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

Certificate of Tax Exemption No: 352-2018

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **GRANBY TRADING & CONSTRUCTION** (TIN: an 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 (Php)	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
February 01, 2016	March 23, 2016		Granville Residences - Site 1	Brgy. Bagacay, San Dionisio, Iloilo	
February 01, 2016	March 23, 2016		Granville Residences - Site 2	Brgy. Bagacay, San Dionisio, Iloilo	

However, the purchases of goods/articles by **GRANBY TRADING & CONSTRUCTION** shall be subject to VAT, even if the said purchases are to be used for the said socialized housing projects, since VAT is an indirect tax which can be passed on by the seller of the goods/services. It shall be understood that **GRANBY TRADING & CONSTRUCTION** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing projects.

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

Date	Name of Landowner	Transfer Certificate of Title (TCT)	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
May 24, 2016	Violeta King Lopez[1] represented by Peter Paul K. Lopez by virtue of a Special Power of Attorney[2] dated October 8, 2015				Brgy. Bagacay, San Dionisio, Iloilo

[1] Co-owner of a certain parcel of land covered by TCT No. with an area of 831,828 square meters, more or less, one half (1/2) of which is considered her conjugal share with her late husband Carlos D. Lopez, Jr. who died sometime on November 26, 1986. An Affidavit of Ownership was submitted dated May 02, 2016 declaring ownership over her one half (1/2) conjugal share (under Doc. No. 131, Page No. 28, Book No. XL, Series of 2016, of Atty. Modesto Martin Y. Mamon, Notary Public).

[2] Under Doc. No. 54, Page No. 12, Book No. XXXIX, Series of 2015, of Atty. Modesto Martin Y. Mamon, Notary Public

[3] Lot 3-B-4, of the subdivision plan, being a portion of Lot 3-B

May 24, 2016	Violeta King Lopez represented by Peter Paul K. Lopez by virtue of a Special Power of Attorney[4] dated October 8, 2015	TCT No.			Brgy. Bagacay, San Dionisio, Iloilo

which shall be used for the above-mentioned socialized housing projects, is not subject to capital gains tax and documentary stamp tax (DST) pursuant to Sections 19 and 20 of RA No. 7279[6].

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 CTE 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 MAR 08 2018.

CAESAR R. DULAY
Commissioner of Internal Revenue
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[4] Under Doc. No. 54, Page No. 12, Book No. XXXIX, Series of 2015, of Atty. Modesto Martin Y. Mamon, Notary Public

[5] Lot 3-B-5, of the subdivision plan, being a portion of Lot 3-B, which is part of the conjugal share of Violeta King Lopez

[6] The tax exemption does not cover estate tax due, if any, on the transfer of the properties from the deceased landowner (Carlos D. Lopez, Jr.) to his respective heirs.