REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No: 0431-2019

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **EDDMARI CONSTRUCTION AND TRADING/KIT PROPERTIES INC- JV** (TIN:), an entity engaged by the National Housing Authority (NHA), is exempt from project-related income taxes, creditable withholding tax and value added tax (VAT), pursuant to Section 20 (d)(1) and (3) of Republic Act 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 construction/development of socialized housing units under the NHA's Yolanda Permanent Housing Program, to wit:

Date of Notice of Award	Date of Contract Agreement	Contract Price (Php)	Project Name	Location	No. of Socialized Housing Units subject of tax exemption
November 3, 2016	April 2, 2018		Barasan-Bolilao People's Village	Brgy. Barasan and Bolilao, Dumangas, Iloilo	500

However, the purchases of goods/articles by **EDDMARI CONSTRUCTION AND TRADING/KIT PROPERTIES INC- JV** 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 **EDDMARI CONSTRUCTION AND TRADING/KIT PROPERTIES INC- JV** must issue VAT-Exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deed of Absolute Sale/ Unilateral Sale Executed by the Landowner in favor of the NHA over the parcels of land described below, to wit:

Date of Deed of Absolute Sale	Name of Landowner/Seller	Original Certificate of Title No.	Area (Sq. m.)	Area Transferred (Sq. m.)	Location
January 29, 2018	KIT PROPERTIES INC.		16,359 26,830	38,000[1]	Brgy. Barasan and Bolilao, Dumangas, Iloilo

which shall be used for the above-mentioned socialized housing project, is not subject to capital gains tax and documentary stamp tax under Sections 19 and 20 of Republic Act (RA) No. 7279.

It is, however, understood that this CTE is never intended, and shall not be construed, as giving authority to concerned Register of Deeds to effect transfer of the land titles in the

[1] Portion of the area covered by TCT Nos.

CTE No. 0431-2019
Date issued JUL 30 2019

name of the buyer without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

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 JUL 30 2019, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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