REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No:
PSH - 430 - 2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **LYNVILLE REALTY & DEVELOPMENT CORPORATION**[1] 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 to qualified beneficiaries in **Lynville Residences Lemery,** consisting of **511**[2] socialized house and lot units, located at Brgy. Mataas na Bayan, Lemery, Batangas, a project duly registered with the Housing and Land Use Regulatory Board (HLURB)[3] under Certificate of Registration No. [illegible] and License to Sell No. 0[illegible]

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 (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] with selling price of not more than P3,199,200.00.[5]

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 at the back hereof. The Company is liable, however, for 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 NOV 11 2022.

LILIA CATRIS GUILLERMO
Commissioner of Internal Revenue

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[1] Now: Lynville Land Development Corp.
[2] Out of the total 511 house and lot units, 139 house and lot units shall not be sold for more than ₱450,000.00 per unit; while the 372 house and lot units enumerated, identified and stated at the back hereof shall not be sold for more than ₱480,000.00 per unit.
[3] Now: Department of Human Settlements and Urban Development (DHSUD).
[4] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
[5] As adjusted using the 2010 Consumer Price Index values pursuant to Revenue Regulations (RR) No. 8-2021 dated June 11, 2021.

TERMS AND CONDITIONS
OF THE CERTIFICATE OF TAX EXEMPTION

1. The exemption from income tax and creditable withholding tax covers only income directly attributable to the revenues generated from the **511** socialized house and lot units in **Lynville Residences Lemery** located at Brgy. Mataas na Bayan, Lemery, Batangas.

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

3. It is understood that the Certificate Authorizing Registration (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 socialized house and lot packages in this case does not really exceed P450,000.00 on the 139 house and lot units and P480,000.00 on the 372 house and lot units.

4. The following socialized house and/or lot units are to be sold with maximum selling price of P480,000.00 per unit per DHSUD's letter dated April 16, 2019 granting the upgrading of selling price from P450,000.00 to P480,000.00:

Block	Lot	Units
4	67 to 73; 76 to 87; 90 to 103	33
8	11, 13 to 16; 19 to 26; 35 to 37; 39; 41; 43; 45; 47 to 57	31
9	10; 12 to 27; 33; 35 to 49; 52; 54; 56	36
10	5; 7; 9; 11; 13 to 27; 33; 35 to 45; 47 to 55	40
11	3 to 28; 33 to 56; 58	51
12	3 to 26; 31 to 56	50
13	3 to 32	30
14	3 to 32	30
15	2 to 13; 16 & 17	14
16	3 to 33	31
17	3 to 27; 29	26
	Total	**372**