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CONTACT US



www.GSElawfirm.com



Trunk (632) 8633-9757 to 58 /
8634-2935 / 8636-9345 to 46



[instagram.com/GSELawFirm](https://www.instagram.com/GSELawFirm)



Suite 2801 Discovery Center
25 ADB Avenue, Ortigas Center
Pasig City 1605 Philippines



[facebook.com/GSELawFirm](https://www.facebook.com/GSELawFirm)



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REPUBLIC ACT NO. 12214 - CAPITAL MARKETS EFFICIENCY PROMOTION ACT (CMEPA)

AN ACT AMENDING SECTIONS 22, 24, 25, 27, 28, 32, 34, 38, 39, 42, 51, 52, 56, 57, 127, 149, 174, 176, 179, 190, 199, AND 258 OF REPUBLIC ACT NO. 8424, OTHERWISE KNOWN AS THE NATIONAL INTERNAL REVENUE CODE OF 1997, AS AMENDED, AND FOR OTHER PURPOSES

On 29 May 2025, President Ferdinand R. Marcos, Jr. signed into law Republic Act (RA) No. 12214 or the Capital Markets Efficiency Promotion Act (CMEPA). The law aims to enhance the competitiveness and inclusivity of the Philippine capital markets. By amending key provisions of the National Internal Revenue Code, the law aims to reduce investment costs, simplify tax structures, and encourage broader participation among Filipinos.

The salient features of the new law include the following:

Expanded the definition of “Securities” and added the definition of “Passive Income”	
Current	CMEPA
<ul style="list-style-type: none"> • “Securities” - shares of stock in a corporation and rights to subscribe for or to receive such shares. The term includes bonds, debentures, notes or certificates, or other evidence or indebtedness, issued by any corporation, including those issued by a government or political subdivision thereof, with interest coupons or in registered form. 	<p>“Securities” - shares, participation, or interest in a corporation, commercial enterprise, or profit-making venture evidenced by a certificate, contract, or instrument, whether written or electronic in character, which shall include:</p> <ol style="list-style-type: none"> 1. Shares of stock, bonds, debentures, notes, evidence of indebtedness, and asset-backed securities; 2. Investment contracts, certificates of interest, or participation in a profit-sharing agreement, such as certificates of deposit for a future subscription; 3. Fractional undivided interests in oil, gas, or other mineral rights; 4. Certificates of assignment, certificates of participation, trust certificates, voting trust certificates, or similar instruments; 5. Proprietary or non-proprietary membership certificates in corporations; and 6. Other similar instruments as may be determined by the Securities and Exchange Commission. <p>“Passive Income” - any income that is earned from sources that do not require a taxpayer’s active pursuit and performance of trade or business and is not subject to VAT.</p>
Stock Transactions Tax	
Current	CMEPA
<ul style="list-style-type: none"> • 0.6% of the gross selling price or gross money in value of the shares of stock • Applies only to disposal of shares listed and traded through a local stock exchange 	<ul style="list-style-type: none"> • 0.1% of the gross selling price or gross money in value of the shares of stock • Now applies on disposal of shares listed and traded through a local stock exchange and disposal of shares of a domestic corporation listed in a foreign stock exchange
Standardization of the tax on interest income	
Current	CMEPA
<ul style="list-style-type: none"> • Interest income of resident individuals earned from Foreign Currency Deposit Units (FCDU) is subject to 15% final tax • Interest income from long term deposits and investments are exempt from tax 	<ul style="list-style-type: none"> • All interest income received from any currency bank deposit, deposit substitutes, trust funds, or other similar financial arrangements are now uniformly subjected to a final tax of 20%, except for non-resident aliens not engaged in trade or business and non-resident foreign corporations, whose interest income will still be subject to 25% final tax.
Documentary Stamp Tax (DST)	
Current	CMEPA
<ul style="list-style-type: none"> • DST on the original issuance of shares: 1% of the shares’ par value • DST on original issuance of certificates, redemption, and disposition of Unit Investment Trust Funds (UITFs): 1% of the par value 	<ul style="list-style-type: none"> • DST on the original issuance of shares: 0.75% of the shares’ par value • DST on original issuance of certificates, redemption, and disposition of Unit Investment Trust Funds (UITFs): Exempt

