

Republic of the Philippines  
HOUSE OF REPRESENTATIVES  
Quezon City, Metro Manila

TWENTIETH CONGRESS  
*Second Regular Session*

House Bill No. **11379**



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INTRODUCED BY REPRESENTATIVES RALPH WENDEL P. TULFO  
AND JOCELYN P. TULFO

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**AN ACT**

**DECLARING A ONE-TIME AMNESTY ON ALL UNPAID INTERNAL REVENUE  
TAXES IMPOSED BY THE NATIONAL GOVERNMENT FOR TAXABLE YEAR  
2024 AND PRIOR YEARS**

**EXPLANATORY NOTE**

Article VI, Section 28 of the 1987 Constitution provides that the rule of taxation shall be uniform and equitable and that Congress shall evolve a progressive system of taxation. By this authority, Congress may adopt measures that improve tax administration, enhance revenue collection, and encourage voluntary compliance among taxpayers.

This proposed measure strengthens safeguards against tax evasion by authorizing limited access to bank information for validation purposes and by imposing strict penalties for false declarations. It, likewise, upholds confidentiality protections under Republic Act No. 10173, otherwise known as the "Data Privacy Act of 2012," and prescribes clear rules on the use and disclosure of taxpayer data.

Furthermore, the bill provides taxpayers with a one-time opportunity to settle their unpaid internal revenue tax liabilities under more reasonable terms. By reducing penalties and surcharges, the measure seeks to encourage voluntary compliance with

tax laws, enable the government to recover revenues that might otherwise remain uncollected, and provide financial relief to individuals and businesses burdened by accumulated tax obligations.

Through this initiative, the State aims to promote fairness in the tax system, strengthen tax administration, and support the country's fiscal stability and economic recovery.

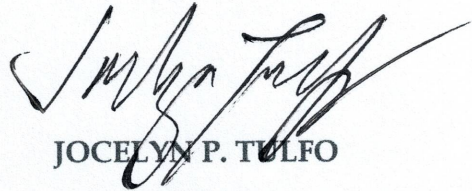
In view of the foregoing, the urgent passing of this bill is earnestly sought.



**RALPH WENDEL P. TULFO**

*Representative*

*2<sup>nd</sup> District of Quezon City*



**JOCELYN P. TULFO**

*Representative*

*ACT-CIS Partylist*

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*Be it enacted by the Senate and House of Representatives of the Philippines in Congress  
assembled:*

1       **SECTION 1. *Short Title.*** – This Acts shall be known as the “General Tax  
2       Amnesty Act of 2026.”

3  
4       **SEC. 2. *Declaration of Policy.*** – It is hereby declared the policy of the State to  
5       protect and enhance revenue administration and collection, and make the country’s  
6       tax system more equitable, by simplifying the tax compliance requirements. Towards  
7       this end, the State shall:

- 8  
9               a. Broaden the tax base by offering a one-time general tax amnesty of all  
10              internal revenue tax obligations that will help cleanse, organize, and  
11              improve the Bureau of Internal Revenue database; and  
12              b. Provide a more equitable tax system by adopting a comprehensive tax  
13              reform program that will simplify the requirements on tax amnesties

1 with the use of simplified forms, and utilization of information  
2 technology in broadening the tax base.

3  
4 **SEC.3. Definition of Terms.** – As used in this Act:

5  
6 a. *Statement of Assets, Liabilities, and Net Worth* refers to a declaration of  
7 the assets, liabilities, and net worth as of December 31, 2024, as  
8 follows:

- 9 1. Assets within or without the Philippines, whether real or  
10 personal, tangible or intangible, whether or not used in trade or  
11 business: *Provided*, That property other than money shall be  
12 valued at the cost at which the property was acquired: *Provided*,  
13 *further*, That foreign currency assets and/or securities shall be  
14 valued at the rate of exchange prevailing as of the date of the  
15 Statement of Assets, Liabilities, and Net Worth;  
16 2. All existing liabilities which are legitimate and enforceable,  
17 secured or unsecured, whether or not incurred in trade or  
18 business; and  
19 3. The net worth of the taxpayer, which shall be the difference  
20 between the total assets and total liabilities; and

21 b. *Total Asset* refers to the amount of the aggregate assets whether within  
22 or without the Philippines, real or personal, tangible or intangible, or  
23 ordinary or capital.

