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Personal Income Tax



GUIDANCE RULING

Personal Income Tax (“PIT”) on securities transfer in overseas

When an individual is a Vietnam tax resident and generates income from securities transfer in overseas, the individual must declare and pay PIT at the tax rate of 0.1% on the sales proceeds and submit the tax declaration dossier to the Tax Department where the individual registered permanent residence or temporary residence.

(Official Letter No. 33173/CTHN-TTHT dated 30 August 2021 issued by Hanoi City Tax Department)

PIT on the allowance paid to the employee, which is sourced from the reduction in employer’s contribution rate to Occupational Accidents and Diseases

When the Company:

- Qualifies to the reduction in contribution to the fund of Occupational Accidents and Diseases at 0% (reduce from 0,5% to 0%) for a 12-month period (from 01 July 2021 to 30 June 2022), and
- Paid the allowance generated from the reduction to the employees according to the guidance in Clause 1, Section II of the Resolution No. 68/NQ-CP dated 01 July 2021 issued by the Government

Such allowance shall not be included in the taxable income of the employees if there are legitimate supporting documents/invoices in place.

(Official Letter No. 2646/CT-TTHT dated 10 September 2021 issued by Long An Province Tax Department, and Official Letter No. 4102/TCT-DNNCN dated 25 October 2021 issued by General Department of Taxation)

PIT on expenses paid for employees due to Covid-19

With respect to Covid-19 related expenses including:

- Quarantine expenses in Vietnam and foreign countries for overseas business trips (meal, accommodation, Covid-19 testing, picking up when enter Vietnam or from the place where the individuals are required to travel to the quarantine places, other costs of living during the quarantine medical period, etc.) to follow requirements of relevant authorities,
- Expenses for Covid-19 testing or buying testing kits for employees, buying protective facilities for employees Covid-19 prevention at work, and meal, accommodation expenses when employees are required to stay at the workplace according to “3 on-site” working plan;

Those expenses related to Covid-19 pandemic would be treated as deductible for CIT and non- taxable for PIT if can be proven actually incurred with legitimate supporting documents/ invoices

(Official Letter No. 4110/TCT-DNNCN dated 27 October 2021 issued by General Department of Taxation)



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Tax Administration



GUIDANCE RULING

Decision No. 1832/QĐ-BTC on the implementation of electronic invoices in Ho Chi Minh City

The Ministry of Finance issued the Decision No. 1832/QĐ-BTC on 20 September 2021, effective from 20 September 2021 providing detailed guidance on the implementation of electronic invoices in Ho Chi Minh City as below:

- From 01 November 2021, **e-invoices would be applied for all enterprises, economic organizations, business households, business individuals operating in Ho Chi Minh City** in compliance with Tax Administrative Law, Decree No. 123/2020/NĐ-CP and Circular No. 78/2021/TT-BTC prescribing guidance on invoices (**except for unqualified cases as regulated**).
- Ho Chi Minh City Tax Department (“HCMCTD”) shall **notify each eligible enterprise, economic organizations, business households and business individuals and conduct necessary trainings** on e-invoices regulations for taxpayers for their information and proper preparation.
- A hot line of HCMCTD and tax departments of districts in HCMC would be officially announced to address questions arising during the implementation.

(Decision No. 1832/QĐ-BTC dated 20 September 2021, issued by The Ministry of Finance)

Tax declaration for transferring real estates not located in the same province as their headquarters

When a Vietnamese company with headquarter in Hanoi, transfers real estate not located in the same province as their headquarters (transfer of a house in Ha Long city, Quang Ninh province), Value-Added Tax (“VAT”) and CIT of such real estate transfer activity would be treated as follows:

- **VAT:**
 - ✓ The Company **declares VAT return (form No. 05/GTGT attached with Circular No. 156/2013/TT-BTC) using electronic method at the rate of 2% on VAT-exclusive transfer price and pay tax to the local tax authority where the activity of real estate transfer occurs.**
- **CIT:**
 - ✓ If the Company does not apply direct method, it would **make quarterly provisional CIT payment at the rate of 1% on total proceeds of real estate transfer via electronic method to local tax management authority where the real estate transfer activity occurs.**

- ✓ At the end of the tax year, the Company declares the annual finalization of all business incomes (including CIT amounts allocated to the province where the real estate transfer occurs) and deduct the provisional CIT payment paid.

The company is **not required to submit CIT return for the real estate transfer activity per Form 02** attached with Circular No. 151/2014/TT-BTC.

