



REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Certificate of Tax Exemption No:
NSH-434-2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **BUMBARAN DEVELOPMENT CORPORATION**, an entity engaged by the **Sarimagdaleno Village Homeowners Association, Inc. (SVHOAI)**¹, is exempt from project-related income tax and creditable withholding tax 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 development/ construction of 431² socialized housing units in Sarimagdaleno Village located at Brgy. Olaycon, Monkayo, Compostela Valley under the TS Pablo Rehabilitation Plan (PRP) thru the Community Initiative Approach Program (CIAP) of the **National Housing Authority**. Moreover, the delivery of 431 socialized housing units shall be exempt from value-added tax (VAT) pursuant to Section 109 (1)(P) of the National Internal Revenue Code of 1997, as amended, provided that the selling price/value thereof does not exceed P3,199,200.00³ 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 dwellings⁴ with selling price of not more than P3,199,200.00.

However, the purchases of goods/articles by **BUMBARAN DEVELOPMENT CORPORATION**, 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 **BUMBARAN DEVELOPMENT CORPORATION** must issue VAT Exempt official receipts on its gross receipts from the said socialized housing project.

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 Per Contract Agreement dated April 24, 2014.

² The 225 socialized housing units originally covered under BIR Ruling No. 500-2014 dated December 29, 2014 was increased to 431 socialized housing units as approved by the NHA in its letter dated November 12, 2014.

³ As adjusted using the 2010 Consumer Price Index values per Revenue Regulation 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.