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

Certificate of Tax Exemption No: NSH- 451-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **HI-TRI DEVELOPMENT CORPORATION,** an entity engaged by the **National Housing Authority (NHA)**[1], is exempt from project-related income taxes 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 construction/development of **250** socialized housing units in **CDO Midland Valley Homes,** a socialized housing project of NHA under the NHA's Community–Based Initiative Approach (CBIA) Program intended formerly for the members/families of the Armed Forces of the Philippines (AFP) and the Philippine National Police (PNP) but re-allocated to Qualified Former Rebel's Housing Project located at Brgy. Mambuaya, Dansolihon, Cagayan de Oro City.

Moreover, the delivery of the said **250** 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 (Tax Code), as amended, provided that the selling price thereof does not exceed P3,199,200.00 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 dwellings[2] with selling price of not more than P3,199,200.00[3].

However, the purchases of goods/articles by **HI-TRI DEVELOPMENT CORPORATION** shall be subject to VAT, even if the said purchases are to be used for the said 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 **HI-TRI 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 DEC 09 2021, _____.

CAESAR R. DULAY
Commissioner of Internal Revenue
047686

K-1-MDT

[1] Per Memorandum of Agreement dated November 12, 2015.
[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 Regulation No. 8-2021 dated June 11, 2021.