(Republic Act No. 12214 - CMEPA - continued)

Capital Gains Tax (CGT) on the sale of shares issued by Foreign Corporations	
Current	CMEPA
<ul style="list-style-type: none"> 15% CGT is only imposed on sale or disposal of shares issued by domestic corporations not traded on a stock exchange Any gains on sales of foreign shares are subject to the progressive income tax rate for individuals and the 25% income tax rate for corporations 	<ul style="list-style-type: none"> 15% CGT is also now imposed on the sale or disposal of shares issued by foreign corporations not traded on a stock exchange
Deductions from Gross Income of Employer's Contribution to Personal Equity and Retirement Account (PERA)	
Current	CMEPA
<ul style="list-style-type: none"> No deduction 	<ul style="list-style-type: none"> Additional deduction of 50% of the employer's actual contributions made to personal equity and retirement accounts under RA No. 9605 (Personal Equity and Retirement Account of 2008) shall be granted to private employers that contribute at least equal to the contributions of their employees, subject to the maximum allowable contribution under RA No. 9605
Additional Exclusions from Gross Income, Interest Income, and Gains from the Sale or Disposal of Project Specific Bonds & Gains from Redemption of Unit Investment Trust Fund (UITF)	
Current	CMEPA
<ul style="list-style-type: none"> No exclusion 	<ul style="list-style-type: none"> Interest Income and Gains from the Sale or Disposal of Project Specific Bonds: Specific Bonds that are issued by the Republic of the Philippines or any of its instrumentalities to finance capital expenditures or programs covered by the Philippine Development Plan or its equivalent and other high-level priority programs of the national government. Gains from redemption of Unit Investment Trust Fund (UITF): Gains realized by the investor upon redemption of shares of stock in a Mutual Fund or Unit Investment Trust Fund
Excise Tax on automobiles	
Current	CMEPA
<ul style="list-style-type: none"> Pick-ups are exempt from excise tax 	<ul style="list-style-type: none"> Pick-ups shall now be subject to excise tax

[Click here for the full text of RA No. 12214 \(CMEPA\)](#)

REPUBLIC ACT NO. 12215 – PHILIPPINE AGRICULTURISTS ACT

AN ACT REGULATING THE PRACTICE OF THE AGRICULTURE PROFESSION IN THE PHILIPPINES, CREATING FOR THE PURPOSE A PROFESSIONAL REGULATORY BOARD FOR AGRICULTURISTS, AND APPROPRIATING FUNDS THEREFOR

On 29 May 2025, R.A. No. 12215 was enacted into law, creating the Professional Regulatory Board of Agriculture (Board). The Board has the power, among others, to supervise and regulate the licensure, registration, and practice of registered agriculturists.

A professional licensure examination for agriculturists shall be conducted by the Board. An average of at least 75% in all subjects with no rating below 50% must be obtained in order to pass. If the examinee obtains a general weighted average of 75% but obtains a rating below 50% in any subject, the examinee shall be allowed to retake the exam in the subject where the rating is below 50%. Examinees who fail to pass the examination thrice shall be required to undergo a refresher course before being allowed to retake the exam.

Subject to qualifications provided under the law, an applicant may be registered as an agriculturist without taking the exam. Those who qualify for registration shall be required to take an Oath of Professional before entering into the practice of the agriculture profession. The law also prohibits the unauthorized practice of the agriculture profession.

[Click here for the full text of RA No. 12215](#)

STATUTE

REPUBLIC ACT NO. 12216 – NATIONAL HOUSING AUTHORITY ACT

STRENGTHENING THE NATIONAL HOUSING AUTHORITY THROUGH AN EXTENDED CORPORATE TERM AND RATIONALIZED POWERS

On 29 May 2025, R.A. No. 12216 or the “National Housing Authority Act” was enacted to strengthen the National Housing Authority (NHA) by extending its corporate existence and streamlining its powers and functions. This law repeals Presidential Decree No. 757, which originally created the NHA, and provides an updated legal framework for addressing the country’s housing challenges.

