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

Certificate of Tax Exemption No:
PSH - 273 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **RAEMULAN LANDS, INC.,** with Taxpayer Identification Number is exempt from income tax and creditable withholding tax (CWT) pursuant to Section 20 (d) (1) of Republic Act (RA) No. 7279, as amended by RA No. 10884 (Balanced Housing Development Program Amendments) dated July 17, 2016, on its income received directly in connection with its sale of socialized house and lot units for residential and dwelling purposes to qualified beneficiaries in **Pasinaya Homes Prime North**, consisting of **2,350**[1] house and lot units located at **Brgy. Timalan, Naic, Cavite**, a project duly registered with the Department of Human Settlements and Urban Development (DHSUD) under Provisional Certificate of Registration No. and Provisional License to Sell No. ooth dated May 10. 2021, provided that the selling price of said house and lot units does not exceed P 0[2]per house and lot packages.

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[3] and below, is exempt from value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code (Tax 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[4]valued at P3,199,200.00.

Furthermore, the Deeds of Absolute Sale executed by the Landowners in favor of **RAEMULAN LANDS, INC.** over the parcels of land described below, to wit:

Date	Name of Landowners	Transfer Certificate of Title (TCT) Nos.	Area (sq. m.)	Transferred (sq. m.)	Location
Dec. 03, 2018	Ricardo G. Ong married to Julie Ong		20,231	20,231	
			29,863	29,863	
Sept 24, 2018	Mylene T. Lim		39,738	39,738	
Dec 03, 2018	Misael Adelaida P. Soliman		30,030	12,909	
			27,158	27,158	
Dec. 07, 2018	Evelyn K. Chua		27,984	27,984	
April 30, 2020	Marie Tes C. Lee		29,731	29,731	
Total			**204,735**	**187,614**	

in so far as the 109,116.11[11] square meters are concerned, which shall be used for the abovementioned socialized housing project are not subject to capital gains tax (CGT) pursuant

[1] Per Provisional License to Sell No. . **2,350** house and lot units are authorized for sale.
[2] The maximum selling price is pegged at per house & lot based on DHSUD Provisional License to Sell No
[3] As adjusted using the 2010 Consumer Price Index values pursuant to Revenue Regulation (RR) No. 8-2021 dated June 11, 2021
[4] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No 10963.
[5] Already in the name of Raemulan Lands, Inc. under TCT No.
[6] Already in the name of Raemulan Lands, Inc. under TCT No.
[7] Already in the name of Raemulan Lands, Inc. under TCT No and formerly part of TCT No.
[8] Already in the name of Raemulan Lands, Inc. under TCT No.
[9] Already in the name of Raemulan Lands, Inc. under TCT No
[10] Already in the name of Raemulan Lands, Inc. under TCT No.
[11] Per Provisional Certificate of Registration No. igned by the DHSUD

CTE No. PSH2 73 - 2021
Date issued________________

to Section 20 (d) (2) of RA No. 7279, as amended, and to VAT pursuant to Section 109 (1) (P) of the Tax Code of 1997, as amended.

It is observed, however, that documentary stamp tax (DST) is not one of the taxes covered by the tax exemption clause in Section 20 of RA No. 7279. Thus, the documents conveying the properties shall be subject to DST 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. Likewise, lots/units classified as Economic Housing, not being covered by RA No. 7279, shall be subject to the payment of appropriate taxes.

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 hereof. The Company is liable, however, for all other applicable taxes not enumerated 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 JUL 30 2021, ______.

CAESAR R. DULAY
Commissioner of Internal Revenue

044292

K-1-MDT

CTE No. CSH-273-2321
Date issued JUL 30 2021

TERMS AND CONDITIONS
OF THE CERTIFICATE OF TAX EXEMPTION

1. The exemption from income and creditable withholding taxes covers only income directly attributable to the revenues generated from the project, **Pasinaya Homes Prime North** consisting of **2,350** house and lot units, located at **Brgy. Timalan, Naic, Cavite.** Such exemption shall cover revenues from **2,350** house and lot units with selling price not exceeding per house and lot packages.

2. The developer shall submit the sworn statement of the buyer that he is eligible as a socialized housing beneficiary provided under Section 5 (A) of Revenue Regulation (RR) No. 11-97 to the Bureau of Internal Revenue (BIR) during the processing of the Certificate Authorizing Registration (CAR) for the transfer of the socialized housing unit.

3. It is understood that the 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 house and lot packages in this case does not really exceed F