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## Immigration



### RESOLUTION

#### Relaxation of conditions for foreigner treated as an expert/technician and documentation for Work Permit/Work Permit renewal application for foreigners working in Vietnam:

In September 2021, the Government directs localities to ease and flexibly implement several regulations, conditions in the Decree No. 152/2020/ND-CP dated 30<sup>th</sup> December 2020 (hereafter “Decree 152”) regarding the grant, renewals and certification of Work permits for foreign employees working in Vietnam, in accordance with new situation but extremely safe in terms of COVID-19 prevention and control, which is specified below:

#### Relaxation of conditions for foreigner treated as an expert/technician:

1. The provision at Point a, Clause 3, Article 3 of Decree 152 is implemented as follows: Having a bachelor’s degree or higher or equivalent and having at least 03 years of work experience relevant to the job position that the foreign employee will work in Vietnam.

2. The provision at Point a, Clause 6, Article 3 of Decree 152 is implemented as follows: Having been trained in major techniques or other majors for at least 01 year and having at least 03 years of working experience relevant to the job position that the foreign employee will work in Vietnam.

#### Updates of documentation for Work permit application:

3. The provision at Point b, Clause 4, Article 9 of Decree 152 is implemented as follows: Documents proving that experts, technicians, who are specified in Clauses 3 and 6, Article 3 of Decree 152, are: Diploma, certificate, confirmation letter; a written certification from an agency, organization or enterprise in a foreign country about the number of work experience years of experts, technicians or the issued Work permit to prove the experience.

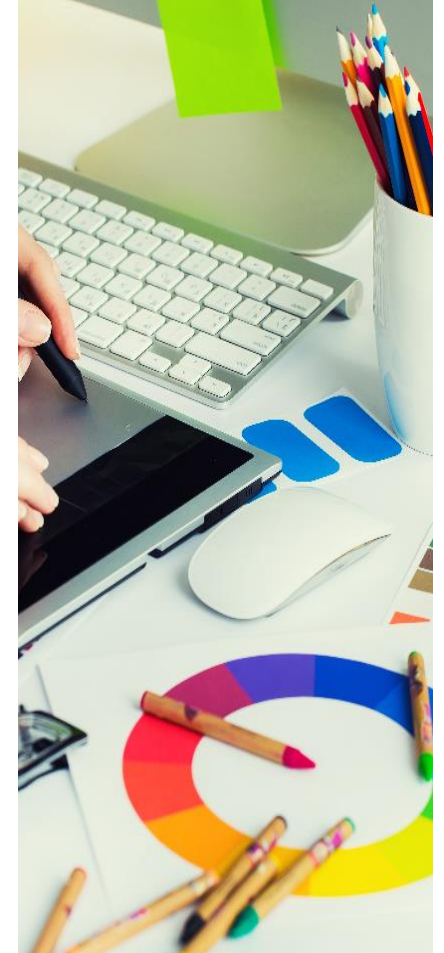
#### Updates of documentation for Work permit, Work permit renewal and exemption application:

4. The provision at Point d, Clause 3, Article 8; Clause 7 Article 9; Clause 5, Article 17 of Decree 152 is implemented as follows: A copy of the valid passport as regulated by law.

#### Other regulations:

5. Allow foreign employees whose granted Work permit is still valid, to be sent, transferred, or seconded to work in another province or city for a period not exceeding 06 months. The employer must report to the labor management authority where the foreign employee is assigned to work without having to re-issue the Work permit.

*(Resolution No. 105/NQ-CP issued by Government office dated 09<sup>th</sup> September 2021)*



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## Personal Income Tax



### SOCIAL INSURANCE DEBT RECOVERY PLAN

#### Ha Noi Tax Department will conduct social insurance inspection and tax audit at the same time

When conducting tax audits, tax inspection at the taxpayer's office, the Tax Department will also urge the company to pay social insurance premiums according to regulations. At the time issuing the inspection minute, the company is required to contribute sufficiently to Social Insurance in case they have yet to make such contribution. The company which has not yet participated in social insurance for employees must also participate and pay social insurance premiums in accordance with the law, and periodically notify the results to the social insurance department.