(Official Letter No. 8500/CTQNI-TTHT dated 28 October 2021, issued by Quang Ninh Tax Department)



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Corporation Income Tax



GUIDANCE RULING

Determining the related party relationship

When a company obtained a loan accounting for at least 25% of the owner's capital contribution and more than 50% of the total value of medium and long-term debts, the company is subject to the scope of regulations of Decree No. 20/2017/ND-CP and Decree No. 132/2020/ND-CP issued by the Government.

If the company is determined as an associated enterprise which has related party transactions, the Company would fall within the scope of application of Decree No. 20/2017/ND-CP and Decree No. 132/2020/ND-CP.

(Official Letter No. 37638/CTHN-TTHT dated 01 October 2021 issued by Tax Department of Hanoi City.

This Official Letter also has the same view as the Official Letter No. 2687/TCT-TTKT dated 20 July 2021 issued by the General Department of Taxation in earlier period)

Deductible expenses when determining CIT taxable income

When the Company has the policy of providing lunch and mid-shift allowances for employees and housing allowances for foreign experts, of which the conditions and level of entitlement are clearly specified in one of the documents such as Labor contract, Collective Labor agreement or financial regulation, etc., these allowances are considered as deductible expenses for CIT calculation purposes.

The noteworthy point of this official letter is the determination of the implemented wage fund including the entire salary, bonus, allowances, subsidies, PIT and compulsory insurance that the company has withheld and paid to the State budget. This guidance is also provided in Official Letter No. 21071/CT-HTr dated 19 April 2016 issued by Hanoi Tax Department previously.

(Official Letter No. 16186/CTBDU-TTHT dated 28 October 2021 issued by the Provincial Tax Department Binh Duong)

Deductible expenses when determining CIT taxable income derived from construction and installation activities

When the company purchase goods in relation to their business activities and such expenses meet the conditions specified in Article 4, Circular No. 96/2015/TT-BTC, they would be deductible when determining CIT taxable income.

If it was found out after tax inspection that the company incurs input expenses of which the invoice is issued after the date of issuing the output invoice and does not meet above conditions, the company is not allowed to treat such expenses as deductible for CIT calculation purposes and is sanctioned for administrative violations as prescribed in the Government's Decree No. 125/2020/ND-CP.

If the provider of goods and services issues invoices at the wrong time as prescribed, the administrative violations would be imposed as per Decree No. 125/2020/ND-CP on sanctioning administrative violations on taxes and invoices.

(Official Letter No. 43222/CTHN-TTHT dated 01 November 2021 issued by Tax Department of Hanoi City)



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Indirect Tax/ VAT and SCT



GUIDANCE RULING

Invoice issuance for in-kind sponsorship

If a company incurs expenses for in-kind sponsorship to field hospitals such as supplies, machinery, and equipment, input VAT related to these supplies, machinery and equipment shall be creditable.

When handing over such supplies, machinery and equipment to the hospitals, the Company shall issue VAT invoices and declare output VAT as if sales of similar or equivalent goods at the time of sponsorship.

(The Official Letter No. 17062/CTBDU-TTHT dated 09 November 2021 issued by Binh Duong Tax Department)

VAT declaration for real estate projects not located in the same province as their headquarters

If a company authorizes its dependent branch located in a different province to implement real estate project and transfer the real estate at that province, the branch must register for tax, declare and pay VAT using VAT credit method to the tax authority where the branch is located (where real estate business activities occur).

From 01 January 2022, VAT declaration for real estate transfer of investment projects shall be filed and paid to the tax authority where real estate transfer activities occur and VAT-exclusive revenue from real estate transfer shall be included to VAT returns of the headquarter to determine VAT payables for all business activities in line with the guidance at point b, Clause 3, Article 13, Circular No. 80/2021/TT-BTC issued by the Ministry of Finance on 29 September 2021.

