REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
NSH- 376 - 2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **Filinvest Land, Inc.** is exempt from project-related income taxes/creditable withholding tax (CWT) and value-added tax (VAT) pursuant to Section 20 (d) (1) and (3) of Republic Act (RA) No. 7279, on its income received directly in connection with the development of a forty-eight (48) hectare property located at Brgy. Muzon, City of San Jose Del Monte, Bulacan, consisting of 7,045[1] socialized housing units also known as **Pabahay 2000 Program**, for delivery to the Republic of the Philippines.

However, the purchases of goods/articles by **Filinvest Land, Inc.** shall be subject to VAT, even if the said purchases are to be used for the above-mentioned 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 **Filinvest Land, Inc.** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Moreover, the Deed of Transfer and Acceptance dated June 26, 1998 made and executed by and between Filinvest Alabang, Inc.[2], National Housing Authority (NHA), and the Republic of the Philippines, where the NHA through its Board of Directors accepted the transfer of the said 7,045 socialized housing units also known as **Pabahay 2000 Program** located at Brgy. Muzon, City of San Jose Del Monte, Bulacan, for administration and disposition to qualified beneficiaries on behalf of the National Government, is not subject to income tax/capital gains tax/expanded withholding tax and documentary stamp tax pursuant to Sections 19 and 20 of RA No. 7279.

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 (RD) to effect transfer of the land titles in the name of the NHA without the necessary Certificate Authorizing Registration (CAR) issued by this Bureau. In this regard, this CTE, together with the documentary requirements provided under Revenue Memorandum Order (RMO) No. 15-2003, shall be presented to the Revenue District Office (RDO) concerned in order for the latter to issue the CAR.

This CTE 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 OCT 0 6 2021 _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

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[1] While the Memorandum of Agreement dated February 12, 1997 entered into by and between the Housing and Urban Development Coordinating Council (HUDCC), Public Estate Authority (PEA), and the NHA, where the President of the Philippines approved the recommendation of the NHA that it will administer 7,093 socialized housing units at San Jose del Monte, Bulacan, the exemption from project-related income tax/CWT and VAT covers only income received directly in connection with the development of 7,045 socialized housing units per Deed of Transfer and Acceptance dated June 26, 1998 made and executed by and between Filinvest Alabang, Inc., NHA, and the Republic of the Philippines and the NHA Resolution No. 3920 dated March 23, 1998.

[2] Appointed Attorney-in-fact of Filinvest Land, Inc.