Through inspection, in case the tax authority detects any companies declaring that they have participated in social insurance for employees and have fully paid the social insurance premiums and took it into account as deductible expenses for tax purposes, but have not actually paid or owed social insurance contributions, the tax authority shall inform relevant authorities to handle such cases strictly according to the provisions of law.

*(Plan No. 194/KH-UBND dated August 26, 2021 of the Hanoi People's Committee)*

### NEW REGULATIONS

#### Additional allowance to probationary employees subject to PIT

In cases where a company pays additional allowance to the probationary employees (who are not subject to compulsory social insurance, health insurance, unemployment insurance) at the same time as the salary payment, such additional allowance which is regarded as cash payment, must be included in the individual's taxable income.

*(Official Letter No. 32076/CTHN-TTHT dated 19 August 2021 issued by Hanoi Tax Department)*



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## Tax Administration



### DECREE

#### Small and medium enterprises (“SMEs”) converted from household businesses will be exempted for license fee for 03 years from the date of initial Enterprise Registration Certificate (“ERC”)

Decree No. 80/2021/ND-CP issued on 26 August 2021 providing guidance on the Law on provision of assistance for the SMEs states that the SMEs converted from household businesses will be exempted from license fee for 03 years from the date of initial ERC.

### GUIDANCE RULLINGS

#### No administrative penalty on late submission of tax returns during the period of Directive No. 16/CT-TTg & Directive No. 17/CT-TTg in certain cases

Taxpayers who did not submit tax returns promptly following the law, during the quarantine period (including the period of social isolation according to the document of the Prime Minister, Government Office, isolation by region, area according to decision of local government agency, isolation according to notification decision of competent agency or state) would not be subject to tax administratively penalty in the following cases.

- Organizations or individuals whose head office or (permanent or temporary) address are in the isolated region, isolated area;
- Individuals who are in quarantine period according to a decision or notice of the competent authorities due to the Covid-19 pandemic

*(Official Letter No. 6770/CTTPHCM-KK issued on 19 July 2021 by Ho Chi Minh City Tax Department)*

*(Official Letter No. 29592/CTTPHN-KK issued on 29 July 2021 by Hanoi City Tax Department)*

#### Handling of tax overpayment

If a company has a tax overpayment, the company shall handle the overpayment in line with Article 33 of Circular No. 156/2013/TT-BTC.

If the company requests to adjust the contents of payment to the State budget which are recorded by the tax authorities, the company shall send form C1-11/NS of Circular No. 84/2016/TT-BTC, together with tax payment voucher or information related to the content requested for correction to the tax authorities.

*(Official Letter No. 3685/CTBGI-TTHT issued on 10 August 2021 by Bac Giang Province Tax Department)*

### CIRCULAR

#### Guidance on CIT arrears arising before qualifying conditions of socialization

The Ministry of Finance issued Circular No. 71/2021/TT-BTC on 17 August 2021 with effect from 26 August 2021 providing guidance on CIT arrears not yet collected from organization engaged in socialization activities under Resolution No. 63/NQ-CP dated 25 August 2014 of the Government.

Accordingly, organizations engaged in socialization activities need to self-declare or be collected taxes arrears by the tax authority for additional CIT liability arising before satisfying conditions of socialization (if any). When an organization engaged in socialization pays additional CIT liability before 02 November 2021, no penalty and late payment interest would be imposed.

*This Circular is applicable for organization engaged in socialization activities set up before 22 July 2016 (the effective date of Decision No. 1470/QD-TTg).*

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## Foreign Contractor Withholding Tax



### GUIDANCE RULINGS

#### Foreign Contractor Withholding Tax (“FCWT”) on commodity price Hedging

If a Vietnamese company signs a distribution contract with a foreign contractor that performs commodity price hedging to reduce risk exposures of input materials for the company:

- If the Vietnamese company receives the difference when performing the hedging in cargo insurance agreement:
- ✓ VAT:
  - i. Not subject to VAT if this income is determined as income from financial derivatives in line with the provisions of laws; or
  - ii. Not subject to VAT declaration and payment if the payment is regarded as other financial incomes and the company issues receipt vouchers instead.
- ✓ CIT: The company recognizes other income which is subject to CIT.