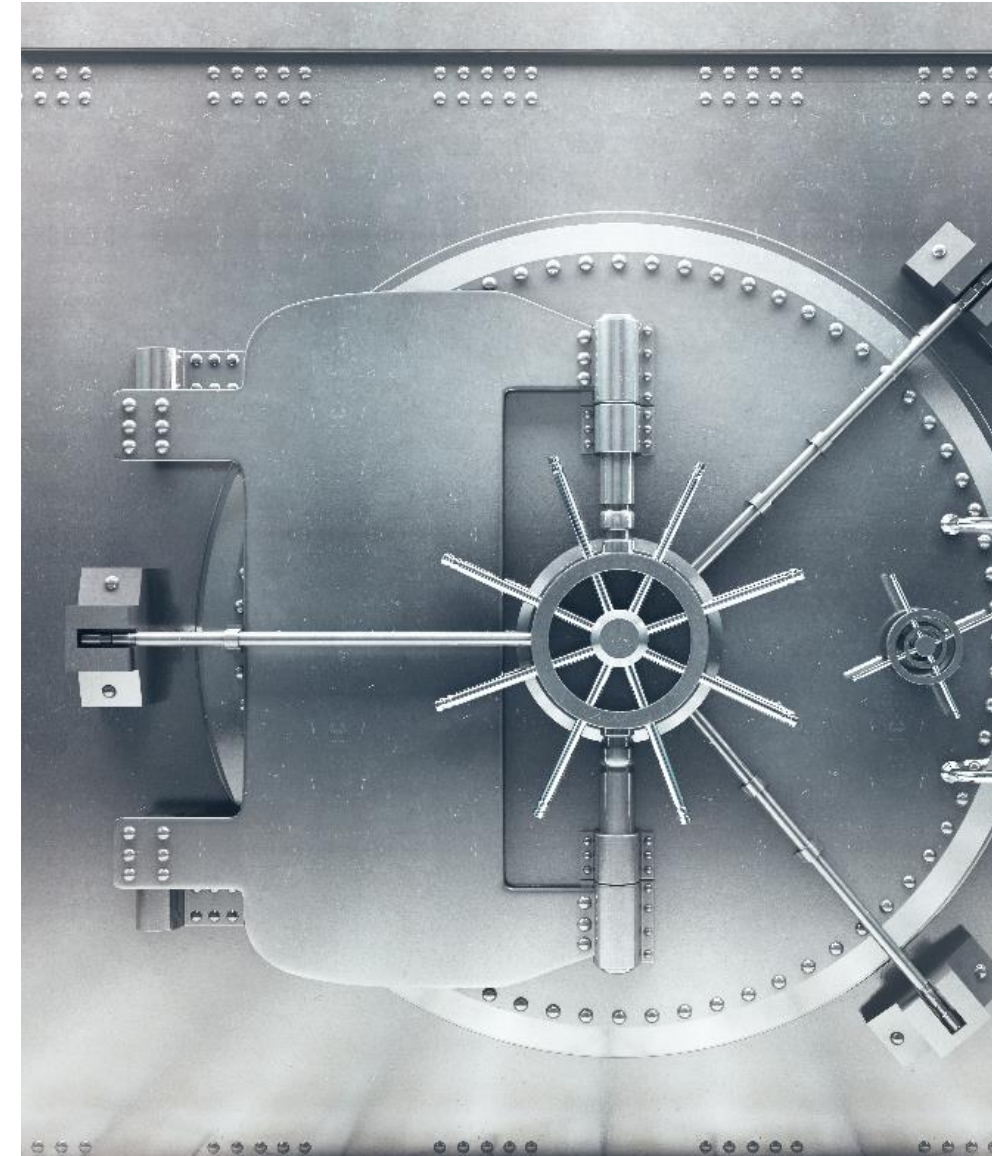
(Official Letter No. 44393/CTHN-TTHT dated 05 November 2021 issued by Hanoi Tax Department)



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Foreign Contractor Withholding Tax



GUIDANCE RULING

Foreign Contractor Withholding Tax (“FCWT”) levied on on-the-spot import and export

Sales of goods between Company A incorporated in Vietnam and Company B incorporated in overseas, in which goods are assigned by Company B to be delivered to a Vietnamese company (under **on-the-spot import and export**), **Company B is subject to FCWT in Vietnam** in compliance with Circular No. 103/2014/TT-BTC.

Companies that are designated to receive goods in Vietnam are responsible to declare, withhold and pay tax on behalf of Company B in accordance with Circular No. 156/2013/TT-BTC.

(Official Letter No. 16880/CTBDU-TTHT dated 03 November 2021, issued by Binh Duong Tax Department)

FCWT levied on income arising from sales of goods to Export Processing Enterprise (“EPE”) under delivery-at-place (“DAP”) delivery term

When a foreign contractor sells machinery and equipment to an EPE under **DAP delivery terms, the delivery place is at the EPE and not at the border gate**. Therefore, income generated from the sales of machinery and equipment of the foreign contractor to the EPE is governed by Circular No. 103/2014/TT BTC. FCWT rates are as follows:

- **VAT:** Not subject to VAT;
- **CIT:** 1%.