The Act reaffirms the State’s commitment to providing decent, affordable, and climate-resilient housing, especially to underprivileged and homeless citizens, through sustainable and inclusive community development. The NHA’s corporate life is extended by twenty-five (25) years beginning 31 July 2025, and its authorized capitalization is increased from Php5 Billion to Php10 Billion. The Act also vests the NHA with broad powers, including the ability to acquire land, enter into public-private partnerships, issue bonds, implement resettlement programs, and exercise the right of eminent domain. It establishes a Disaster and Emergency Response Housing Office (DERHO) and grants the NHA tax and regulatory fee exemptions.

Oversight is provided by a reconstituted Board of Directors chaired by the Secretary of the Department of Human Settlements and Urban Development (DHSUD). The NHA is mandated to adopt transparent and participatory practices in housing project planning and implementation, and to work closely with LGUs, other government agencies, and the private sector. A mandatory performance review is required every five (5) years to ensure the agency remains effective and responsive.

[Click here for the full text of RA No. 12216](#)

BANKING

BSP MEMORANDUM NO. M-2025-016 - IMPLEMENTATION OF THE INTERNATIONAL TRANSACTIONS REPORTING SYSTEM (ITRS)

On 15 May 2025, the Bangko Sentral ng Pilipinas (BSP) issued Memorandum No. M-2025-016, amending certain provisions of BSP Memorandum No. M-2024-020 dated 20 June 2024. The earlier memorandum laid down the initial guidelines and implementation schedule for the enhanced International Transactions Reporting System (ITRS), which aims to streamline the reporting of cross-border transactions and improve the quality, accuracy, and timeliness of external sector statistics.

Memorandum No. M-2025-016 revises the timeline for the ITRS implementation in response to feedback from reporting banks and project stakeholders. The extension is intended to provide adequate time for banks and the BSP Project Team to address various technical challenges and reporting issues that have emerged during the preparatory and testing phases.

Under the revised implementation schedule outlined in the latest memorandum, the ITRS rollout is now as follows:

Schedule	Activity
June 2025 – May 2026	Extension of testing period
01 June 2026	ITRS Full Implementation

[Click here for the full text of BSP Memorandum No. M-2025-016](#)

BSP CIRCULAR NO. 1213, SERIES OF 2025 - AMENDMENTS TO REGULATIONS ON INFORMATION TECHNOLOGY RISK MANAGEMENT TO IMPLEMENT SECTION 6 OF THE ANTI-FINANCIAL ACCOUNT SCAMMING ACT (AFASA)

The BSP issued Circular No. 1213, Series of 2025, providing amendments to the Regulations on Information Technology Risk Management to implement Section 6 of the Anti-Financial Account Scamming Act (AFASA).

The Circular amended Section 148 of the Manual of Regulations for Banks (MORB) and provided definitions for new terms such as blacklist screening, bot detection, browser automation, device fingerprinting, emulators, Fraud Management Systems (FMS), geolocation monitoring, jailbroken or rooted device, kill switch, money lock, rate limiting, screen scraping, scripts, session management, transaction velocity checks, and unsecure merchants. The Circular mandated BSP-Supervised Financial Institutions (BSFIs) to implement the new fraud rules and mechanisms to ensure the robustness of their FMS.

[Click here for the full text of BSP Circular No. 1213, Series of 2025](#)

Related Law: [Republic Act No. 12010 - Anti-Financial Account Scamming Act \(AFASA\)](#)

BSP CIRCULAR NO. 1214, SERIES OF 2025 - RULES OF PROCEDURE ON THE CONDUCT OF INQUIRY INTO FINANCIAL ACCOUNTS AND SHARING OF FINANCIAL ACCOUNT INFORMATION BY THE BSP PURSUANT TO THE ANTI-FINANCIAL ACCOUNT SCAMMING ACT (AFASA)

On 30 May 2025, the BSP issued Circular No. 1214, Series of 2025, which lays down the rules of procedure for the conduct of inquiry into financial accounts and sharing of account information by the BSP, pursuant to R.A. No. 12010 or the “Anti-Financial Account Scamming Act” (AFASA). The rules provide that the laws on secrecy of deposits and data privacy do not apply to financial accounts under inquiry or investigation by the BSP.

