REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

Quezon City

Certificate of Tax Exemption No:
NSH - 298 - 2022

CERTIFICATE OF TAX EXEMPTION

TO ALL WHOM IT MAY CONCERN:

This certifies that **Shalom Construction, Inc.**, 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/procurement of 479 fully developed lots and completed housing units in **Pandan Spring Subdivision**, a socialized housing project of the NHA under the NHA's Yolanda Permanent Housing Program, located in the Municipality of Pandan, Antique.

Moreover, the delivery of the said 479 fully developed 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] valued at P3,199,200.00.[2]

However, the purchases of goods/articles by **Shalom Construction, 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 **Shalom Construction, Inc.** must issue VAT-exempt official receipts on its gross receipts from the said socialized housing project.

Furthermore, the Deed of Absolute Sale made and executed by and between the Landowner/s and the NHA over the parcels of land described below, to wit:

Date	Name of Landowner/s (Administrator/Beneficial User)	Tax Declaration (TD) No/s.	Area Transferred (sq. m.)	Location
June 08, 2022	Bonifacio Candari (Ismael F. Candari)			
	Bonifacio Candari (Teodolfo C. Gabor)[3]			
	Bonifacio Candari (Herminia C. Fabella)			
	Bonifacio Candari (Edgar C. Gabor)			

[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] Per TD No. the registered name of the Administrator/Beneficial User is Teodulo C. Gabor, Jr.

which shall be used for the above mentioned socialized housing project, are **not subject**[4] 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/Assessors Office 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 No. (RMO) 15-2003.

Upon application for exemption, a lien on the titles of the lands shall be annotated by the Register of Deed/Assessors Office having jurisdiction over the property, 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 JUN 2 0 2022, ____.

CAESAR R. DULAY
Commissioner of Internal Revenue
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[4] This CTE does not include exemption from estate tax which may be due, if any, on the estate of the deceased registered landowner/s