24  
25 **SEC. 4. Coverage.** – There is hereby authorized and granted a tax amnesty,  
26 hereinafter called General Tax Amnesty, which shall cover all national internal  
27 revenue taxes such as, but not limited to, income tax, withholding tax, capital gains  
28 tax, donor's tax, value-added tax, other percentage taxes, excise tax, and  
29 documentary stamp tax collected by the Bureau of Internal Revenue, including value-  
30 added tax and excise taxes collected by the Bureau of Customs for taxable year 2024  
31 and prior years, with or without assessments duly issued therefor, that have

1 remained unpaid: *Provided, however,* That the General Tax Amnesty hereby  
2 authorized and granted shall not cover estate tax and persons or cases enumerated  
3 under Section 10 hereof.

4  
5 **SEC. 5. *Entitlement Under the General Tax Amnesty.*** – Any person, whether  
6 natural or juridical, who is covered by this law, may enjoy the immunities and  
7 privileges of the General Tax Amnesty by paying, at the taxpayer's option, an  
8 amnesty tax at:

- 9
- 10 i. the rate of two percent (2%) based on the taxpayer's total assets as  
11 of December 31, 2024 as declared in the Statement of Total Assets;  
12 or  
13 ii. based on the taxpayer's total net worth as of December 31, 2024, as  
14 declared in the Statement of Assets, Liabilities, and Net Worth filed  
15 pursuant to Section 6 hereof and in accordance with the following  
16 schedule of amnesty tax rates and minimum amnesty tax payments  
17 required:
- 18 a. Individual (whether resident or nonresident citizens,  
19 including resident or nonresident aliens), Trusts and  
20 Estates..... 5% or ₱100,000 whichever is higher;
- 21 b. Corporations
- 22 1. With subscribed capital of above ₱50 million.....  
23 5% or ₱1,300,000, whichever is higher;
- 24 2. With subscribed capital of above ₱20 million up to  
25 ₱50 million.....5% or ₱650,000, whichever is  
26 higher;
- 27 3. With subscribed capital of ₱5 million up to ₱20  
28 million.....5% or ₱350,000, whichever is higher; or

4. With subscribed capital of below ₱5 million.....5% or ₱150,000, whichever is higher; and

c. Other juridical entities, including but not limited to, cooperatives and foundations, that have become taxable as of December 31, 2024.....5% or ₱100,000, whichever is higher.

*Provided, That if the taxpayer opts to pay the amnesty tax based in total net worth and the computed net worth is negative, the taxpayer may still avail benefits of tax amnesty, and pay the minimum amnesty tax.*

**SEC. 6. *Availment of the General Tax Amnesty; When and Where to File and Pay.*** – Any person, natural or juridical, who wishes to avail of the General Tax Amnesty shall, within one (1) year from the effectivity of the Implementing Rules and Regulations, file either electronically or manually, with any authorized agent bank, Revenue District Office through Revenue Collection Officer, or authorized tax software provider, a sworn General Tax Amnesty Return accompanied by a notarized Statement of Total Assets or notarized Statement of Assets, Liabilities, and Net Worth, as the case maybe, in such forms as may be prescribed in the Implementing Rules and Regulations, as of December 31, 2024. The payment of the amnesty tax shall be made, either electronically or manually, at the time the return is filed with any authorized agent bank, Revenue District Office through Revenue Collection Officer, or authorized tax software provider: *Provided, That* the Revenue District Officer shall issue and endorse an Acceptance Payment Form, in such form as may be prescribed in the Implementing Rules and Regulations of this Act authorizing the authorized agent bank, the Revenue District Office through the Revenue Collection Officer or authorized software provider, to accept the amnesty tax payment.

1       The availment of the General Tax Amnesty and the issuance of the  
2       corresponding Acceptance Payment Form do not imply any admission of criminal,  
3       civil, or administrative liability on the part of the availing taxpayer.