Requests to inquire into a Financial Account must be filed by a “Competent Authority” which includes:

1. The Philippine National Police (PNP), National Bureau of Investigation (NBI), Department of Justice (DOJ), Anti-Money Laundering Council (AMLC), Cybercrime Investigation and Coordinating Center (CICC), or any other government duly authorized by law to investigate and/or prosecute the prohibited acts under the AFASA; or
2. Financial Regulators which are authorized to investigate crimes or offenses related to their respective regulatory functions and adjudicate financial consumer complaints under Section 6(f) of the Financial and Services Consumer Protection Act (FCPA).

These requests must be filed with the Consumer Account Protection Office (CAPO) which is the duly constituted office within the BSP authorized to inquire into Financial Accounts and share Financial Account Information with Competent Authorities.

The request shall contain the purpose and justification for an inquiry, description of the Financial Account, details of the prohibited act that was committed, and how the Financial Account subject of the request has been involved or utilized in its commission, and scope of the transactions, among others.

The Competent Authority shall also enter into an “Information Sharing Agreement” with the BSP containing the terms and conditions for the sharing of Financial Account Information.

The CAPO shall then issue an “Inquiry Order” to the institution concerned upon its determination that there exists a sufficient ground to establish a well-founded belief that a prohibited act has been committed and that the Financial Account may be involved in its commission.

Within ten (10) days from receipt of the Inquiry Order, the institution shall submit to CAPO a “Return on the Inquiry Order” providing therein all the Financial Account Information required, as well as other relevant supporting documents. The CAPO shall also furnish the Competent Authority with its response to the request for inquiry containing the relevant Financial Account information and other related documents gathered.

The rules further provide that the CAPO shall have the authority to apply for cybercrime warrants and/or to issue preservation orders with respect to electronic communications involved in the commission of a prohibited act.

 [Click here for the full text of BSP Circular No. 1214, Series of 2025](#)

BSP CIRCULAR NO. 1215, SERIES OF 2025 - REGULATIONS ON THE TEMPORARY HOLDING OF FUNDS SUBJECT OF DISPUTED TRANSACTIONS AND COORDINATED VERIFICATION PROCESS

On 30 May 2025, the BSP issued Circular No. 1215, Series of 2025, providing the regulations for the temporary holding of funds subject of disputed transactions and coordinated verification process to implement Sections 7 to 11 of the AFASA.

Under this circular, Bangko Sentral-Supervised Institutions (BSIs) are authorized to temporarily hold disputed funds for a period of not more than thirty (30) calendar days, which may be extended only by the courts. Simultaneously, BSIs and account owners shall initiate a coordinated verification process to validate a disputed transaction.

The beneficiary account owner, whose funds are subjected to temporary holding, may challenge the same or request it to be lifted by providing evidence to substantiate the legitimacy of the disputed transaction.

Notably, during the verification process, the provisions of R.A. No. 1405 (Secrecy of Bank Deposits), R.A. No. 6426 (Foreign Currency Deposit Act of the Philippines), R.A. No. 8367 (Revised Non-Stock Savings and Loan Association Act of 1997), and R.A. No. 10173 (Data Privacy Act) are inapplicable.

BSIs shall lift the temporary holding of disputed funds and release the same to the beneficiary account owner upon the lapse of the initial or extended holding of disputed funds, or at any time upon confirmation of the legitimacy of the disputed transaction.

BSIs that fail to temporarily hold funds subject of a disputed transaction shall be liable for loss or damage, including the restitution of the disputed funds to the account owner. BSIs are further administratively liable for improperly holding funds or holding funds beyond the allowable period.

 [Click here for the full text of BSP Circular No. 1215, Series of 2025](#)

REVENUE REGULATIONS NO. 15-2025 - REVISED PRIVATE RETIREMENT BENEFIT PLAN REGULATIONS

The Bureau of Internal Revenue (BIR) issued Revenue Regulations (RR) No. 15-2025 to update the rules on the tax treatment of retirement benefits under private retirement plans, pursuant to Sections 244 and 245 of the Tax Code. The new regulations define the requirements, benefits, and compliance obligations for what is now referred to as a "Tax Qualified Plan."

