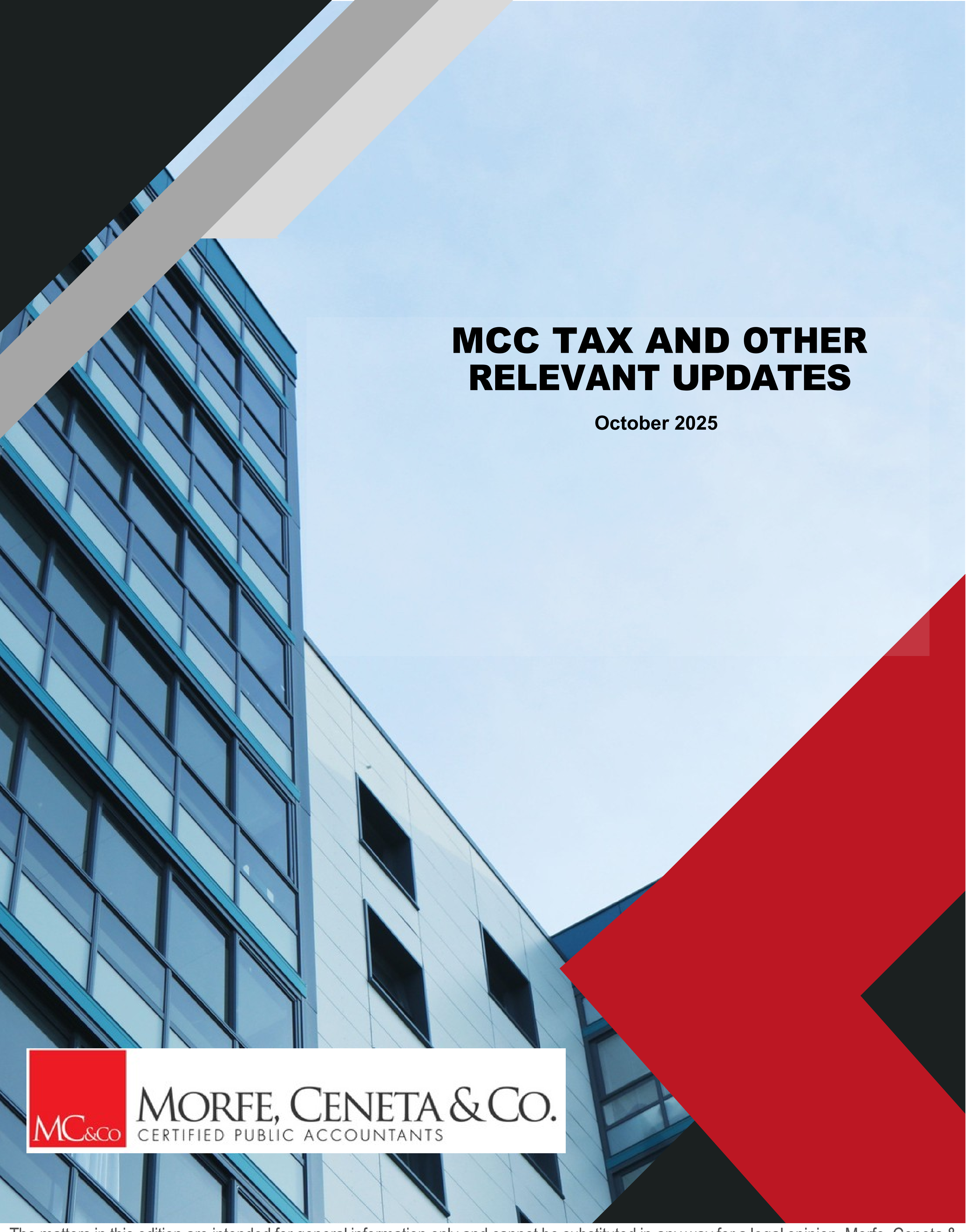

MCC TAX AND OTHER RELEVANT UPDATES

October 2025

MORFE, CENETA & CO.
CERTIFIED PUBLIC ACCOUNTANTS

IMPORTANT UPDATES:

