REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
**BUREAU OF INTERNAL REVENUE**

**Certificate of Tax Exemption No:**
NCH-0559-2020

# CERTIFICATE OF TAX EXEMPTION

This certifies that the Deed of Absolute Sale (DOAS) executed by **ATLANTICA REALTY DEVELOPMENT CORPORATION** in favor of the **National Housing Authority (NHA)** over the parcels of land described below, to wit:

| Date of Deed of Absolute Sale | Name of Sellers | Transfer Certificate of Title No. | Aggregate Area (sq. m.) | Area Transferred | Location of Property |
|---|---|---|---|---|---|
| November 5, 2019 | Atlantica Realty Development Corporation | | 12,285 sq. m. | 12,285 sq. m. | Mapulang Lupa, Pandi, Bulacan |
| | | | 13,362 sq. m. | 13,362 sq. m. | |

with respect to the . l square meter portion of the aforesaid lots, which shall be used for the **Pandi Village 2 (Expansion Area) Resettlement Project,** with **577** developed lots/housing units, located at Brgy. Mapulang Lupa, Pandi, Bulacan, a socialized housing project of the NHA intended for informal settler families affected by the Construction of the Harborlink Project Segment 10, Phase 2, of the Department of Transportation (DOTR) under the Build Build Program of the government, is **not subject to creditable withholding tax/capital gains tax, documentary stamp tax** and **value-added tax** pursuant to Sections 19 and 20 of Republic Act (RA) No. 7279 and Section 109 (1) (P) of the Tax Code of 1997, as amended.

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 Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under RMO No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

Upon application for exemption, a lien on the title of the land shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same is to be applied or is being applied to a socialized housing project pursuant to RA 7279.

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 SEP 2 9 2020.

**CAESAR R. DULAY**
Commissioner of Internal Revenue

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