



September 2026 Newsletter

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1 Reduction of Personal and Corporate Income Tax for Individuals and Enterprises

Resolution No. 43/2026/QH16 dated August 24, 2026 of the National Assembly on reduction of personal income tax and corporate income tax for individuals and enterprises:

- A 30% reduction in the personal income tax payable for the 2026 and 2027 tax periods on income from business activities of resident individuals whose annual revenue in 2026 and 2027 does not exceed VND 10 billion.
- A 30% reduction in the corporate income tax payable for the 2026 and 2027 tax periods on income of enterprises and organizations established in accordance with Vietnamese law whose annual revenue in 2026 and 2027 does not exceed VND 10 billion; except for enterprises formed through the division or separation of enterprises after the effective date of this Resolution, where the total annual revenue in 2026 and 2027 of the enterprises after the division or separation exceeds VND 10 billion. In case an enterprise is enjoying tax incentives under the Law on Corporate Income Tax or other laws or resolutions of the National Assembly, the corporate income tax reduction prescribed in this Clause shall be calculated based on the corporate income tax payable after deducting tax incentives.

1 Reduction of Personal and Corporate Income Tax for Individuals and Enterprises

- This Resolution takes effect from August 24, 2026 and applies to the 2026 and 2027 tax periods.

Guidance on Provisional Personal Income Tax Payments for Household and Individual Businesses

OL No. 6360/CT-PC dated August 26, 2026 of the Ministry of Finance on promoting communication and providing guidance to business households and individuals on the provisional payment of personal income tax as follows:

1. Regarding the declaration and provisional payment of personal income tax

Pursuant to Point b, Clause 2, Article 10 of Decree No. 68/2026/ND-CP dated March 5, 2026 of the Government, business households and individuals subject to personal income tax under the method of taxable income multiplied (x) by the tax rate shall declare provisional personal income tax on a monthly or quarterly basis in the same value-added tax return. The provisional personal income tax payable is determined using the simple method:

PROVISIONAL PERSONAL INCOME TAX PAYABLE = MONTHLY/QUARTERLY TAXABLE REVENUE × TAX RATE

Guidance on Provisional Personal Income Tax Payments for Household and Individual Businesses

Where:

- **Taxable revenue** is revenue arising during the period from production and business activities and from goods and services;
- **Tax rate:** applied according to each business sector and field as prescribed by law.

Note: The deadlines for submission of tax declaration dossiers and tax payment shall comply with the provisions of the law on tax administration. At the end of the tax year, business households and individuals shall declare personal income tax finalization in accordance with regulations.

2. In case of multiple business locations

Pursuant to Point b, Clause 4, Article 8 of Decree No. 68/2026/ND-CP, in case a business household or individual conducts business activities at multiple locations, revenue shall be declared and value-added tax shall be paid for each business location; personal income tax shall be paid at the head office.

Guidance on Provisional Personal Income Tax Payments for Household and Individual Businesses

3. Upon finalizing tax at year-end

Pursuant to Point a, Clause 5, Article 10 of Decree No. 252/2026/ND-CP, business households and individuals subject to personal income tax finalization shall submit the tax finalization dossier no later than the last day of the third month from the end of the tax finalization period.

In case the provisional personal income tax paid is lower than the tax payable upon finalization, pursuant to Point b, Clause 2, Article 10 of Decree No. 68/2026/ND-CP, business households and individuals shall pay the additional amount of the difference and are not required to calculate late payment interest on the additional tax payable. In case the tax already provisionally paid is greater than the tax payable according to the finalization, the overpaid tax amount shall be handled in accordance with Article 12 of Decree No. 68/2026/ND-CP.

3 PIT Policy

OL No. 11805/NBI-QLDN1 dated September 9, 2026 of the Ninh Binh Provincial Tax Department on personal income tax policies is as follows:

1. Regarding salary for working at night.

In case the Company pays employees an additional salary for working at night equal to 35% of the salary calculated based on the salary unit or the actual salary paid for the work of a normal working day, such payment is in accordance with Clause 2, Article 98 of the 2019 Labor Code, the above additional salary for working at night is exempt from personal income tax under Clause 1, Article 26 of Decree No. 253/2026/ND-CP.