ISSUANCE | DATE ISSUED	SUMMARY
RR 25-2025 | Oct. 3, 2025	**Suspends the bond posting requirement** under Section 160 of the Tax Code for **petroleum importers/manufacturers**, subject to compliance with registration, reporting, and ATRIG requirements, pending review by the Anti-Red Tape Authority.
RR 26-2025 | Oct. 16, 2025	**Extends the deadline for full e-invoicing implementation** for e-commerce, large taxpayers, and CAS users until **December 31, 2026**, with reporting obligations to begin once the BIR system is ready.
RMC 88-2025 | Oct. 2, 2025	**Extends filing and payment deadlines** in Cebu to **October 31, 2025**, due to the recent earthquake.
RMC 91-2025 | Oct. 8, 2025	Allows **Assistant Corporate Secretaries to sign Board Resolutions** and Secretary's Certificates for business registration.
RMC 92-2025 | Oct. 22, 2025	Provides a **temporary workaround for filing the 20% tax on foreign currency deposits** using BIR Form 0605 pending form update.
RMC 94-2025 | Oct. 27, 2025	Sets new guidelines for **refund/credit of excise taxes on unused internal revenue stamps** for cigarettes, heated tobacco, and vape products.
RMC 97-2025 | Oct. 30, 2025	Announces the availability of Revised BIR Forms 1900 to 1906
RMO 45-2025 | Oct. 20, 2025	**Updates Alphanumeric Tax Codes (ATCs)** in line with CMEPA implementation.
RMO 46-2025 | Oct.	Announces the creation of new alphanumeric tax codes on selected revenue sources under RR 24-2025
SEC Notice | Oct. 1, 2025	Announces the relocation of the Financial Analysis and Audit Division's (FAAD) receiving/releasing office to the **18th Floor of the SEC Headquarters, Makati City**.

DISCUSSION OF UPDATES

A. REVENUE REGULATIONS

REVENUE REGULATIONS 25-2025

The Bureau of Internal Revenue has issued Revenue Regulations 25-2025, suspending the requirement of posting a bond under Section 160 of the National Internal Revenue Code in light of certain concerns raised by the petroleum industry that the same is no longer necessary or relevant given that oil companies are required to pay the excise tax due on petroleum products prior to their release from customs territory or withdrawal from a refinery, and that the bond requirement runs inconsistent with the Ease of Doing Business Act.

With the foregoing, the Bureau of Internal Revenue has forwarded to the Anti-Red Tape Authority said provision for their review and consideration whether Section 160 of the National Internal Revenue Code has to be repealed. Pending this, the Bureau of Internal Revenue is suspending the posting of the bond subject to the following conditions:

a. The importer/manufacturer is duly registered with the Bureau of Internal Revenue (BIR) and the Bureau of Customs (BOC)
b. The importer/manufacturer has a record of substantial compliance with tax laws and customs regulations;
c. The importer must secure an Authority to Release Imported Goods (ATRIG) from the BIR by electronically filing an application via the Philippine National Single Window system prior to the release of imported petroleum products from customs territory custody or their withdrawal from local refineries; and
d. The importer shall submit to the BIR and BOC a monthly report of all importations covered under the Regulation, including quantities, invoice values, and corresponding tax payments.

To access the complete detail, you may follow this link: [RR No. 25-2025.pdf]

REVENUE REGULATIONS 26-2025

The Bureau of Internal Revenue has issued Revenue Regulations 26-2025 extending the deadline for complying with the issuance of the electronic invoices until December 31, 2026 for the following taxpayers:

- Taxpayers engaged in electronic commerce (e-commerce) or internet transactions, classified as Small, Medium and Large Taxpayers, (Micro Taxpayers are exempted);
- Taxpayers under the jurisdiction of the Large Taxpayers Service (LTS);
- Taxpayers classified as Large Taxpayers under RA No. 11976 (Ease of Paying Taxes Act) and RR No. 8-2024;
- Taxpayers using Computerized Accounting System (CAS), and Computerized Books of Accounts (CBA) with Accounting Records (with electronic invoicing) and other invoicing software.

