October 11, 2019

CERTIFICATE OF TAX EXEMPTION NO. 591-19

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN :

This certifies that **ST. FRANCIS SQUARE LAND, INC. doing business under the name and style of TIFFANY VILLAGE**, with Taxpayer Identification Number 000-000-000-000, is exempt from income tax and creditable withholding tax on its income received directly in connection with its economic and low-cost housing project, **Tiffany Village (horizontal)**, consisting of **114** house and lot units used solely for family home or dwelling purposes, located at Brgy. Makiling, Calamba, Laguna, a project duly registered with the Board of Investments (BOI) under Registration No. 2017-102 dated April 21, 2017, for a period of **4** years beginning from **July 2017** or actual start of commercial operations/selling, whichever is earlier, but in no case earlier than the date of registration of the project with the BOI, pursuant to Executive Order No. 226, otherwise known as the "Omnibus Investments Code of 1987" and Section 2.57.5 (B) (2) of Revenue Regulations No. 2-98, as amended.

Moreover, the sale by the Company 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 VAT-exempt under Section 109 (1) (P) of the 1997 Tax Code, as amended. Provided, however, that beginning January 1, 2021, the VAT exemption shall only apply to sale of house and lot and other residential dwellings [1] with selling price of not more than Two Million Pesos (P2,000,000.00).

The sale of house and lot units in excess of the 114 house and lot units registered with the BOI, if any, including those units used for commercial purposes such as leasing, retail stores, offices, etc., are subject to appropriate taxes under the National Internal Revenue Code of 1997, as amended.

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 at the back hereof. The Company is liable, however, for all 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.

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Issued this 11th day of October, 2019.

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

Footnotes

1. Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.

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