3 PIT Policy

2. Regarding deductions for medical, education and training expenses.

In case an employee incurs medical, education and training expenses that fully satisfy the conditions prescribed in Article 49 of Decree No. 253/2026/ND-CP and requests that such expenses be deducted from income before tax calculation, the Company shall, based on the dossiers, invoices and documents provided by the employee, determine the deductible amount in accordance with regulations. An employee who requests the application of the above deductions must directly conduct personal income tax finalization in accordance with Clause 3, Article 51 of Decree No. 253/2026/ND-CP and is not eligible to authorize the Company to conduct the tax finalization on their behalf. When conducting the 2026 personal income tax finalization as an income-paying organization, the Company shall make declarations using the forms prescribed in Point 7.1, Appendix I issued together with Circular No. 89/2026/TT-BTC dated June 30, 2026 of the Ministry of Finance. In particular, regarding the presentation of this deduction on the personal income tax withholding certificate, the Company shall comply with Article 23 of Decree No. 254/2026/ND-CP dated June 30, 2026 of the Government prescribing electronic invoices and electronic documents.

3 PIT Policy

3. Regarding personal income tax withholding for employees who have left their jobs:

In case the Company incurs a salary payment of VND 5 million or more to an employee who has left the Company, a 10% tax withholding shall be made in accordance with regulations. When conducting personal income tax finalization, the Company shall make declarations using the tax return form prescribed in Appendix I of Circular No. 89/2026/TT-BTC. Accordingly, individuals subject to tax calculated according to the partially progressive tax schedule shall be included in Schedule 05-1/BK-QTT-TNCN, while individuals subject to tax calculated according to the flat tax rate shall be included by the Company in Schedule 05-2/BK-QTT-TNCN.

4 Personal Deductions for Personal Income Tax Calculation

OL No. 6846/CT-QLNT dated September 15, 2026 of the Tax Department providing guidance on family circumstance-based deductions when calculating personal income tax is as follows:

In case the taxpayer's biological father has reached the working age limit or is incapable of working, he may be considered a dependent for the purpose of calculating family circumstance-based deductions.

If the taxpayer's biological father is still of working age, he must simultaneously satisfy the following conditions: he is incapable of working (a person with a working capacity impairment rate of 81% or higher as determined in accordance with the law) and has no income or has an average monthly income in the year from all sources of income not exceeding VND 3 million, in order to be considered a dependent for the purpose of calculating family circumstance-based deductions.

5 Personal Deductions for Personal Income Tax Calculation

OL No. 47199/HAN-QLDN5 dated September 18, 2026 of the Tax Department on the tax policy regarding deductions from taxable personal income for medical and education expenses as follows:

To ensure the rights and benefits of employees who are individuals earning income from salaries and wages to have medical and education expenses deducted from taxable personal income, the Hanoi City Tax Department requests:

- Organizations operating in the medical and education sectors to properly comply with regulations on the issuance and use of invoices, the timing of invoice issuance, and the preparation of statements of medical examination and treatment expenses in accordance with Decree No. 254/2026/ND-CP dated June 30, 2026 of the Government and Decision No. 697/QD-BYT dated March 19, 2026 of the Ministry of Health.
- Enterprises and organizations employing workers: Disseminate and communicate to all employees the provisions on deductions from taxable personal income for medical and education and training expenses of taxpayers and their dependents. Specifically:

5 Personal Deductions for Personal Income Tax Calculation

- Conditions for income deduction: There must be complete and valid invoices and supporting documents (for medical expenses, a statement of medical examination and treatment expenses in the prescribed form is additionally required); the invoice must fully state the information of the taxpayer or the taxpayer's dependent; these expenses must not simultaneously be paid from other sources of support that are not directly paid by the employee.
- Income received by employees for medical and education and training expenses specified at Points b, g and i, Clause 4, Article 8 of Decree No. 253/2026/ND-CP, because they are determined to be income not in the nature of salaries and wages and are not included in taxable personal income, shall therefore not be included in the deductions when calculating taxable personal income.
- Medical expenses (serious illnesses) under Article 40 of Decree No. 253/2026/ND-CP are subject to tax reduction and therefore shall not be included in the deductions when calculating taxable personal income.

