**REVENUE MEMORANDUM CIRCULAR NO. 45-2025** issued on April 30, 2025 circularizes the Cooperative Development Authority (CDA), Department of Finance (DOF), and Bureau of Internal Revenue Joint Administrative Order No. 001-2025 titled "Rules to Implement the Penalty Provision Under Section 308 of the National Internal Revenue Code (NIRC) of 1997, as Amended by Republic Act (RA) No. 11534, Otherwise Known as the Corporate Recovery and Tax Incentives for Enterprises (CREATE) Act, as Implemented by Department of Finance, Department of Trade and Industry Joint Administrative Order (DOF-DTI JAO) No. 001-2023, issued on 09 March 2023".

Section 308 of the NIRC of 1997, as amended by the CREATE Act, and Rule IV (Penalties) of the DOF-DTI JAO No. 001-2023, prescribe the penalties for non-compliance with the filing and reportorial requirements by cooperatives registered with the CDA and officials or employees of the CDA.

The guidelines of the Order shall govern the imposition of appropriate penalties for the failure to submit mandated reports on tax incentives and benefits data as required under Section 305 of the NIRC of 1997, as amended, covering the taxable year 2023 and onwards of all CDA-registered cooperatives with a valid and subsisting Certificate of Tax Exemption (CTE) and availing of incentives, and officials and/or employees of the CDA.

The following Sections are specified in the DOF, CDA and BIR JAO No. 001-2025:

a. Section 1. Legal Bases
b. Section 2. Scope and Coverage
c. Section 3. Reportorial Requirements
d. Section 4. Punishable Acts
e. Section 5. Penalties
f. Section 6. Effect of Revocation of CTE
g. Section 7. Procedures
h. Section 8. Payment of Fines by Installment
i. Section 9. Exempting Circumstances
j. Section 10. Request for Reconsideration
k. Section 11. Role of the CDA
l. Section 12. Submission of Reports to the FIRB
m. Section 13. Grace Periods
n. Section 14. Transitory Provisions
o. Section 15. Repealing Clause
p. Section 16. Effectivity