

REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

SPECIAL THIRD DIVISION

307 ORGANISATIONAL
SUPPORT AND SOLUTIONS
PHILIPPINES, INC.
(Formerly:
ORGANISATIONAL
SUPPORT SERVICES, INC.),
Petitioner,

CTA Case No. 10929

Members:
REYES-FAJARDO, Chairperson and
ANGELES, II.

Promulgated:

- versus -

COMMISSIONER OF
INTERNAL REVENUE,
Respondent.

OCT 02 2026

1:08 p.m.

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RESOLUTION

REYES-FAJARDO, J.:

By Decision dated January 20, 2026,¹ the Court denied petitioner's claim for refund of ₱618,441.08, representing its alleged unutilized input value-added tax (VAT) attributable to its purported zero-rated sales of services for calendar year (CY) 2020 because it did not prove that its sales qualified for zero-rating under Section 108(B)(2) of the 1997 National Internal Revenue Code (NIRC), as amended.

Unconvinced, petitioner filed its Motion for Reconsideration ("Motion")² on February 11, 2026, maintaining that its sales of services to Therapeutic Case Management Services Limited (TCMS)

¹ Docket - Volume II, pp. 725-740.

² *Id.* at pp. 742-764.

satisfied the requirements under Section 108(B)(2) on the NIRC, as amended, and qualified as zero-rated sales.

The Motion lacks merit.

One of the conditions enjoined by jurisprudence³ to accord 0% VAT on sales of services falling under Section 108(B)(2)⁴ of the NIRC, as amended, is that the entity to whom the refund claimant rendered its services is a foreign corporation doing business *outside* the Philippines. Petitioner failed to meet this requirement.

A second look at the Service Agreement⁵ between petitioner and its client, TCMS and as exhaustively discussed on pages 12 to 14 of the assailed Decision,⁶ reveals that petitioner is the agent of TCMS. Being so, the services performed by petitioner in the Philippines mean that TCMS is doing business in the Philippines. For this reason, no error was committed in denying petitioner's input VAT refund claim for failure to establish that its sales qualified as valid zero-rated sales under Section 108(B)(2) of the NIRC, as amended.

ACCORDINGLY, petitioner's Motion for Reconsideration is **DENIED** for lack of merit. The Decision dated January 20, 2026 is **AFFIRMED**.

Finally, petitioner's Manifestation informing the Court of the change of its corporate name from ORGANISATIONAL SUPPORT SERVICES, INC. to 307 ORGANISATIONAL SUPPORT AND SOLUTIONS PHILIPPINES, INC. as evidenced by the Securities and Exchange Commission Certificate of Filing of Amended Articles of

³ See *Commissioner of Internal Revenue v. Deutsche Knowledge Service Pte. Ltd.*, G.R. No. 234445, July 15, 2020; *Sitel Philippines Corporation (formerly Clientlogic Phils., Inc.) v. Commissioner of Internal Revenue*, G.R. No. 201326, February 8, 2017; and *Accenture, Inc. v. Commissioner of Internal Revenue*, G.R. No. 190102, July 11, 2012.

⁴ **(B) Transactions Subject to Zero Percent (0%) Rate** - The following services performed in the Philippines by VAT-registered persons shall be subject to zero percent (0%) rate:

...
(2) Services other than those mentioned in the preceding paragraph, rendered to a person engaged in business conducted outside the Philippines or to a nonresident person not engaged in business who is outside the Philippines when the services are performed, the consideration for which is paid for in acceptable foreign currency and accounted for in accordance with the rules and regulations of the Bangko Sentral ng Pilipinas (BSP);

⁵ Exhibit "P-5," Docket — Vol. II, pp. 551 to 553; Docket — Vol. I, p. 66 (for page 2 of the Service Agreement).

⁶ Docket — Vol. II, pp. 736 to 738.



Incorporation is **NOTED**. The records of the case shall henceforth reflect petitioner's new corporate name.

SO ORDERED.


MARIAN IVY F. REYES-FAJARDO
Associate Justice

I CONCUR:


HENRY S. ANGELES
Associate Justice