA No. 7279, as amended, shall be subject to the payment of appropriate taxes.

The grant of tax exemption herein is subject to the compliance with the provisions of applicable BIR rules and regulations and the Terms and Conditions stated in Annex "A" hereof. The Company is liable, however, for other applicable taxes not discussed above.

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 29th day of August, 2019.

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

ANNEX A

TERMS AND CONDITIONS
OF THE CERTIFICATE OF TAX EXEMPTION

1. The exemption from income, creditable withholding taxes and VAT covers only income directly attributable to the revenues generated from the **525** socialized house and lot units in **Heneral Dos** located at Brgy. Pasong Kawayan II, General Trias, Cavite.

2. The developer shall submit the sworn statement of the buyer that he is eligible as a

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socialized housing beneficiary under Section 5 (A) of Revenue Regulations (RR) No. 11-97 to the BIR during the processing of the Certificate Authorizing Registration (CAR) for the transfer of the title of the socialized housing unit.

3. It is understood that the Certificate Authorizing Registration (CAR) shall only be issued after it is established upon proper verification by the Revenue District Officer (RDO) concerned that, considering the rules on valuation of real property, the actual selling price per sale transaction of the socialized house and lot packages in this case does not really exceed P450,000.00.

Footnotes

1. Formerly: SM Property Sales, Inc.
2. 88 lots/units in compliance to Section 18 of RA No. 7279 is credited to the Main Project.
3. Pursuant to HLURB License to Sell No. 029018 dated July 10, 2014.
4. Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
5. Doing business under any of the following names and styles: BDO, BDO Unibank, Banco De Oro, Banco De Oro Unibank, BDO Banco De Oro [Formerly: Banco De Oro Unibank, Inc.]
6. Per License to Sell No. 029019 dated July 10, 2014.

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