

BDB Law

DU-BALADAD AND ASSOCIATES

ADVISORY

SERIES OF 2025

Amendments to
Documentary Stamp Tax
under **CMEPA**

BUREAU OF INTERNAL REVENUE
Revenue Regulations No. 19-2025
August 5, 2025

AMENDMENTS TO DOCUMENTARY STAMP TAX
UNDER THE CAPITAL MARKETS EFFICIENCY
PROMOTION ACT

I. New Rates of Documentary Stamp Taxes

DST	DST Rates	
	Pre-CMEPA	CMEPA
Original Issue of Shares of Stock	P2.00 / P200 of the par value	75% of 1% of the par value
Bonds, Debentures, and Certificates of Stock or Indebtedness Issued in Foreign Countries	Rates on similar instruments issued, sold, or transferred in the Philippines	75% of 1% of the value of the transaction
All Debt Instruments	P1.50 / P200 of the issue price	75% of 1% of the issue price

Notes:

- If the loan agreement, promissory note, mortgage, security interest over personal property, and other similar contracts are simultaneously issued and executed, only one DST shall be imposed depending on which will yield a higher tax.
- If only one instrument is prepared to cover the loan agreement, promissory note, mortgage, security interest over personal property, and other similar contracts, the DST on mortgages, pledges, and deeds of trust (Section 195) shall be imposed on the full amount of the loan or credit.

II. Documents and Papers Not Subject to Documentary Stamp Tax

- Exemption of transactions involving listed shares of stock now includes:
 - Redemptions or other dispositions; and
 - Shares of stock listed and traded through a foreign stock exchange.
- Additional exemptions:
 - Original issuance, redemption, or other disposition of shares in a mutual fund company; and
 - Issuance of certificate or other evidence of participation in a mutual fund or unit investment trust fund.

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Source:
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