According to the Double Taxation Agreement (“DTA”), if the foreign contractor is a **Korean tax resident and derives incomes from sales of assets (machinery and equipment) to a Vietnamese Company, that are not assets regulated as per Clause 1, 2 and 3 Article 13 of the DTA**, then **such income is exempted from tax in Vietnam**. Tax relief under DTA is applicable to the tax amount incurred within three years prior to the time of submitting the DTA application dossier.

When a foreign contractor is eligible for **tax exemption/ reduction per the DTA, a notification of tax exemption/ reduction under the DTA should be submitted** in line with Clause 3, Article 20, Circular No. 156/2013/TT-BTC.

(Official Letter No. 3593/CTBGI-TTHT dated 06 August 2021, issued by Bac Giang Tax Department)

FCWT obligations levied on goods delivery under DDU terms

If a Vietnamese company **imports machinery from foreign contractor under DDU term**, in which the delivery place is inside Vietnam’s territory, incomes from the sales of machinery of the foreign contractor is subject to FCWT.

If the sales of machinery is **not associated with any services provided inside Vietnam**, FCWT rates is as follows:

- **VAT:** value of goods would only be subject to VAT at import stage as stipulated;
- **CIT:** 1% on taxable revenue for the supply of machinery and equipment.

(Official Letter No. 4782/CTBGI-TTHT dated 12 October 2021, issued by Bac Giang Tax Department)



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Foreign Contractor Withholding Tax



GUIDANCE RULING (cont.)

FCWT levied on contract for leasing international transportation

If a Vietnamese company enters into a contract with an international transport agency to deliver goods from Vietnam to overseas, the Vietnamese Company is responsible for declaring, withholding and paying tax on behalf of the foreign contractor as follows:

- **CIT:** 2% on CIT-able revenue;
- **VAT:**
 - ✓ **If the transport activities meets the conditions of contract and non-cash payment vouchers** as regulated in clause 2, Article 9, Circular No. 219/2013/TT-BTC: the foreign contractor **shall not pay VAT**;
 - ✓ **If the transport activity does not qualify the conditions** regulated in clause 2, Article 9, Circular No. 219/2013/TT-BTC: foreign contractor shall pay 3%-VAT on taxable revenue;

Taxable revenue is the charter fees for transporting goods and surcharges, fees and expenses that the Vietnamese Company must pay in accordance with the leasing contract according to the Official Letter No. 6142/BTC-CST dated 09 May 2016.

(Official Letter No. 2287/CTHPH-TTHT dated 07 September 2021, issued by Hai Phong Tax Department)

FCWT levied on goods accompanied with services

When a foreign contractor supplies materials, **goods in which goods are delivered inside Vietnam's territory** (except for case as stipulated in clause 5, Article 2, Circular No. 103/2014/TT-BTC); **or sales of goods is accompanied with services performed in Vietnam (including free-of-charge services), regardless service value is included in the total contract value or not, then:**

- **VAT:**
 - ✓ **Goods is only subject to VAT at import stage while service value is subject to VAT**;
 - ✓ **If value of goods and accompanying service could not be separated (including free-of-charge service), VAT shall be calculated on total contract value**;
 - ✓ VAT rate is determined in compliance with point a, clause 2, Article 12, Circular No. 103/2014/TT-BTC.

• CIT:

- ✓ **Taxable revenue is the total contract value including goods and service value**;
- ✓ CIT rate on taxable revenue is determined in compliance with point a, clause 2, Article 13 Circular No. 103/2014/TT-BTC.

(Official Letter No. 31556/CTHN-TTHT dated 13 August 2021, issued by Ha Noi Tax Department)



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Trade & Customs



GUIDANCE RULING

Tax policies on scraps, and defective finished goods arising from export processing, and manufacturing; Goods have to be re-exported abroad in their original conditions; and changes of usage purpose of goods, which are spare parts, components of import duty exempted fixed assets

1. For scraps, and defective finished goods arising from export processing, manufacturing process:

According to the provisions of Clauses 4, 6, Article 1, Decree No. 18/2021/ND-CP, enterprises will be exempted from paying import duty and customs declaration when scraps, defective finished goods arising from in the process of export processing, manufacturing are transferred for domestic consumption. However, the enterprises must declare, and pay VAT, special consumption tax, and environmental protection tax (if any) to the tax authority.