5 Personal Deductions for Personal Income Tax Calculation

- Where an employee requests a deduction from income for the above-mentioned education and medical expenses when calculating tax, the taxpayer may not authorize the income-paying organization to conduct tax finalization and must personally conduct personal income tax finalization.
- The Department of Health, the Department of Education and Training, and the People's Committees of Wards and Communes are requested to pay attention to and coordinate in directing medical and educational establishments operating within Hanoi City to properly comply with the regulations on the issuance and use of invoices and the preparation of statements of medical examination and treatment expenses in accordance with the above-mentioned regulations.

6 Time of determining taxable revenue for corporate income tax purposes

OL No. 16658/DON-QLDN1 dated August 27, 2026 of the Dong Nai City Tax Department on the time for determining revenue for corporate income tax purposes is as follows:

In case the Company has exported goods, the time for determining revenue for corporate income tax purposes shall be the date of transfer of ownership as specified in the goods export contract. In case the time of transfer of ownership cannot be determined, the time for determining revenue for corporate income tax purposes shall be based on the regulations on the basis for determining exported goods under the customs laws as prescribed in Clause 1, Article 5 of Circular No. 20/2026/TT-BTC dated March 12, 2025 of the Ministry of Finance.

7 VAT Policy

OL No. 6467/CT-QLNT dated August 28, 2026 of the Ministry of Finance on tax policies as follows:

Point m, Clause 2 and Clause 3, Article 9 of Law on Value-Added Tax No. 48/2024/QH15 stipulate:

“Article 9. Tax rates

2. The 5% tax rate shall apply to the following goods and services:

m) Scientific and technological services as prescribed by the Law on Science and Technology;

3. The 10% tax rate shall apply to goods and services not specified in Clauses 1 and 2 of this Article, including services provided by foreign suppliers having no permanent establishment in Vietnam to organizations and individuals in Vietnam through e-commerce channels and digital platforms.”

Point o, Clause 1, Article 37 of the Law on Tax Administration stipulates:

“o) No administrative penalties for violations of tax administration and invoices shall be imposed, and late payment interest shall not be charged, in cases where the taxpayer fulfills tax and invoice obligations in accordance with an administrative document or handling decision issued by the tax administration authority or another competent state authority relating to the determination of the taxpayer’s tax and invoice obligations;”

Clause 3, Article 26 of Decree No. 252/2026/ND-CP dated June 30, 2026 of the Government stipulates:

“3. Cases where late payment interest shall not be charged:

- c) The case specified in Point o, Clause 1, Article 37 of the Law on Tax Administration;
- d) Cases where late payment interest shall not be charged as prescribed by law;”

7 VAT Policy

Based on the above provisions, where intellectual property services are determined to be scientific and technological services as prescribed by the Law on Science and Technology, they shall be subject to the 5% VAT rate. Cases where late payment interest shall not be charged shall be implemented in accordance with the provisions of tax administration law.

8 Standardizing certain aspects in resolving VAT refund issues

OL No. 4936/CT-QLTT dated September 18, 2026 of the Tax Department providing guidance on the uniform implementation of certain contents in the settlement of VAT refund claims as follows:

Handling of VAT refund claims based on classification results

a) For claims subject to refund-before-inspection:

- Where the Tax Administration Information System determines that part of the refund amount requested in the claim poses tax administration risks, the tax authority shall issue a notice that such amount is subject to inspection before refund in accordance with Circular No. 89/2026/TT-BTC.
- The remaining amount shall continue to be processed under the refund-before-inspection procedure and shall be refunded when all prescribed conditions are satisfied. Where the System determines that part of the refund amount requested poses risks, only the risky portion shall be considered and processed, and the entire refund amount requested shall not be transferred to the inspection-before-refund category, except where the claim falls under the cases subject to inspection before refund as prescribed by law.