4  
5       If the tax amnesty is availed based on the period indicated hereunder, the  
6       taxpayer shall be entitled to the corresponding reduction in the total amnesty tax due:

- 7
- 8           a. If paid on or before the end of the third calendar month from the  
9           effectivity of the Implementing Rules and Regulations.....20%;
  - 10          b. If paid after the end of the third calendar month until the end of the  
11          sixth calendar month from the effectivity of the Implementing  
12          Rules and Regulations.....15%; and
  - 13          c. If paid after the end of the sixth calendar month until the end of the  
14          ninth calendar month from the effectivity of the Implementing  
15          Rules and Regulations.....10%.
- 16

17       *Provided, finally,* That, notwithstanding any contrary provision of Republic Act  
18       No. 1405, otherwise known as the "Bank Secrecy Law", Republic Act No. 6426,  
19       otherwise known as the "Foreign Currency Deposit Act of the Philippines", and other  
20       general or special laws, and for purposes of validation relative to availment of the  
21       General Tax Amnesty, the filing of a sworn General Tax Amnesty Return authorizes  
22       the Commissioner of Internal Revenue for the duration of the one (1) year period of  
23       availment of the General Tax Amnesty to inquire into and receive information on the  
24       taxpayer's bank deposits and other related data held by local and foreign financial  
25       institutions, and exchange information with a foreign tax authority pursuant to an  
26       international convention, agreement, or treaty to which the Philippines is a signatory  
27       or party thereof, duly ratified and concurred in by the Senate of the Philippines.

1           SEC. 7. *Contents of the Statement of Total Assets and Statement of Assets,*  
2   *Liabilities, and Net Worth. –*

3  
4           A. The Statement of Total Assets shall contain a declaration of the total  
5           assets as of December 31,2024, as follows:

6           1. Assets within or without the Philippines, whether real or  
7           personal, tangible or intangible, whether or not used in trade  
8           business:

9           a. Real properties shall be accompanied by a description  
10           of their classification, exact location, and valued at the  
11           actual acquisition cost, zonal value, or the Schedule of  
12           Market Values at the time of acquisition, whichever is  
13           higher, if acquired by purchase; *Provided,* That if the  
14           real properties are acquired through inheritance or  
15           donation, it shall be valued at the actual price as stated  
16           in the real property transaction documents, zonal  
17           value, or the Schedule of Market Values, whichever is  
18           higher;

19           b. Personal properties other than money, shall be  
20           accompanied by a specific description of the kind and  
21           number of assets ( *e.g.* automobiles, shares of stock,  
22           etc.) or other investments, indicating the acquisition  
23           cost less the accumulated depreciation or  
24           amortization, or the corresponding book value for  
25           shares of stocks, in proper cases, if acquired by  
26           purchase, or the fair market price or value at the date  
27           of the Statement of Total Assets, if acquired through  
28           inheritance or donation;

29           c. Assets denominated in foreign currency shall be  
30           converted into the corresponding Philippine currency

1 equivalent, at the rate of exchange prevailing as of the  
2 date of the Statement of Total Assets; and

- 3 d. Cash on hand and in bank in peso as of the date of the  
4 Statement of Total Assets, as well as cash on hand and  
5 in bank in foreign currency, converted to Philippine  
6 peso at the rate of exchange prevailing as of the date  
7 of the Statement of Total Assets;

8 B. The statement of Assets, Liabilities, and Net Worth shall contain a  
9 true and complete declaration of assets, liabilities, and net worth of  
10 the taxpayer as of December 31, 2024, as follows:

- 11 1. Assets within or without the Philippines, whether real or  
12 personal, tangible or intangible, whether or not used in trade  
13 or business:

14 a. Real properties shall be accompanied by a  
15 description of their classification, exact location, and  
16 valued at the actual acquisition cost, zonal value, or  
17 the Schedule of Market Values at the time of  
18 acquisition, whichever is higher, if acquired through  
19 inheritance or donation, it shall be valued at the  
20 actual price as stated in the real property transaction  
21 documents, zonal value, or the schedule of Market  
22 Values, whichever is higher;

23 b. Personal properties other than money, shall be  
24 accompanied by a specific description of the kind  
25 and number of assets (e.g. automobiles, shares of  
26 stock, etc.) or other investments, indicating the  
27 acquisition cost less the accumulated depreciation or  
28 amortization, or the corresponding book value for  
29 shares of stock, in proper cases, if acquired through  
30 inheritance or donation;