Meanwhile, the following taxpayers shall be obligated to transmit electronic reports to the BIR on the following:

Conditions	What is the Taxpayer's Obligation	Taxpayers covered	When/ How to be communicated
Once a system capable of storing and processing the required data to be transmitted to the BIR is established	To issue electronic invoices	1. Taxpayers engaged in the export of goods and services pursuant to Sections 106 and 108 of the Tax Code, except those falling under Section 3(A)(4) of RR No. 11-2025; 2. Registered Business Enterprises availing of Tax Incentives under Section 304(D) of the Tax Code, as amended, except those falling under Section 3(A)(4) of RR No. 11-2025; 3. Taxpayers using POS System; and 4. Other taxpayers as may be required by the Commissioner.	Compliance will begin upon issuance of a separate revenue issuance
Once a system capable of storing and processing the required data to be transmitted to the BIR is established	Electronic Sales Reporting System	1. Taxpayers engaged in electronic commerce (e-commerce) or internet transactions, classified as Small, Medium and Large Taxpayers, (Micro Taxpayers are exempted); 2. Taxpayers under the jurisdiction of the Large Taxpayers Service (LTS); 3. Taxpayers classified as Large Taxpayers under RA No. 11976 (Ease of Paying Taxes Act) and RR No. 8-2024;	Compliance will begin upon issuance of a separate revenue issuance

		4. Taxpayers using CAS, and CBA with electronic invoicing and other invoicing software. 5. Taxpayers engaged in the export of goods and services pursuant to Sections 106 and 108 of the Tax Code; 6. Registered Business Enterprises availing of Tax Incentives under Section 304(D) of the Tax Code, as amended; 7. Taxpayers using POS System; and 8. Other taxpayers as may be required by the Commissioner.	

To know more about this issuance you may follow this link: RR No. 26-2025.pdf

B. REVENUE MEMORANDUM ORDERS

REVENUE MEMORANDUM CIRCULAR 088-2025

The Bureau of Internal Revenue has issued Revenue Memorandum Circular 088-2025 which extends the deadline of filing and payment of certain returns in relation to the recent Cebu Earthquake. It extends all the deadlines falling in October to October 31, 2025. The complete list is provided in the issuance itself.

The extension shall cover the following RDOs in Cebu:

1. RDO No. 80 – Mandaue City, Cebu
2. RDO No. 81 – Cebu City, North
3. RDO No. 82 – Cebu City South
4. RDO No. 83 – Talisay City, Cebu
5. RDO No. 123 – Large Taxpayers Division – Cebu

REVENUE MEMORANDUM CIRCULAR 91-2025

The Bureau of Internal Revenue has issued Revenue Memorandum Circular 91-2025 clarifying that the BIR will accept Board Resolution and Secretary's Certificate signed by the Assistant Secretary in relation to Documentary Requirements for Business Registration.

To know more about this issuance, follow this link: RMC NO. 91-2025.pdf

REVENUE MEMORANDUM CIRCULAR 92-2025

In connection with the increase of tax on Foreign Currency Deposit from 15% to 20% due to the implementation of CMEPA, the Bureau of Internal Revenue has issued Revenue Memorandum Circular 92-2025 which provides for a temporary workaround pending the release of the updated BIR Form 1602Q. This mandates in the transitory, taxpayers who use EFPS or EBIRForms to use BIR Form 0605 and fill in the necessary information as follows:

A. ATC Code – MC200
B. Tax Type – WB
C. Manner of Payment – "OTHERS" and type in "FWT CMEPA"

The tax due can be paid online for EBIRForms users or proceeding to pay for EFPS users.

Refer to this link for more details: [RMC No. 92-2025.pdf]

REVENUE MEMORANDUM CIRCULAR NO. 94-2025

The Bureau of Internal Revenue has issued Revenue Memorandum Circular 94-2025 imposing additional guidelines and policies on the processing of refund/credit of excise tax associated with unused internal revenue stamps for cigarettes, heated tobacco products and vape products.

The claim for refund or credit shall follow the checklist of mandatory requirements annexed in this RMC which claim must be filed within two (2) years from the payment of excise tax.

It likewise prescribes the internal procedure that shall govern the processing of the excise tax refund.

