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

Certificate of Tax Exemption No:
#676-2017
12/29/2017

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **CUMBERLAND DEVELOPMENT CORPORATION,** with Tax Identification Number is exempt from income tax, creditable withholding tax (CWT) and value-added tax (VAT) pursuant to Section 20 of Republic Act (RA) No. 7279 on its income received directly in connection with its sale of socialized housing units to qualified beneficiaries in **Centennial De Calamba,** consisting of **671** units, located at Brgy. Looc, Calamba, Laguna, a project duly registered with the Housing and Land Use Regulatory Board (HLURB) under Certificate of Registration No. nd License to Sell No. , provided that the ceiling price per house and lot package does not exceed and for lot only.

Nonetheless, it is observed that documentary stamp tax (DST) is not one of the taxes covered by the tax exemption clause in Section 20 of RA No. 7279. Such being the case, the owner/project developer/seller shall be liable to pay the documentary stamp tax on the documents conveying the properties imposed under Section 196 of the Tax 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.

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.

Issued this _____ day of DEC 29 2017.

CAESAR R. DULAY
Commissioner of Internal Revenue
012185

K-1-JAC

[1] The maximum selling price is pegged at 300,000.00 based on HLURB License to Sell No

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 **671** socialized housing units in **Centennial De Calamba**, located at **Brgy. Looc, Calamba, Laguna**.

2. The developer shall submit the sworn statement of the buyer that he is eligible as a 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 P300,000.00 and P120,000.00 for lot only.

4. List of Non-saleable lots per HLURB License to Sell No. , granted by the HLURB, Region VI-A, Quezon City, to wit:

Block 1	– Parking Area	
Block 7	– Lot 28	- Community Facilities
Block 12	– Lot 20	- Community Facilities
Block 12	– Lot 19	- Parks/Playgrounds
Block 16	– Lot 4	- Parks/Playgrounds
Block 26	– Lot 12	- Parks/Playgrounds
Block 30	– Lot 14	- Parks/Playgrounds
Block 30	– Lot 13	- Reserved Area