A Tax Qualified Plan is a retirement plan that has been formally approved by the BIR. Once a Certification of Tax Qualification has been issued, it offers several tax benefits including:

1. Exemption from income and withholding tax of the retirement benefits and all amounts received by officials and employees of private firms on account of their retirement;
2. Exemption from income and withholding tax of the trust income from various investments made by the trustees of an employer's trust under Section 60(b) of the Tax Code;
 - The income from investment in shares of stocks listed and traded in the local stock exchange, however, shall be subject to the stock transaction tax.
3. Tax deductibility of the following contributions made by employers from its gross income:
 - Contributions to the trust during the taxable year to cover the pension of the liability accrued during that year ("Normal Cost"); and
 - Contributions to the trust during the taxable year in excess of the Normal Cost but only if such amount (i) has not been allowed as a deduction, and (ii) is apportioned in equal parts over a period of ten (10) consecutive years beginning with the year in which the transfer of payment is made.

To be eligible for these tax incentives, the following conditions must be met:

1. The plan itself must be reasonable;
2. The retiring employee must be at least fifty (50) years old and must have worked for the same employer for at least ten (10) years; and
3. The employee must not have previously availed of similar retirement tax benefits from the same or another employer.

To be "Reasonable Retirement Plan", the plan must:

1. Be in writing and must include all the terms necessary for qualification;
2. Be a continuing program, unless discontinued for valid business reasons;
3. Must cover either percentage or classification basis:
 - Percentage basis - at least seventy percent (70%) of employees, excluding those with short tenure, part-time employees (working twenty [20] hours or less per week), and seasonal workers (working five months or less per year); or
 - Classification basis - limited to a specific group, provided it does not favor highly paid individuals, officers, shareholders, or supervisors;
4. Both employers and employees may contribute to a trust fund established under the plan;
5. This fund must be used solely for the benefit of the employees or their beneficiaries;
6. The contributions and benefits must not discriminate in favor of top-level employees;
7. The benefits already funded must be non-forfeitable in case the plan is terminated; and
8. Any forfeitures due to resignation, death, or other reasons must not be redistributed to increase the benefits of other employees before the plan ends.

Employers are required to apply for a Certificate of Tax Qualification with the BIR's Legal and Legislative Division within thirty (30) days from the effectivity date of the retirement plan. The application must include specific documentary requirements and payment of applicable fees, as outlined in the regulations.

Trustees of qualified retirement plans must also file an annual information return by April 15 of each year, along with a copy of the Certificate of Tax Qualification. For non-trusteed or insured retirement plans, the fund custodians must continue to file regular income tax returns for investment earnings, which remain taxable.

REVENUE MEMORANDUM CIRCULAR NO. 46-2025 - REVISED PEOPLE'S FREEDOM OF INFORMATION MANUAL OF THE BUREAU OF INTERNAL REVENUE AND UPDATED LIST OF FOI RECEIVING OFFICERS

On 07 May 2025, the BIR issued RMC No. 46-2025 to confirm the BIR's consistent compliance and commitment to institutionalize within the agency, Executive Order (EO) No. 2, s. 2016 (Freedom of Information Program).

The BIR published the following documents to ensure full compliance and observance of the FOI Program:

1. Bureau of Internal Revenue's FOI Manual;
2. List of FOI Receiving Officers as of December 2024;
3. One-Page FOI Manual;
4. BIR FOI Request Process Flowchart;
5. List of Exceptions to the Right of Access of Information; and
6. "No Wrong Door Policy" workflow and guidelines.

 [Click here for the full text of RMC No. 46-2025](#)


REVENUE MEMORANDUM CIRCULAR NO. 47-2025 - CLARIFYING THE PROVISIONS OF REVENUE REGULATIONS NO. 03-2025, IMPLEMENTING REPUBLIC ACT NO. 12023 IMPOSING THE VALUE-ADDED TAX ON DIGITAL SERVICES


On 07 May 2025, the BIR issued RMC No. 47-2025 to clarify RR No. 03-2025, implementing R.A. No. 12023 which imposes Value-Added Tax (VAT) on digital services.

All Non-Resident Digital Service Providers (NRDSPs) are required to register or update their registration with the BIR. Thus, NRDSPs whose sales from the Philippines only constitute Business-to-Business (B2B) are likewise required to register with BIR for VAT purposes. Furthermore, they are still required to file their tax returns with the BIR to report their B2B transactions.

