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

Certificate of Tax Exemption No:
BOI - LEH - [redacted]487 - 2020

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **CITYLAND DEVELOPMENT CORPORATION**, with Taxpayers Identification Number (TIN) , is exempt from income tax and creditable withholding tax on its income received directly in connection with its low-cost mass housing project, **Grand Central Residences Tower 1, EDSA cor. Sultan Street, Barangay Highway Hills, Mandaluyong City,** consisting of **776** residential units used solely for family home or dwelling purposes, located at EDSA cor. Sultan Street, Barangay Highway Hills, Mandaluyong City, a project duly registered with the Board of Investments (BOI) under Registration No. dated June 16, 2010, for a period of **four (4) years** beginning from **June 2010** 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 (RR) 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 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[1] with selling price of not more than P2,000,000.00.

However, the sale of residential units in excess of the **776** residential units registered with the BOI (per HLURB License to Sell No. the excess is 428 units), as well as the 106 commercial units and 242 parking slots, including those units used for commercial purposes such as leasing, retail stores, offices, etc., shall be subject to the payment of 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.

Issued this _____ day of AUG 20 2020 ______.

CAESAR R. DULAY
Commissioner of Internal Revenue

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