2. For imported goods that must be re-exported abroad in their original conditions:

- Goods imported, and then re-exported in their original conditions using the customs code B13 (exporting imported goods) will be refunded import duty, and not subject to export duty.

- In case the imported goods are re-exported in its original conditions but not using the customs code B13, the import duty will also be refunded if based on the re-export declaration, the Customs Authority determines that the exported goods are the previously imported goods, satisfying the conditions of being unused, unprocessed.

- Refund dossiers, and procedures are conducted in compliance with Article 34, Decree No. 134/2016/ND-CP amended, and supplemented in Decree No. 18/2021/ND-CP.

3. Change of usage purpose of imported goods that are components, and spare parts of import duty exempted fixed assets

- If an enterprise sells domestically spare parts, of goods that were imported to form fixed assets and exempted from import duty, then the customs declaration and duty treatment will be as follows:

- If at importation, the name, code of each spare parts are clearly stated on import declaration, before selling the spare parts, the enterprises must register a new tax declaration and fulfill tax obligation for the spare parts sold.

- If the goods are spare parts without detailed declaration of names, and codes specified on the first import declaration, so that the enterprises have no basis to declare the new customs declaration to change the usage purpose, the enterprises must provide the detailed information of goods' name, quantity, and customs value for customs authorities to impose tax in accordance with prevailing regulations. The enterprises are obliged to fulfill tax payment to the Customs authority before selling goods to domestic market.

(Official Letter No. 7252/TXNK-CST dated 01 October 2021 issued by General Department of Customs)



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Trade & Customs



GUIDANCE RULING (cont.)

Goods on-spot imported for processing under customs code A12 are not exempted from import duty

According to the provisions of Clause 4, Article 1, Decree No. 18/2021/ND-CP, on-spot imported goods are only exempted from import duty when registering import declaration under the customs code of import for processing if the following conditions are met:

- The taxpayer has a processing contract which is compliance with provisions of Decree No. 69/2018/ND-CP. The taxpayer shall specify the receipt number of the processing contract, and its appendices on the customs declaration; and
- The taxpayer or organization, individual that perform sub-contracting processing for taxpayers having the ownership, or usage right towards the export processing facility and machinery, equipment in the facility in Vietnam territory, and conducted the processing facility, subcontracting processing facility notification; the processing contract, subcontracting processing contract notification and their appendices to the customs authority.

For on-spot imported goods registered customs declaration under customs code A12 (import for domestic manufacturing), enterprises shall declare and pay import duty and other taxes corresponding to the customs code A12. If the enterprises have not declared, and paid tax, they must make additional declarations and pay the late payment interest in accordance with the law on tax administration.

(Official Letter No. 7251/TXNK-CST dated 01 October 2021 issued by General Department of Customs)

Goods authorized to import for export manufacturing are exempted from import duty

If an organization, or individual is eligible for import duty exemption, for goods imported under export manufacturing scheme, but authorizes another organization to import the goods on behalf of the organizations, or individuals to manufacture exported goods, the goods imported by the authorized organizations for export manufacturing, are exempted from import duty provided that the values of goods under the authorized contract does include import duty.

Entrusting organizations are responsible for notifications of manufacturing facilities, and preparing customs finalization reports as prescribed in Articles 56, and Article 60 of Circular No. 38/2015/TT-BTC dated 25 March 2015, amended and supplemented in clauses 36, clause 39, Article 1, Circular No. 39/2018/TT-BTC. The audit of manufacturing facilities shall be carried out by the Customs Authority to entrusting organizations.

Duty-exemption dossiers, and procedures, are regulated in Article 31, Decree No. 134/2016/ND-CP dated 01 September 2016, amended, and supplemented in clause 14, Article 1, Decree No. 18/2021/ND-CP dated 11 March 2021 issued by the Government.

This official letter replaces Official letter No. 3690/TCHQ-TXNK dated 22 July 2021.

(Official Letter No. 4948/ TCHQ-TXNK dated 20 October 2021 issued by General Department of Customs)



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Trade & Customs



GUIDANCE RULING (cont.)

Notification on the list of goods exempted from import duty

1. Regarding the Notification on duty exemption List:

- For goods imported to form fixed assets of an investment incentive project to be considered for import duty exemption, enterprises must notify on duty exemption List in accordance with the regulations.
- The Notification for duty exemption List must satisfy the conditions for duty exemption dossiers as prescribed in Article 30, Decree No. 134/2016/ND-CP dated 01 September 2016 of the Government, in which the decision on investment policy of the Hanoi People's Committee issued to the enterprise must still be valid for implementation. In case the project implementation progress of the enterprise has not been extended by the Hanoi People's Committee, it is not eligible to notify the duty exemption List.

