April 3, 2018

CERTIFICATE OF TAX EXEMPTION NO. 579-18

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **HI-TRI DEVELOPMENT CORPORATION** (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, on its income received directly in connection with the construction/development of socialized housing units 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
October 24, 2014	September 23, 2016 [1]	P_____ [2]	Maya Park Homes	Brgy. Maya, Daan Bantayan, Cebu	650 units

However, the purchases of goods/articles by **HI-TRI DEVELOPMENT 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 **HI-TRI DEVELOPMENT CORPORATION** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

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

Date of the Deed of Absolute Sale	Name of Landowner	Transfer Certificate of Title (TCT)	Area (Sq. m.)	Area Transferred (Sq. m.)	Location

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October 27, 2016	AAA	TCT No. 102-2016003650 [3]	55,425	55,425	Brgy. Maya, Daan Bantayan Cebu

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax and documentary stamp tax 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 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 3rd day of April, 2018.

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

Footnotes

1. Date of Acknowledgment.
2. As stated in the Notice of Award dated October 24, 2014.
3. Already in the name of NHA under TCT No. 102-2017006440.

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