To know more about this issuance, you -may refer to this link: [RMC NO. 94-2025.pdf]

REVENUE MEMORANDUM CIRCULAR 97-2025

The Bureau of Internal Revenue (BIR) has announced the availability of revised BIR Registration Forms (October 2025 ENCS), attached as Annexes "A" to "G". These updates are part of the BIR's initiative to streamline registration processes and align with the Ease of Doing Business and Efficient Government Service Delivery Act of 2018 (RA 11032).

Revised BIR Registration Forms

Form No.	Description
1900 (Annex "A")	Application for Permit to Use Loose-Leaf Books of Accounts/Invoices and Other Accounting Records
1901 (Annex "B")	Application for Registration for Self-Employed (Single Proprietor/Professional), Mixed Income Individuals, Non-Resident Alien Engaged in Trade/Business, Estate and Trust
1902 (Annex "C")	Application for Registration for Individuals Earning Purely Compensation Income (Local and Alien Employee)

Form No.	Description
1903 (Annex "D")	Application for Registration for Corporations, Partnerships (Taxable/Non-Taxable), Including Government Agencies and Instrumentalities (GAIs), Local Government Units (LGUs), Cooperatives and Associations
1904 (Annex "E")	Application for Registration for One-time Taxpayer and Person Registering under E.O. 98 (Securing a TIN to be able to transact with any government office)
1905 (Annex "F")	Application for Registration Information Update/Correction/Cancellation
1906 (Annex "G")	Application for Authority to Print Invoices

For more information, you may check this link: **RMC No. 97-2025.pdf**

C. REVENUE MEMORANDUM ORDERS

REVENUE MEMORANDUM ORDER 045-2025

The Bureau of Internal Revenue has issued Revenue Memorandum Order 045-2025 which provides for the following changes in Alphanumeric Tax Code (ATC) in line with the implementation of CMEPA.

EXISTING (per ATC Handbook)			BIR FORM NO.	LEGAL BASIS	MODIFIED/ NEW
ATC	Description	Tax Rate			Tax Rate
WI170 WC170	Interest on foreign currency deposit Resident Individual Resident Corporate	15%	1602Q/ 2306	R.A. No. 12214/ RR No. 21-2025	20%

Refer to this link for more details: RMO No. 45-2025.pdf

REVENUE MEMORANDUM ORDER 46-2025

The Bureau of Internal Revenue (BIR) has issued a Revenue Memorandum Order (RMO) creating new Alphanumeric Tax Codes (ATCs) to ensure proper identification and monitoring of payments subject to 1/2% creditable withholding tax under Revenue Regulations (RR) No. 24-2025. These apply to income payments made by top withholding agents to manufacturers and direct importers of specific products.

Newly Created ATCs

ATC	Description	Tax Rate	Legal Basis	BIR Form No.
WI840 / WC840	Income payments to manufacturers and direct importers of motor vehicles (CBUs/SKD units), motor vehicle parts, and accessories	1/2%	RR No. 24-2025	1601-EQ / 2307
WI850 / WC850	Income payments to manufacturers and direct importers of medicine and pharmaceutical products	1/2%	RR No. 24-2025	1601-EQ / 2307
WI860 / WC860	Income payments to manufacturers and direct importers of solid or liquid fuels and related products	1/2%	RR No. 24-2025	1601-EQ / 2307

You may refer to this link for full details: RMO NO. 46-2025.pdf

D. SEC NOTICE

SEC NOTICE OCTOBER 1, 2025

In its Notice dated 29 September 2025, the Securities and Exchange Commission announces the transfer of location for receiving hard copies and releasing signed certificates for applications filed before the Financial Analysis and Audit Division (FAAD). Below summarizes said change, to wit:

Old Receiving / Releasing Office	New Receiving / Releasing Office
4th Floor, SEC Headquarters, 7907 Makati Avenue, Salcedo Village, Bel-Air, Makati City, Philippines	FAAD Office, 18th Floor, SEC Headquarters, 7907 Makati Avenue, Salcedo Village, Bel-Air, Makati City, Philippines

Transacting public may still avail of the in-house courier service of the SEC.

For more information, you may access the complete file in this link: TRANSFER OF LOCATION FOR RECEIVING OF HARD COPIES AND RELEASING OF SIGNED CERTIFICATES FOR FAAD APPLICATIONS - Securities and Exchange Commission