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

Certificate of Tax Exemption No.
BOI-LEH-0652-2020

CERTIFICATE OF TAX EXEMPTION

TO WHOM IT MAY CONCERN:

This certifies that **CITIHOMES BUILDER AND DEVELOPMENT, INC.** with Taxpayer's Identification Number (TIN) [redacted] is exempt from income tax and creditable withholding tax on its income received directly in connection with its economic and low-cost housing project, **Amaris Homes Dasma Ph. 2**, consisting of **1,061** house and lot units used solely for family home or dwelling purposes located at Brgy. Burol Main, Dasmariñas City, Cavite, a project duly registered with the Board of Investments (BOI) under Registration No. [redacted] dated March 4, 2020, for a period of **4** years beginning from **March 4, 2020** or actual start of commercial operation/selling, whichever is earlier, but in no case earlier that 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 No. 2-98, as amended.

Moreover, the sale by the Company of residential lots 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 VAT-exempt under Section 109(1)(P) of the 1997 National Internal Revenue Code (Tax Code), as amended. Provided, however, that beginning January 1, 2021, the VAT exemption shall only apply to sale of house and lot and other residential dwellings[1] with selling price of not more than Two Million Pesos (P2,000,000.00).

The sale, however, of house and lot units in excess of the **1,061** house and lot units registered with the BOI, (per HLURB License to Sell No. [redacted] the excess is 77 house and lot units), including those units used for commercial purposes such as leasing, retail stores, offices, etc., shall be subject to the applicable taxes under the 1997 Tax Code, 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 DEC 0 2 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 1, 2021 pursuant to RA No. 10963.