- 1 c. Assets denominated in foreign currency shall be  
2 converted into the corresponding Philippine  
3 currency equivalent, at the rate of exchange  
4 prevailing as of the date of the Statement of Assets,  
5 Liabilities, and Net Worth; and  
6 d. Cash on hand and in bank in peso as of the date of  
7 the Statement of Assets, Liabilities, and Net worth,  
8 as well as cash on hand and in bank in foreign  
9 currency, converted to Philippine peso at the rate of  
10 exchange prevailing as of the date of the Statement  
11 of Assets, Liabilities, and Net Worth;  
12 2. All existing liabilities, which are legitimate and enforceable,  
13 secured or unsecured, whether or not incurred in trade or  
14 business, disclosing or indicating clearly the name and  
15 address of the creditor and the amount of the corresponding  
16 liability. Foreign currency denominated liabilities are  
17 converted to Philippine peso at the rate of exchange  
18 prevailing as of the date of the Statement of Assets,  
19 Liabilities, and Net Worth; and  
20 3. The total net worth of the taxpayer, which shall be difference  
21 between the total assets and total liabilities.  
22

23 **SEC. 8. *Presumption of Correctness of the Statement of Total Assets, and***  
24 ***Statement of Assets, Liabilities, and Net Worth.*** – The Statement of Total Assets or  
25 the Statement of Assets, Liabilities, and Net Worth, filed at the option of the taxpayer  
26 shall be considered true and correct, except where the amount of total assets or net  
27 worth as declared in the Tax Amnesty Return, Statement of Total Assets, or Statement  
28 of Assets, Liabilities, and Net Worth is understood to the extent of thirty percent  
29 (30%) or more as may be established by the Commissioner of Internal Revenue:

1 *Provided*, That the Commissioner of Internal Revenue shall make such determination  
2 within a period of one (1) year from the availment of General Tax Amnesty.

3  
4 The Acceptance Payment Form and the General Tax Amnesty Return shall be  
5 submitted to the Revenue District Office after complete payment. The completion of  
6 these requirements shall be deemed full compliance with the provisions of this Act.  
7 A Certificate of Availment of the General Tax Amnesty shall be issued by the Bureau  
8 of Internal Revenue within fifteen (15) calendar days from submission to the Bureau  
9 of Internal Revenue of the Acceptance Payment Form and the General Tax Amnesty  
10 Return. Otherwise, the duplicate copies, stamped as received, of the Acceptance  
11 Payment Form, and the General Tax Amnesty Return shall be deemed as sufficient  
12 proof of availment.

13  
14 **SEC. 9. Immunities and Privileges.** – Those who avail of the General Tax  
15 Amnesty and have fully complied with all the conditions set forth in this Act and  
16 upon payment of the amnesty tax shall be entitled to the following immunities and  
17 privileges:

- 18  
19 a. With respect to the years covered by the tax amnesty, the taxpayer  
20 shall be immune from the payment of taxes, as well as additions  
21 thereto, and from all appurtenant civil, criminal, and administrative  
22 cases and penalties under the National Internal Revenue Code of  
23 1997, as amended, arising from the failure to pay any and all internal  
24 revenue taxes for taxable year 2024 and prior years and from such  
25 other investigations or suits insofar as they relate to the assets,  
26 liabilities, net worth, and internal revenue taxes that are subject of  
27 the tax amnesty;
- 28 b. Any information or data contained in, derived from, or provided by  
29 a taxpayer in the Tax Amnesty Return, Statement of Total Assets, or  
30 Statement of Assets, Liabilities, and Net Worth, as the case may be,

1 and appurtenant documents shall be confidential in nature and shall  
2 not be used in any investigation or prosecution before any judicial,  
3 quasi-judicial, and administrative bodies. However, the taxpayer  
4 may use this as defense, whenever appropriate, in cases brought  
5 against the taxpayer; and