8 Standardizing certain aspects in resolving VAT refund issues

- The tax authority shall not wait for the results of the inspection and verification of the risky portion before processing the remaining amount if such remaining amount already satisfies the conditions for processing under the refund-before-inspection procedure.
- For the amount subject to inspection before refund, requests for explanation and supplementation of information and documents, as well as inspection and verification, must be associated with the relevant contents, transactions, invoices, and amount requiring clarification; the scope shall not be expanded merely because a risk warning arises in an entity within the supply chain, except where additional risk indicators are identified during the inspection and verification or where the case falls under those subject to inspection as prescribed.

8 Standardizing certain aspects in resolving VAT refund issues

b) For claims subject to inspection before VAT refund:

The tax authority shall carry out the inspection-before-refund procedure for the claim in accordance with Article 30 of Decree No. 252/2026/ND-CP and Articles 48 and 49 of Circular No. 89/2026/TT-BTC; based on the results of the inspection and verification, the tax authority shall clearly determine the amount eligible for refund, the amount not eligible for refund, and the amount not yet eligible for refund in accordance with regulations.

9 Standardizing certain aspects in resolving VAT refund issues

OL No. 7018/CT-QLNT dated September 22, 2026 of the Tax Department on the uniform implementation of certain contents in the settlement of VAT refund claims as follows:

In principle, where a business establishment has exported goods or services in a month or quarter and has input value-added tax that has not been fully credited in the amount of VND 300 million or more, it shall be considered for a VAT refund on a monthly or quarterly basis, except in cases where imported goods are subsequently exported to another country.

The determination of the amount of VAT eligible for refund for exported goods and services shall comply with Article 7 of Circular No. 69/2025/TT-BTC dated July 1, 2025 of the Ministry of Finance. Accordingly, the input VAT on goods (including fixed assets) and services carried forward from the previous period, and the input VAT on goods (including fixed assets) and services incurred during the period and used for the production and business of exported goods and services, shall be aggregated to determine the input VAT creditable for the production and business of exported goods and services.

9 Standardizing certain aspects in resolving VAT refund issues

The method of declaring the relevant indicators on the VAT declaration forms has been clearly guided in each form issued together with Circular No. 81/2021/TT-BTC (as amended and supplemented by Circular No. 40/2025/TT-BTC).

10 Principles for imposing administrative penalties for tax and invoice violations

Consolidated Document No. 27/2026/VBHN-NĐ-BTC dated August 27, 2026 consolidating the Decrees on penalties for administrative violations in the field of tax and invoices specifies the principles for imposing administrative penalties for violations of tax and invoice regulations as follows:

1. Administrative penalties for violations of tax and invoice regulations shall be imposed in accordance with the provisions of the law on tax administration and the law on handling administrative violations.
2. Organizations and individuals shall only be subject to administrative penalties for violations of tax and invoice regulations when they commit administrative violations of tax and invoice regulations as prescribed in this Decree.
3. Organizations and individuals that commit multiple administrative violations shall be penalized for each violation, except for the following cases:

10 Principles for imposing administrative penalties for tax and invoice violations

- a) [6] In case, on the same day, a taxpayer incorrectly declares one or more items on tax declaration dossiers, the incorrect declaration, which is subject to penalties for violations of tax procedures, shall only be penalized for one act of incorrectly declaring an item on the tax declaration dossier with the highest fine bracket among the violations committed as prescribed in this Decree;
- b) [7] In case, on the same day, a taxpayer delays the submission of multiple tax declaration dossiers for the same tax, the taxpayer shall only be penalized for one act of late submission of a tax declaration dossier with the highest fine bracket among the violations committed as prescribed in this Decree.