NRDSPs can register with the BIR through the Online Registration and Update System (ORUS) of the BIR website. They can register through the VAT on Digital Services portal once it is available.

Registration must be accomplished by 01 June 2025. Otherwise, applicable penalties under Section 13 of RR No. 03-2025 shall be imposed, and if warranted, suspension of its business operations under Section 12.

 [Click here for the full text of RMC No. 47-2025](#)

Related Issuance:  [Revenue Regulations No. 03-2025](#)


REVENUE MEMORANDUM CIRCULAR NO. 48-2025 - CLARIFICATION ON THE COMPUTATION OF EXCISE TAX ON MINERAL PRODUCTS

On 08 May 2025, the BIR issued RMC No. 48-2025 to clarify the computation of excise tax on mineral products pursuant to RR No. 01-2018 and RMC No. 12-2024.

Under the Circular, the applicable foreign exchange (forex) rate to be used in computing the excise tax, both provisional and final, shall be based on the official rates published by the Bankers Association of the Philippines (BAP). For exported mineral products, the provisional excise tax shall use the BAP spot rate on the date of shipment, evidenced by the bill of lading.

For domestic sales denominated in foreign currency, the provisional excise tax shall use the BAP spot rate as of the date of application for the permit to transport, while the final tax shall be based on the weighted average BAP rate as of the date of the final sales invoice.

The final invoice for exports must be issued within ninety (90) days from the date of exportation. In cases where provisional payments result in overpayment due to forex fluctuations, taxpayers may file a claim for refund under Section 229 of the National Internal Revenue Code (NIRC) of 1997, as amended. Such claims must be filed within two (2) years from the date of payment and comply with existing documentation and procedures.

 [Click here for the full text of RMC No. 48-2025](#)

REVENUE MEMORANDUM CIRCULAR NO. 49-2025 - AVAILABILITY OF OFFLINE ELECTRONIC BUREAU OF INTERNAL REVENUE FORMS (EBIRFORMS) PACKAGE VERSION 7.9.5

On 07 May 2025, the BIR issued RMC No. 49-2025 providing for the new Offline Electronic Bureau of Internal Revenue Forms (eBIRForms) Package v.7.9.5, with the following updates:

1. BIR Form No. 1702Q January 2018 (ENCS) [Quarterly Income Tax Return for Corporations, Partnerships and Non-Individual Taxpayers], which shall be filed within sixty (60) days following the close of each of the first three (3) quarters of the taxable year, whether calendar or fiscal year; and
2. BIR Form No. 2550Q April 2024 (ENCS) [Quarterly Value-Added Tax (VAT) Return], which shall be filed not later than the 25th day following the close of each taxable quarter, whether calendar or fiscal year. This return is also available in the Electronic Filing and Payment System (eFPS), so eFPS filers/users shall use the eFPS in the filing of such return and payment of the corresponding tax due thereon.
3. Inclusion of all Alphanumeric Tax Codes (ATCs) of BIR Form No. 2551Q (Quarterly Percentage Tax Return) to BIR Form No. 0605;
4. Addition of new Treaty Code “BN” for Brunei in BIR Form No. 1601-FQ;
5. Bug fixes for BIR Forms 0619-E, 1800v2018, 1801v2018, and 2000-OTv2018; and
6. New ATCs in BIR Form Nos. 0605, 1600-VT, 1601-EQ, and 1601-FQ.

 [Click here for the full text of RMC No. 49-2025](#)

REVENUE MEMORANDUM ORDER NO. 22-2025 - AMENDING THE GUIDELINES IN THE PROCESSING AND ISSUANCE OF CERTIFICATE OF TAX EXEMPTION UNDER REVENUE MEMORANDUM ORDER NO. 38-2019 (TAX EXEMPTION OF NON-STOCK, NON-PROFIT CORPORATIONS UNDER SECTION 30 OF THE NATIONAL INTERNAL REVENUE CODE, AS AMENDED)

On 29 April 2025, the BIR issued Revenue Memorandum Order (RMO) No. 22-2025 providing amendments to RMO No. 38-2019 to recognize the exemption from taxes, duties, and other assessments granted to legitimate labor organizations of seafarers by the Republic Act (R.A.) No. 12021 or the Magna Carta of Filipino Seafarers and to provide the guidelines in availing of the tax exemptions.