- 6 c. The books of accounts and other records of the taxpayer for the years  
7 covered by the tax amnesty availed of shall not be examined by the  
8 Bureau of Internal Revenue: *Provided*, That the Commissioner of  
9 Internal Revenue may authorize in writing the examination of the  
10 said books of accounts and other records to verify the validity or  
11 correctness of a claim or any tax refund, tax credit (other than refund  
12 or credit taxes withheld on wages), tax incentives, and/or  
13 exemptions under existing laws.  
14

15 All these immunities and privileges shall not apply when the taxpayer failed  
16 to file a General Tax Amnesty Return and a statement of Total Assets, or Statement  
17 of Assets, Liabilities, and Net Worth, as the case may be, or where the amount of total  
18 assets or net worth as of December 31, 2024 is proven to be understated to the extent  
19 of thirty percent (30%) or more, in accordance with the provisions of Section 8 hereof,  
20 or in cases of fraud, regardless of the extent of the under-declaration of total assets or  
21 net worth.  
22

23 Upon full compliance with all the conditions set forth in this Title and payment  
24 of the corresponding general amnesty tax, the tax amnesty granted under this Title  
25 shall become final and irrevocable.  
26  
27  
28  
29

1           **SEC. 10. *Exceptions.*** – The General Tax Amnesty under this Act shall not  
2 extend to the following:

- 3
- 4           a.   Withholding tax agents who withheld taxes but failed to remit the  
5               same to the Bureau of Internal Revenue;
- 6           b.   Taxpayers with cases pending in appropriate courts at the time of  
7               application of the General Tax Amnesty involving:
- 8               1.   Those that fall under the jurisdiction of the Presidential  
9                   Commission on Good Government;
- 10              2.   Unexplained or unlawfully acquired wealth under Republic  
11                 Act No. 3019, otherwise known as the “Anti-Graft and  
12                 Corrupt Practices Act”, and Republic Act No. 7080 or “An  
13                 Act Defining and Penalizing the Crime of Plunder”;
- 14              3.   Violations of Republic Act No. 9160, otherwise known as the  
15                 “Anti-Money Laundering Act”, as amended;
- 16              4.   Tax evasion and other criminal offenses under Chapter II of  
17                 Title X of the National Internal Revenue Code of 1997, as  
18                 amended; and
- 19              5.   Felonies of frauds, illegal exactions and transactions, and  
20                 malversation of public funds and property under Chapters  
21                 III and IV of Title VII of the Revised Penal Code;
- 22           c.   Tax cases that become final and executory; and
- 23           d.   Delinquencies and assessments that have become final and  
24               executory.
- 25

26           **SEC. 11. *Declaration under Penalties of Perjury.*** – Any declaration, return,  
27 and other statement required under this Ac shall contain a written statement that  
28 they are made under the penalties of perjury. Any person who willfully files a  
29 declaration, return, or statement containing information which is not true and correct

1 as to every material matter shall, upon conviction, be subject to the penalties  
2 prescribed for perjury under the Revised Penal Code.

3  
4 In case a false a fraudulent return is willfully made, the penalty to be imposed  
5 shall be fifty percent (50%) of the tax or of the deficiency tax, in case, any payment  
6 has been made on the basis of such return before the discovery of the falsity or fraud:  
7 *Provided, That failure to report total assets or net worth in an amount exceeding thirty*  
8 *percent (30%) as determined by the Commissioner of Internal Revenue pursuant to*  
9 *the rules and regulations to be promulgated by the Secretary of Finance, shall*  
10 *constitute prima facie evidence of a false or fraudulent return.*

11  
12 *Provided, further, That if the offender is a juridical entity, the penalties shall be*  
13 *imposed on the entity's responsible officers, such as, but not limited to, the president,*  
14 *chief executive officer, general manager, or partner directly responsible, or members*  
15 *of the board of directors, others who have beneficial interest in the juridical entity,*  
16 *and employees responsible for the violation.*

17  
18 **SEC. 12. Confidentiality and Non-use of information and Data in the**  
19 ***Statement of Total Assets and Statement of Assets, Liabilities, and Net Worth. –***  
20 **Any information or data contained in, derived from or provided by a taxpayer in the**  
21 **Tax Amnesty Return, Statement of Total Assets, or Statement of Assets, Liabilities,**  
22 **and Net worth, as the case may be and appurtenant documents shall be confidential**  
23 **in nature and shall not be used in any investigation or prosecution before any judicial**  
24 **, quasi-judicial, and administrative bodies.**