In case any of the late-submitted tax declaration dossiers constitutes a case of tax evasion, such violation shall be separately handled and penalized as an act of tax evasion;

- c) [8] In case, on the same day, a taxpayer delays the submission of multiple notices or reports of the same type relating to invoices, the taxpayer shall be penalized for one act of late submission of notices or reports relating to invoices with the highest fine bracket among the violations committed as prescribed in this Decree;

10 Principles for imposing administrative penalties for tax and invoice violations

- d) [9] An act of violating regulations on the provision of information for information exchange purposes in accordance with the laws of Vietnam, treaties or international agreements on taxation to which the Socialist Republic of Vietnam is a member or signatory, which is subject to penalties under Article 19a, shall not be penalized under Articles 14, 15 and 19 of this Decree.
- e) [10] In case a taxpayer commits multiple acts of issuing invoices at an incorrect time, where the violations are still within the statute of limitations for imposing penalties and are penalized in a single administrative violation case, the taxpayer shall only be penalized for one act of issuing invoices at an incorrect time, with the fine bracket corresponding to the number of invoices issued at an incorrect time as prescribed in Clause 2, Article 24 of this Decree;
- f) [11] In case a taxpayer commits multiple acts of failing to issue invoices, where the violations are still within the statute of limitations for imposing penalties and are penalized in a single administrative violation case, the taxpayer shall only be penalized for one act of failing to issue invoices, with the fine bracket corresponding to the number of invoices issued at an incorrect time as prescribed in Clause 3, Article 24 of this Decree;

10 Principles for imposing administrative penalties for tax and invoice violations

- g) [12] In case a taxpayer incorrectly declares multiple items on a single tax declaration dossier, which is subject to penalties for violations of tax procedures, the taxpayer shall only be penalized for one act of incorrectly declaring an item on the tax declaration dossier with the highest fine bracket among the violations committed as prescribed in this Decree.
- h) In case a taxpayer incorrectly declares multiple items on a single tax declaration dossier, which is both subject to penalties for violations of tax procedures and subject to penalties under Article 16 or Article 17 of this Decree, the taxpayer shall only be penalized for one violation under Article 16 or Article 17 of this Decree.
- 4. In case a single administrative procedure contains multiple dossier components and more than one administrative violation is prescribed under this Decree, the violating organization or individual shall be penalized for each violation.
- 5. For the same administrative violation of tax and invoice regulations, the fine imposed on an organization shall be twice the fine imposed on an individual, except for the fines for violations prescribed in Articles 16, 17 and 18 of this Decree.

11 Tax and Invoice Policy

OL No. 6656/CT-QLNT dated September 9, 2026 of the Tax Department on tax and invoice policies is as follows:

1. Regarding the use of invoices

For operating electricity expenses, if the Partner is the party directly paying the electricity bill to the electricity supplier and the Company reimburses the Partner the exact amount of the actual operating electricity expense incurred based on the electricity meter readings, electricity bill, and reconciliation results between the two parties, such amount shall be considered a reimbursement of expenses as agreed.

The Company shall, based on the provisions of the Contract, determine such receipt. If it falls under the case specified in Point b, Clause 1, Article 14 of Decree No. 181/2025/ND-CP, it shall not be included in the taxable price and falls under the case where an electronic invoice is not required to be issued in accordance with Point c, Clause 8, Article 7 of Decree No. 254/2026/ND-CP.

11 Tax and Invoice Policy

2. Regarding deductible expenses for determining taxable income:

For electricity payments made by the Partner to the electricity supplier, after which the Company reimburses the Partner the exact amount based on the actual electricity consumed by the charging station: The Company is requested to refer to Clause 1, Article 9 of Law on Corporate Income Tax No. 67/2025/QH15 and Clause 1, Article 9 of Decree No. 320/2025/ND-CP. If all of the following conditions are satisfied:

- i. The expense is actually incurred and related to the enterprise's production and business activities;
- ii. The expense is supported by sufficient invoices and documents as prescribed by law;
- iii. The expense is supported by non-cash payment documents in cases where the purchase of goods or services and other payments made each time have a value of VND 5 million or more, with non-cash payment documents being made in accordance with the provisions of legal documents on value-added tax, such expense shall be included in deductible expenses when determining taxable income in accordance with regulations.