- If the local company pays the difference of hedging to the foreign contractor who do not meet one of the conditions for direct tax declaration in Vietnam, the local company is responsible for declaring, withholding, and paying taxes on behalf of the foreign contractor before paying income:

- ✓ CIT rate of 2% on revenue; and,
- ✓ VAT:
  - i. Not subject to VAT if this income is determined as income from financial derivatives in line with the provisions of laws; or
  - ii. Not subject to VAT declaration and payment if the payment is regarded as other financial incomes.

*(The Official Letter No. 2356/CT-TTHT dated 26 July 2021, issued by Long An Tax Department)*

#### FCWT implications on goods imported from foreign joint venture partners

In the situation where a foreign company which entered a partnership with a Vietnamese company provides goods in Vietnam under the delivery term of Incoterms, in which, the seller bears the risks related to the goods delivered into the Vietnamese territory, this foreign contractor is subject to Vietnamese FCWT.

*(Official Letter No. 31558/CTHN-TTHT dated 13 August 2021, issued by Hanoi Tax Department)*

#### Value Added Tax (“VAT”) when transferring part of an investment project

When a company transfers a part of an investment project to another company, if the transferee continues to implement the project as regulated, qualifying conditions of investment project under Law on Investment and Law on Real Estate and for productions and provisions of goods and services subject to VAT, the transferor is not required to declare, calculate, and pay VAT when transferring such part of investment project.

If any of the above conditions are not satisfied, the transferor must declare, calculate, and pay VAT as regulated.

*(The Official Letter No. 12482/CTBDU-TTHT dated 12 August 2021 issued by Binh Duong Tax Department)*



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## Foreign Contractor Withholding Tax



### THE FIRST DRAFT OF ADMENDMENTS AND SUPPLEMENTS TO LAW ON SPECIAL SALE TAX

#### First draft of amendments and supplements to Law on Special Sale Tax

The draft supplements SST-able subject (i.e., battery electric cars) into Clause 4, Section I, Article 7 of Law on Special Sale Tax.

Accordingly, the tax rates for battery electric cars are from 2% to 10% subject to the specific application timeframe and seating capacity. Specially, the applicable tax rates between battery electric cars with 9 seats and below, from 10 to under 16 seats, from 16 to less than 24 seats, and ones designed to carry both passengers and goods, as well as applicable tax rates from the effective date of the Law and from the 6th year since the effective date of the Law are different.

Draft No. 1 was issued on 25 August 2021 and has not come into effect yet.



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## Corporate Income tax



### GUIDANCE RULLINGS

#### Tax incentives for seafood processing activities

From the tax period of 2015, income from seafood processing activities if satisfying the prescribed conditions, is entitled to Corporate Income Tax ("CIT") incentives as follows:

- Income arising in areas with **extremely difficult socio-economic conditions** is **exempt** from CIT.
- Income arising in the areas with **difficult socio-economic conditions** would be subject to the preferential tax rate of **10%**.

*(The Official Letter No. 2753/TCT-CS dated 23 July 2021 issued by the General Department of Taxation)*

#### CIT policies for income generated in Taiwan and paid tax in Taiwan

In the situation where a company earned income in Taiwan (Double Taxation Avoidance was signed ("DTA" or "Agreement") with Vietnam) in 2020, and was subject to CIT (or another tax which is similar as CIT) in Taiwan, and the paid tax amount is in line with the provisions of foreign laws and the provisions of the Agreement, **the paid tax amount (or considered as paid) in Taiwan will**

**be deducted from the tax payable in Vietnam** if qualifying the conditions and the principles regulated in Article 48, Circular No. 205/2013/TT-BTC dated 24 December 2013 issued by the Ministry of Finance.