25  
26 Any statements of assets, liabilities, and net worth, financial statements,  
27 information sheets, and any such other statements or disclosures that may have been  
28 previously submitted by the taxpayer as required by existing laws are deemed to  
29 have been amended by the Tax Amnesty Return and/or the Statement of Total  
30 Assets or Statement of Assets, Liabilities, and Net worth, as the case may be, filled

1 under this Act and may not be the subject of any investigation or prosecution or be  
2 used in and investigation or prosecution before any judicial, quasi-judicial, and  
3 administrative bodies.

4  
5 **SEC. 13. *Information Management System.*** – For purposes of enhancing  
6 revenue administration, revenue collection and policy formulation, the Department  
7 of Finance, in coordination with the Bureau of Internal Revenue, Land Registration  
8 Authority, Department of Trade and Industry, Securities and Exchange Commission,  
9 Land Transportation Office, and other agencies concerned, shall institute and  
10 Information Management Program for the effective use of information declared or  
11 obtained from the Tax Amnesty Returns and Statement of Total Assets or Statement  
12 of Assets, Liabilities, and Net Worth, as the case may be, required to be filed under  
13 this Act.

14  
15 All the statements and returns required under this Act shall be filed processed  
16 separately from all other records of the Bureau of Internal Revenue in accordance  
17 with the Implementing Rules and Regulations of this Act.

18  
19 If the data requirements consist of information found in the income tax return  
20 of taxpayers, the requirements under Section 71 of the National Internal Revenue  
21 Code of 1997, as amended, shall still be complied with. The Information Management  
22 System shall also comply with the provisions of Republic Act No. 10173, otherwise  
23 known as the “Data Privacy Act”, and such other laws relating to confidentiality of  
24 information.

25  
26 **SEC. 14. *Unlawful Divulgence of Tax Amnesty Return and Appurtenant***  
27 ***Document.*** – It shall be unlawful for any person having knowledge of the Tax  
28 Amnesty Return and appurtenant documents, to disclose any information relative  
29 thereto, and any violation hereof shall be penalized a fine of One hundred fifty  
30 thousand pesos (P150,000) and imprisonment of not less than six (6) years but not

1 more than ten (10) years: *Provided*, That if the offender is an officer or employee of the  
2 Bureau of Internal Revenue or any government entity, the penalties under Section  
3 270 of the National Internal Revenue Code of 1997, as amended, shall apply: *Provided*,  
4 *further*, That the offender shall likewise suffer an additional penalty of perpetual  
5 disqualification to hold public office.

6  
7 **SEC. 15. *Report to Oversight Committee.*** - The Commissioner shall submit to  
8 the Oversight Committee referred to in Section 290 of the National Internal Revenue  
9 Code of 1997, as amended, through the Chairpersons of the Committee on Ways and  
10 Means of the Senate of the Philippines and the House of Representatives, a detailed  
11 report on the implementation of this Act within six (6) months after the one (1)-year  
12 period of availment of the General Tax Amnesty.

13  
14 **SEC. 16. *Implementing Rules and Regulations.*** - The Secretary of Finance shall,  
15 in coordination with the Commissioner of Internal Revenue, promulgate and publish  
16 the necessary rules and regulations of this Act within ninety (90) days from its  
17 effectivity.

18  
19 The failure of the Secretary of Finance to promulgate the said rules and  
20 regulations shall not prevent the implementation of this Act upon its effectivity.

21  
22 **SEC. 17. *Separability Clause.*** - If any provision of this Act is subsequently  
23 declared invalid or unconstitutional, the other provisions hereof which are not  
24 affected thereby shall remain in full force and effect.

25  
26 **SEC. 18. *Repealing Clause.*** - All other laws, acts, presidential decrees, rules  
27 and regulations, or parts thereof inconsistent with the provisions of this Act are  
28 hereby expressly repealed, amended, or modified accordingly.

1           **SEC. 19. Effectivity.** – This Act shall take effect after fifteen (15) days following  
2 its complete publication in the *Official Gazette* or in a newspaper of general  
3 circulation.

4

5           *Approved,*