As a non-stock, non-profit entity, a legitimate labor organization of seafarers does not need to apply for a Certificate of Tax Exemption (CTE) but must submit, upon registration as a taxpayer at the Revenue District Office (RDO) having jurisdiction over their principal place of business, the following documents:

1. Certified true copy of the latest Articles of Incorporation (AOI) and By-Laws issued by the Securities and Exchange Commission (SEC). The AOI must expressly state the following provisions:
 - a. The organization is a non-stock, non-profit corporation or association;
 - b. No part of the organization's net income shall inure to the benefit of any private individual;
 - c. The trustees of the organization do not receive any compensation or remuneration; and
 - d. In case of dissolution, its assets shall be distributed to one or more entities formed for purpose/s similar to its own, or to the Philippine government for public purpose.
2. Original certification under oath by an executive officer of the corporation or association as to:
 - a. Full description of its past, present, and proposed activities;
 - b. The sources and disposition of income;
 - c. Detailed description of all revenues which it seeks to be exempted from income tax;
 - d. Amount of income, compensation, salaries, or any emoluments paid by the corporation or association to its trustees, officers and other executive officers; and
3. Certified true copy of the certification from the Department of Labor and Employment (DOLE) that it is included in the register of legitimate labor organizations to the RDO where it is registered within sixty (60) days from the effectivity of the Implementing Rules and Regulations (IRR) of RA No. 12021.

Legitimate labor organizations of seafarers no longer need to apply for a CTE to avail of the tax exemptions, without prejudice to the conduct of post-audit investigation and/or investigation by the concerned RDO having jurisdiction over their principal place of business.

Upon filing of their Annual Income Tax Returns, legitimate labor organizations shall attach an updated certified true copy of the certification from the DOLE of their inclusion in the register of legitimate labor organizations to remain eligible for the tax exemptions under RA No. 12021.

Legitimate labor organizations shall inform the RDO where they are registered in case of cancellation of their DOLE registration or non-inclusion in the register. Noncompliance shall be subject to the applicable penalties under pertinent laws and revenue issuances.

 [Click here for the full text of RMO No. 22-2025](#)

REVENUE MEMORANDUM ORDER NO. 26-2025 - MODIFICATION OF ALPHANUMERIC TAX CODE (ATC) OF SELECTED REVENUE SOURCE UNDER REPUBLIC ACT (RA) NO. 12066, OTHERWISE KNOWN AS CORPORATE RECOVERY AND TAX INCENTIVES FOR ENTERPRISES MAXIMIZE OPPORTUNITIES FOR REINVIGORATING THE ECONOMY (CREATE MORE) ACT

On 15 April 2025, the BIR modified the description of the following Alphanumeric Tax Code (ATC) to facilitate the proper identification and monitoring of payment for creditable withholding tax pursuant to the issuance of RR No. 005-2025 in relation to the CREATE MORE Act (RA No. 12066):

ATC	BIR Form No.	Existing ATC Description	New ATC Description
WI820 WC820	1601-EQ / 2307	On one-half (½) of the gross remittances by e-marketplace operators to the sellers/merchants for the goods or services sold/paid through their platform/facility Individual Corporate	On the gross remittances by e-marketplace operators to the sellers/merchants for the goods or services sold/paid through their platform/facility Individual Corporate
WI830 WC830	1601-EQ / 2307	On one-half (½) of the gross remittances by digital financial services to the sellers/merchants for the goods or services sold/paid through their platform/facility Individual Corporate	On the gross remittances by e-marketplace operators to the sellers/merchants for the goods or services sold/paid through their platform/facility Individual Corporate

[Click here for the full text of RMO No. 26-2025](#)

REVENUE MEMORANDUM ORDER NO. 27-2025 - CREATION OF ALPHANUMERIC TAX CODE (ATC) FOR VALUE-ADDED TAX (VAT) ON LOCAL SALES OF REGISTERED BUSINESS ENTERPRISES (RBES)

The BIR created a new ATC to identify and monitor the payment of Value-Added Tax (VAT) on local sales of Registered Business Enterprises (RBES):

ATC	Description	Tax Rate	Legal Basis	BIR Form No.
WV110	VAT on Local Sales of RBES	12%	RR No. 9-2025	0605 / 1600-VT / 2307

[Click here for the full text of RMO No. 27-2025](#)

REVENUE MEMORANDUM ORDER NO. 28-2025 - AMENDING CERTAIN PROVISIONS AND ANNEX A OF REVENUE MEMORANDUM ORDER NO. 46-2024

On 22 May 2025, the BIR issued RMO No. 28-2025, amending certain provisions of RMO No. 46-2024, including its Annex A.