The Company is required to carry out procedures to deduct the overseas tax payments arising no more than **03 years** prior to the time of adoption the DTA application between Vietnam and overseas countries/regions, unless otherwise stated the beneficial limitation under the Agreement, according to guidance in Clause 4, Article 44, Circular No. 156/2013/TT-BTC dated 6 November 2013 issued by the Ministry of Finance.

The Company shall declare the deductible CIT amount paid abroad in the tax period in **Appendix No. 03-4/TNDN** enclosed with Circular No. 156/2013/TT-BTC and **item No. C15** (the deductible income tax paid abroad in the tax period) **of the CIT finalization** declaration (form No. 03/TNDN) enclosed with Circular No. 151/2014/TT-BTC.

*(The Official Letter No. 31912/CTHN-TTHT dated 17 August 2021 issued by the Hanoi Tax Department)*

#### CIT incentives policy for investment projects of software production changing legal representative

If a company was established under the initial Investment Certificate in 2012 and registered several business lines including "software production" activities, if the Company (i) is newly established from investment projects of software production according to regulations and (ii) does not fall to cases specified at Point b, Clause 2, Article 18, Circular No. 123/2012/TT-BTC dated 27 July 2012 issued by the Ministry of Finance, the Company shall be entitled to CIT incentives for "software production" income as prescribed.

If after a period of operation, the Company registers to change its legal representative, if this change does not affect the conditions for enjoying CIT incentives, the Company shall continue enjoying CIT incentives for the remaining time.

*(The Official Letter No. 31451/TCT-CS dated 12 August 2021 issued by the Hanoi Tax Department)*

#### CIT incentives policy for investment project changing its location

Pursuant to Clause 8, Article 18, Circular No. 78/2014/TT-BTC dated 18 June 2014 issued by the Ministry of Finance, during CIT incentive enjoyment period, if a company fails to meet conditions for enjoying tax incentives in a given tax year as regulated, the Company shall not be eligible for incentives in that tax year and such year shall be excluded from its CIT incentive enjoyment period.

Accordingly if a Company, that was eligible for CIT incentives, because the project was conducted in a designated industrial park, relocated the project to other industrial park, the Company shall no longer meets the conditions for enjoying tax incentives due to its location in the industrial park, and thus has not eligible for CIT incentives since the year of relocation.

*(The Official Letter No. 1784/TCT-CS dated 28 May 2021 issued by the General Department of Taxation)*



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## Trade and Customs



### GUIDANCE RULINGS

#### The policies to support the development of agricultural machinery and equipment production

The Ministry of Finance (“MOF”) provides comments to recommendations on changes to import tax and VAT policies, as follows:

1. **Regarding the proposal to reduce import duty of asynchronous parts and components, used for the production and assembly of engines, agricultural machines, from 10% or 20% (as currently), to 0% or 5%, MOF commented that:**
  - The MFN rates for imported goods are regulated based on the principles of Law on export duties and import duties, and in line with international commitments. Enterprises can utilize the benefits from the Free Trade Agreements agreed between Vietnam, and other countries, to enjoy the preferential tariff (e.g., reduced to 0%), for imported goods.

- If enterprises want to propose the reduction on the MFN rates, enterprises will need to provide specific details on goods description, HS codes, specifications, and enterprises’ production capacity. This information is needed in order for MOF to have basis for consideration, and report to Government for amendment, revision of MFN rates in the future.
- 2. **Regarding the proposal to amend the VAT policy applied for machinery and equipment used in agriculture (M&E):**
  - According to MOF, changing M&E from goods that are not subject to VAT to being subject VAT at 0% rate, will be not consistent with current policies and international practices;
  - However, MOF recognizes the proposal of applying 5% VAT for M&E, and will report to Competent authorities during the process of amending Law on VAT in the future.

*(Official Letter No. 7870/BTC-CST dated 16 July 2021 issued by the MOF)*

#### Guidance on the declaration of customs mode in export customs declaration for imported goods that subject to be re-exported/ returned

When registering re-export customs declaration for goods originally imported (not subject to any processing) but need to be returned to the goods owner, exported overseas or to non-tariff zones, the declarant shall: -

- Declare the export mode of B13 for cases where the exporter is the original Importer, or others authorized by the Import original Importer; and the goods meet the conditions for export duty exemption and import duty refund.
 