12 Guidelines on exchange rates for issuing invoices

OL No. 6810/CT-QLNT dated September 14, 2026 issued by the Tax Department providing guidance on the exchange rate for invoice issuance is as follow:

1. For cases where tax and other revenues denominated in foreign currencies are declared as prescribed in Clause 1, Article 14 of Decree No. 252/2026/ND-CP, the currency for tax declaration and payment, other revenues, and the exchange rate used for tax declaration and conversion shall comply with Article 14 of Decree No. 252/2026/ND-CP.
2. In cases where economic and financial transactions arise in foreign currencies in accordance with the law on foreign exchange, the seller shall state on the invoice the foreign currency exchange rate against the Vietnamese Dong in accordance with Point c.1, Clause 8 of the Appendix enclosed with Decree No. 254/2026/ND-CP.

Pursuant to Clauses 1 and 5, Article 26 of the Law on Tax Administration 2025 and the accounting regulations, the exchange rate stated on the invoice shall be the actual transaction exchange rate determined in accordance with the accounting regulations.

13 How to determine and handle interest expense in related-party transactions

OL No. 6487/CT-QLNT dated August 28, 2026 of the Ministry of Finance provides guidance on enterprises' concerns regarding the determination and treatment of interest expenses in related-party transactions as follows:

Decree No. 255/2026/ND-CP dated June 30, 2026 of the Government on tax administration for related-party transactions of enterprises having related-party relationships. Accordingly, the determination of related-party relationships and the application of tax administration regulations on related-party transactions shall be carried out based on the criteria of ownership, control, management and transactions between related parties as prescribed by law, regardless of whether or not the enterprise has an intention of transfer pricing or tax evasion.

13 How to determine and handle interest expense in related-party transactions

Clause 3, Article 16 of Decree No. 255/2026/ND-CP stipulates that the total interest expense incurred during the period, after deducting deposit interest and lending interest, deductible when determining taxable income subject to corporate income tax, shall not exceed 30% of the taxpayer's net profit from business activities during the period plus interest expense after deducting deposit interest and lending interest incurred during the period plus depreciation expenses incurred during the period. The Decree also specifically provides for certain cases where this provision does not apply. In cases where an enterprise has a related-party relationship and engages in related-party transactions, deductible interest expenses when determining expenses for corporate income tax calculation shall be implemented in accordance with Article 16 of Decree No. 255/2026/ND-CP.

Some notable new points regarding the goods trading activities of FDI enterprises

Decree No. 342/2026/ND-CP dated September 3, 2026 issued by the Government introduces several notable changes to the goods trading activities of FDI enterprises as follows:

1. Amendments and supplements to periodic reporting requirements (Article 38)

Under Decree No. 09/2018/ND-CP, FDI enterprises conducting goods trading activities and activities directly related to goods trading were only required to submit an annual periodic report before January 31.

Under Article 38 of Decree No. 342, such enterprises are required to submit two reports on the implementation of goods trading activities and activities directly related to goods trading each year, specifically:

- Annual report: to be submitted before January 15 of the following year;
- First six-month report: to be submitted before July 15 of the reporting year.

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Some notable new points regarding the goods trading activities of FDI enterprises

The report shall be prepared using Form No. 14 issued together with Decree No. 342. Accordingly, Decree No. 342 introduces an additional reporting period and changes the submission deadlines for periodic reports compared with the previous regulations.

2. Addition of the Provincial-level Police to the ENT Council (Articles 22 and 23)

Compared with the composition of the ENT Council prescribed in Article 24 of Decree No. 09/2018/ND-CP, Decree No. 342 adds a representative of the Provincial-level Police to the ENT Council. Accordingly, the ENT Council comprises representatives of the provincial-level People's Committee or an authorized agency, the Department of Industry and Trade, the Department of Finance, the Provincial-level Police, and relevant agencies and organizations.