RMO No. 46-2024 outlines the policies, guidelines, and procedures for preparing and submitting progress reports on the programs, projects, and activities under the BIR Strategic Plan for 2024-2028.

RMO No. 28-2025 revises Annex A of RMO No. 46-2024, which details the format and content of the Quarterly Progress Report.

[Click here for the full text of RMO No. 28-2025](#)


JURISPRUDENCE

G.R. NO. 256648 - RODRIGUEZ VS. GREGORIO PASTORFIDE, RAMONA MATIBAG, CECIL L. MONTEBLANCO, AND ROLAND AGUSTIN ANGELES, IN THEIR PURPORTED CAPACITIES AS MEMBERS OF THE BOARD OF DIRECTORS OF MEDICAL PLAZA MAKATI CONDOMINIUM CORPORATION

Peter Rico Rodriguez filed a petition challenging the qualifications of respondents Gregorio Pastorfide, Ramona Matibag, Cecil Montebancho, and Roland Angeles to sit on the Board of Directors of the Medical Plaza Makati Condominium Corporation (MPMCC). He argued that they were not eligible to serve as directors because they were not individual unit owners, but merely representatives of corporate members, Pastorfide Land Corporation and Maxicare Health Corporation.

The Supreme Court ruled in favor of the Respondents. It held that under MPMCC's By-Laws, corporate-members are allowed to designate natural persons to act on their behalf, including for purposes of being elected to and serving on the Board. Since corporations are juridical entities and cannot act on their own, they must do so through duly authorized representatives.

The Court further clarified that in situations involving corporate-members, it is the corporation, not its representative, that is considered the actual member of the Board. The representative simply acts in the name and interest of the corporate-member. Thus, by authorizing the Respondents to sit on the Board, the corporate members were validly exercising their right to participate in the governance of MPMCC as members in good standing. The presence of the representatives on the Board was lawful, as they were merely acting on behalf of the corporate-members who are the true members occupying those seats.

 [Click here for the full text of Rodriguez vs. Pastorfide, et al.](#)

LOCAL GOVERNMENT


BUREAU OF LOCAL GOVERNMENT FINANCE 2025 CITIZEN'S CHARTER

The Bureau of Local Government Finance (BLGF) Citizen's Charter for 2025 outlines the agency's commitment to delivering transparent, efficient, and citizen-centered services in compliance with Republic Act (R.A.) No. 9485 (Anti-Red Tape Act of 2007) and R.A. No. 11032 (Ease of Doing Business and Efficient Government Service Delivery Act of 2018).

This updated charter integrates a Quality Management System (QMS) to ensure continuous improvement in service delivery.

Key services provided by the BLGF include the issuance of Certificates of Net Debt Service Ceiling and Borrowing Capacity (CNDSCBC), which are essential for local government units (LGUs) seeking to secure loans from government financial institutions or private banks. The BLGF also offers technical assistance on real property valuation, ensuring that LGUs adhere to national standards and policies. Additionally, the agency supports the development and maintenance of the Real Property Information System (RPIS), facilitating efficient data management and compliance with real property valuation.

The 2025 Citizen's Charter emphasizes the BLGF's dedication to enhancing local fiscal management, promoting transparency, and fostering accountability among LGUs. Through these initiatives, the BLGF aims to empower LGUs to strengthen their financial capacities, thereby contributing to sustainable local development and improved public service delivery.

 [Click here for the full text of the BLGF 2025 Citizen's Charter](#)

GSE LAW
GERODIAS SUCHIANCO ESTRELLA

CONTACT US



www.GSElawfirm.com



Suite 2801 Discovery Center
25 ADB Avenue, Ortigas Center
Pasig City 1605 Philippines



Trunk (632) 8633-9757 to 58 /
8634-2935 / 8638-9345 to 46



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