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

Certificate of Tax Exemption No:
PSH- 482 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that SERVEQUEST PROPERTIES CORPORATION with Taxpayer's Identification Number 0 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 Cabanatuan East, consisting of 318 house and lot units, located at Brgy. Kalikid Sur, Cabanatuan City, Nueva Ecija, a project duly registered with the Department of Human Settlements and Urban Development (DHSUD) under Certificate of Registration No. and License to Sell No. , provided that the selling price of said units does not exceed P530,000 for Blk. 49 Lots 1-54; Blk. 50 Lots 1-54; Blk. 61 Lots 1-54; and Blk. 62 Lots 7-15, and P580,000 for Blk. 51 Lots 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 26; Blk. 53 Lot 16; Blk. 58 Lots 23-40; and Blk. 60 Lots 1-42 per house and lot package.[1]

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 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[2] with selling price of not more than P3,199,200.00.[3]

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 National Internal Revenue 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 ____________, ______.

CAESAR R. DULAY
Commissioner of Internal Revenue

K1-FR-21-1048

047967

[1] Per HLURB License to Sell No. dated August 14, 2019.
[2] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
[3] As adjusted using the 2010 Consumer Price Index values per Revenue Regulations No. 8-2021 dated June 11, 2021.

CTE No. PSH-482-2021
Date issued DEC 22 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 318 socialized house and lot units in Cabanatuan East, located at Brgy. Kalikid Sur, Cabanatuan City, Nueva Ecija.

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 Bureau of Internal Revenue (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 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 P530,000 for Blk. 49 Lots 1-54; Blk. 50 Lots 1-54; Blk. 61 Lots 1-54; and Blk. 62 Lots 7-15, and P580,000 for Blk. 51 Lots 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 26; Blk. 53 Lot 16; Blk. 58 Lots 23-40; and Blk. 60 Lots 1-42.