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

Certificate of Tax Exemption No:
NSHP [illegible]43-2021

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **New Bilrey Construction & Development Corporation,** with Taxpayer Identification Number (TIN) an entity engaged by the **National Housing Authority (NHA),** is exempt from project-related income taxes/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 the acquisition of 1,500 socialized lots and completed housing units in **Rancho Verde 1**, a socialized housing project of the NHA under the Supreme Court Mandamus Program thru the Community Based Initiative Approach (CBIA), located at Brgy. Malainen, Naic, Cavite, intended for the families affected by the Supreme Court's Mandamus to clean-up the Manila Bay Area.

Moreover, the delivery of the said 1,500 socialized lots and completed housing units shall be exempt from value-added tax (VAT) pursuant to Section 109 (1) (P) of the National Internal Revenue Code (Tax Code) of 1997, 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[1] with selling price of not more than P3,199,200.00.[2]

However, the purchases of goods/articles by **New Bilrey Construction & Development Corporation** 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 **New Bilrey Construction & Development Corporation** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Furthermore, the Deeds of Absolute Sale executed by the Landowner/s in favor of the NHA over the parcels of land described below, to wit:

Date	**Name of Landowner/s**	**Transfer Certificate of Title (TCT) Nos.**	**Aggregate Area (Sq. m.)**	**Area Transferred for NHA Utilization (Sq. m.)**	**Location**
Undated	Teresa Martha V. Avendaño, Graciano Fidel V. Avendaño, Thelma Marie V. Avendaño, & Teila Matilda V. Avendaño		65,942	65,942 (portion)	Naic, Cavite
Undated	Heirs of Teodoro G. Vasquez[3] & Rebecca P. Vasquez		27,371	27,371	
December 10, 2018	Adoracion Alaman & Corazon Alaman		24,866	24,866	
December 10, 2018	Rosa Unawa & Flordeliza V. Bernal		26,353	26,353	

[1] Sale of lot only, regardless of the price, shall be subject to VAT starting January 01, 2021 pursuant to RA No. 10963.
[2] As adjusted using the 2010 Consumer Price Index values per Revenue Regulations (RR) No. 8-2021 dated June 11, 2021.
[3] This Certificate of Tax Exemption does not cover estate tax due, if any, on the estate of Teodoro G. Vasquez.

which shall be used for the above mentioned socialized housing project, 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 and to VAT pursuant to 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 necessary certificate of authority to register 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 Certificate Authorizing Registration (CAR). The CAR shall only be issued after submission of the complete requirements provided under Revenue Memorandum Order (RMO) No. 15-2003.

Upon application for exemption, a lien on the titles of the land shall be annotated by the Register of Deeds having jurisdiction over the properties, to the effect that the same are to be applied or are being applied to a socialized housing project pursuant to RA No. 7279.

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 DEC 0 6 2021 _____.

CAESAR R. DULAY
Commissioner of Internal Revenue

KI

№ 047584