In the 'Notes' field of the e-Export Declaration, or in 'Other notes' of paper Export Declaration, it is required to declare accurately: -

  - the number of the original Import Declaration; and
  - the text of 'Goods subject to export duty exemption and import duty refund'.

- Declare the export mode of B11 for cases where the exporter does not wish to apply for export duty exemption and import duty refund; or where the exporter is not the original Importer, or others authorized by the Import original Importer.
 

In 'Notes' field of the e-Export Declaration, or in 'Other notes' of paper Export Declaration, it is required to clearly specify the text of 'This Customs declaration will not be used for export duty exemption and import duty refund application'.

*(Official Letter No. 4032/TCHQ-GSQL dated 16 August 2021 issued by the General Department of Customs).*

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## Trade and Customs



### GUIDANCE RULINGS (cont.)

#### Guidance on the duty policies for goods imported for processing activities, but the importer does not have the processing facilities

According to Clause 4, Article 1 of Decree 18/2021/ND-CP, one of the duty exemption conditions applied for goods imported for processing is that the taxpayers (or outsourcing organizations/ individuals) have rights to own, or use the processing facilities, and the machinery and equipment at processing facilities, in Vietnam territory.

Accordingly, in case an enterprise importing goods for export processing but not owning the processing facility, the imported goods are not satisfied for duty exemption.

*(Official Letter No. 4065/TCHQ-TXNK dated 17 August 2021 issued by the General Department of Customs)*

#### Guidance on the conditions to apply 5% of VAT rate for medical devices

Pursuant to the guidance of Circular No. 43/2021/TT-BTC dated June 11, 2021 issued by MOF, the imported medical devices will be able to apply VAT rate at 5%, if satisfy following requirements on: -

- Import License; or
- Certificate of circulation registration; or
- Receipt notes of standard publication dossiers, in accordance with the regulations on health; or
- Being included in List of medical devices subject to specialized management control of Ministry of Health.

*(Official Letter No. 4069/TCHQ-TXNK dated 18 August 2021 issued by the General Department of Customs)*

#### Guidance on the tax policies for goods imported to build the offices for Export Processing Enterprises (EPEs)

In case that domestic enterprises as sub-contractor imports goods from overseas into Vietnam to implement the bid under Agreements signed with main contractor to build the factories, offices, or install the equipment for enterprises located in Free trade zone, the imported goods will be subject to import duty and import VAT according to regulations.

GDC (General Department of Customs) requests Customs Departments of provinces and cities, to inspect, review, and collect the duties, for cases of non-declaration and duty payment at importation stage in compliance with regulations.

*(Official Letter No. 4199/TCHQ-TXNK dated 27 August 2021 issued by the General Department of Customs)*

#### Strengthen the management over VAT refund

On 27/08/2021, Ministry of Finance issued OL no. 9877/BTC-VP to request General Department of Tax, and General Department of Customs, to strengthen the management over VAT refund, including notable actions as follows:

- Strictly inspect the VAT refund application dossiers, and enhance audits before, during, and after VAT refund;
- Strengthen the application of technology during VAT refund management, and using e-invoices;
- Timely detect signs of law violation, apply strict enforcement to organizations, individuals who utilize the VAT refund policies for fraud, using fake invoices, etc.
- Closely collaborate with Local authorities, and other authorities.

*(Official Letter No. 9877/BTC-VP dated 27 August 2021 issued by MOF)*



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 **Trade and Customs**

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## **GUIDANCE RULINGS (cont.)**

### **Guidance on duty policy for materials, parts, components imported for manufacturing of goods subject to Special Consumption Tax (SCT)**

According to Clause 13, Article 16 of Law on export duties and import duties, the materials, parts, components that are not domestically produced, and used for manufacturing automobile subject to SCT, will not be eligible for duty exemption for 05-year period.

*(Official Letter No. 4249/TCHQ-TXNK dated 30 August 2021 issued by the General Department of Customs)*

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