2. Regarding customs clearance, or release of goods

If enterprises have not received Customs approval on the duty exemption list submitted, then in order to complete customs clearance, or release of goods procedures, the customs duty must be paid before customs clearance, or release of goods (not eligible for duty exemption at the time of customs clearance, or duty refund after customs clearance).

(Official Letter No. 4979/TCHQ-TXNK dated 21 October 2021 issued by General Department of Customs)

The Ministry of Finance (“MOF”) rejected the draft regulations on abolishing the discrete levels of imported automotive spare parts

The regulation on the discrete level of imported automotive spare parts has a legal-base proof, which had been assigned by the Government in Decree No. 57/2020/ND-CP. Since the regulations have been implemented for a long time for preferential policies for the automotive manufacturing, and assembling industry, under which no issue have arisen, and they are required regulations to implement the automotive industry development strategy as well as the Government's policy on the development of supporting industries. Therefore, if this regulation is abolished, it will create a legal gap in implementation, leading to issues. Therefore, MOF has the following opinion:

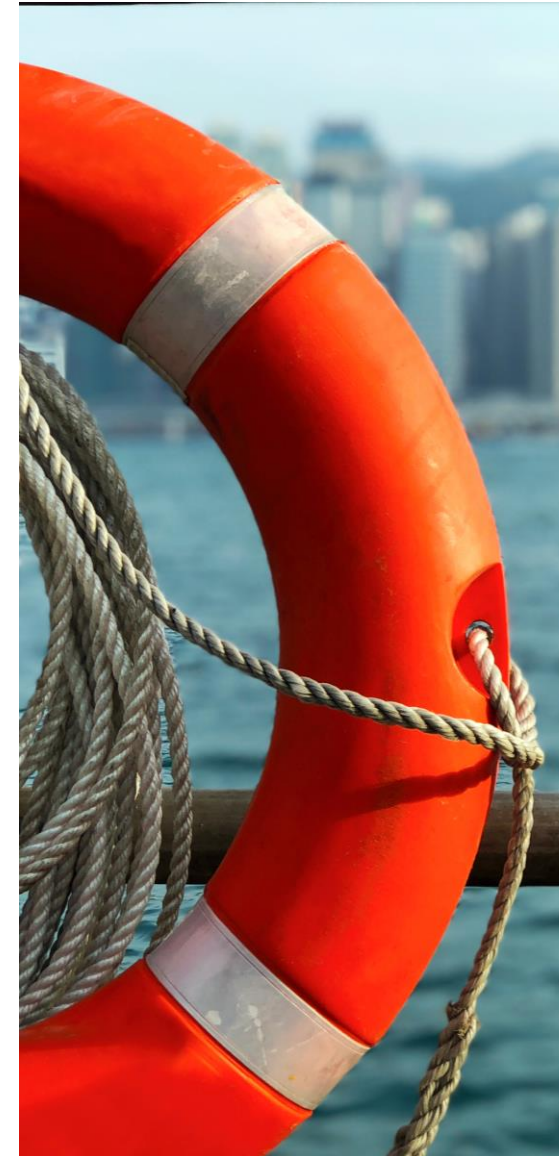
- Request the Ministry of Science and Technology not to abolish the regulation on the discrete level of imported automotive spare parts because this regulation is the basis for implementing policies related to the classification of CKD parts; implementing the duty incentive program for the manufacturing, and assembly of automobiles;

implementing a number of protocols that Vietnam has signed.

However, in case of necessity, the Ministry of Science and Technology can consider amending, and supplementing regulations on the discrete level of imported automotive spare parts to align with the current practical situation, and ensure the automotive industry development strategy under the direction of the Government.

- Regarding the abolishment of the localization rate, request the Ministry of Science and Technology to discuss with the Ministry of Industry and Trade on the regulations of the localization rate to ensure legal synchronization (Decision No. 1168/QĐ-TTg dated 16 July 2014 and the provisions at point d, clause 1, Article 29, Decree No. 116/2017/ND-CP dated 17 October 2017), without problems arise in implementation.

(Official Letter No. 12272/BTC-CST dated 26 October 2021 issued by Ministry of Finance)



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