REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
NSH- 441 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **WTG Construction & Development Corp. / RDY Constructor – Joint Venture**, an entity engaged by the **National Housing Authority (NHA),** is exempt from project-related income taxes/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 the land development and construction of 1,305 socialized housing units in **Municipality of Sta. Fe Sites 1 & 2**, a socialized housing project of the NHA under the NHA's Yolanda Permanent Housing Program through fund transfer to the Municipality of Santa Fe, Cebu, located at Brgys. Ocoy and Balidbid, Santa Fe, Cebu.

Moreover, the delivery of the said 1,305 socialized housing units shall be 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 that the selling price thereof does not exceed P3,199,200.00 per house and lot package; provided further, 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 P3,199,200.00.[2]

However, the purchases of goods/articles by **WTG Construction & Development Corp. / RDY Constructor – Joint Venture** shall be subject to VAT, even if the said purchases are to be used for the socialized housing project, since VAT is an indirect tax which can be passed on by the seller of the goods/services. It shall be understood that **WTG Construction & Development Corp. / RDY Constructor – Joint Venture** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Furthermore, the following Deeds executed by the Landowner/s in favor of the Local Government of Santa Fe, Cebu, over the parcels of land described below, to wit:

Deeds	Date	Name of Landowner/s	Tax Declaration Nos.	Area Transferred (Sq. m.)	Location
Extra Judicial Settlement of an Estate with Deed of Absolute Sale of a Portion of a Parcel of Land	Oct. 22, 2021	Heir/s of Azucena Ilustrisimo[3]		3,302	Brgy. Ocoy Santa Fe, Cebu
				3,302	

---

[1] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
[2] As adjusted using the 2010 Consumer Price Index values per Revenue Regulations (RR) No. 8-2021 dated June 11, 2021.
[3] This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of Azucena Ilustrisimo.

Deeds	Date	Name of Landowner/s	Tax Declaration Nos.	Area Transferred (Sq. m.)	Location
Deed of Absolute Sale	Oct. 22, 2021	Rudico P. Ilustrisimo		7,212	Brgy. Ocoy Santa Fe, Cebu
Extra Judicial Settlement of an Estate with Deed of Absolute Sale of a Portion of a Parcel of Land	Oct. 22, 2021	Heir/s of Zosimo P. Ilustrisimo[4]		7,212	
Deed of Absolute Sale	Oct. 22, 2021	Thelma I. Torrefiel		7,212	
Extra Judicial Settlement of an Estate with Deed of Absolute Sale of a Portion of a Parcel of Land	Oct. 22, 2021	Heir/s of Maria Ilustrisimo[5]		3,302 3,302 3,302	
Deed of Absolute Sale	Oct. 22, 2021	Medmar T. Quijada		10,554	
Extra Judicial Settlement of an Estate with Deed of Absolute Sale of a Portion of a Parcel of Land	Oct. 22, 2021	Heir/s of Lucrides P. Ilustrisimo[6]		1,300	
Deed of Absolute Sale	Nov. 17, 2021	Sps. Roque Forrosuelo and Marietta Marfa Forrosuelo		30,719	Brgy. Balidbid Santa Fe, Cebu
Deed of Absolute Sale	Nov. 17, 2021	Elizabeth Bulotano Sevilleno		5,401	

which shall be used for the above mentioned socialized housing project, are not subject to income tax/capital gains tax/expanded withholding tax pursuant to Section 20 of RA No. 7279 and to VAT pursuant to Section 109 (1) (P) of the Tax Code of 1997, as amended. However, the Deeds are subject to documentary stamp tax imposed under Section 196 of the Tax Code of 1997, as amended, based on the actual consideration of the properties transferred, considering that one of the contracting parties is the Government.

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 to effect transfer of the land titles in the name of the NHA without the necessary certificate of authority to register 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 Certificate

[4] This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of Zosimo P. Ilustrisimo.
[5] This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of Maria Ilustrisimo.
[6] This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of Lucrides P. Ilustrisimo.

Authorizing Registration (CAR). The CAR shall only be issued after submission of the complete requirements provided under Revenue Memorandum Order (RMO) No. 15-2003.

Upon application for exemption, a lien on the titles of the land shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to a socialized housing project pursuant to RA No. 7279.

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 DEC 06 2021 ______.

CAESAR R. DULAY
Commissioner of Internal Revenue
047532

KI