This addition is consistent with Article 22 of Decree No. 342, under which the ENT criteria also include the conformity of the retail establishment with requirements for ensuring security, public order, social safety, border and island security, and military zones.

Some notable new points regarding the goods trading activities of FDI enterprises

3. Transitional provisions for licenses and submitted dossiers (Article 44)

For dossiers that have been received by the licensing authority before October 18, 2026, such dossiers shall continue to be processed in accordance with Decree No. 09/2018/ND-CP and Article 36 of Decree No. 146/2025/ND-CP.

In cases where a dossier is incomplete or invalid, the enterprise must provide explanations and make supplements as requested by the licensing authority within a maximum period of six months from the date on which the licensing authority issues the request. Upon expiration of this period, the dossier shall be processed in accordance with Decree No. 342.

4. Clarification of the procedural timeline for enterprises becoming FDI enterprises following an M&A transaction (Articles 5 and 36)

Decree No. 09/2018/ND-CP prescribed the obligation to obtain licenses following an M&A transaction but did not clearly specify the applicable deadline.

14 Some notable new points regarding the goods trading activities of FDI enterprises

Under Article 5 of Decree No. 342, where a Vietnamese enterprise operating an existing retail establishment receives capital contribution from, sells shares or capital contributions to, a foreign investor and becomes an FDI enterprise subject to the applicable regulations following the transaction, the enterprise must carry out procedures for obtaining a Business License and a License for Establishment of a Retail Establishment, allowing the existing retail establishment to continue its operations.

Under Article 36 of Decree No. 342, the application dossier for the License for Establishment of a Retail Establishment must be submitted within 30 days from the date on which the foreign investor is confirmed to satisfy the conditions for capital contribution, share purchase, or purchase of capital contribution.

During this period, the enterprise may continue operating at its existing retail establishments until the relevant license is granted, but for a maximum period of 12 months from the date stated in the document or legal document confirming the M&A transaction.

14 Some notable new points regarding the goods trading activities of FDI enterprises

Accordingly, FDI enterprises conducting goods trading activities should update their periodic reporting schedules, review their dossiers in accordance with the new regulations, and verify the nationality and ownership structure of investors to determine the applicability of the ENT. For M&A transactions involving enterprises that already operate retail establishments, enterprises should carry out the procedures for obtaining the Business License and License for Establishment of a Retail Establishment within the prescribed time limit to avoid disruption to their operations.

15 Problems related to business license fees

OL No. 6938/CT-QLNT dated September 18, 2026 of the Tax Department providing guidance on concerns regarding business license tax as follows:

An enterprise that has been notified by the tax authority as not operating at its registered address is responsible for fulfilling its tax obligations during the period in which the enterprise is notified by the tax authority as not operating at its registered address in accordance with Point e, Clause 1, Article 7 of Decree No. 252/2026/ND-CP.

In case the enterprise carries out procedures for termination of the validity of its tax identification number, the enterprise is responsible for completing its obligations as prescribed, including submitting tax declaration dossiers, paying taxes (including tax/business license fee) and handling overpaid tax amounts and value-added tax amounts that have not yet been credited (if any) in accordance with Point d, Clause 1, Article 7 of Decree No. 252/2026/ND-CP and Article 14 of Circular No. 90/2026/TT-BTC.

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Deadline for submitting periodic health check reports for employees in Ho Chi Minh City in 2026

Official document No. 16093/SNV-VLATLĐ of 2026 from the Department of Internal Affairs of Ho Chi Minh City regarding the report on periodic health check-ups for workers in Ho Chi Minh City in 2026 is as follows:

The deadline for completing the organization of periodic health examinations for employees in 2026 in Ho Chi Minh City is before October 31, 2026, and enterprises must update and submit the examination results within 03 days from the date of completion of the health examinations.

Specifically, based on Official Letter No. 16093/SNV-VLATLĐ of 2026, the Department of Home Affairs of Ho Chi Minh City requests companies, corporations, enterprises, and public service units in the City to urgently implement the following:

- **Urgently organize periodic health examinations** for cadres, civil servants, public employees, and employees in accordance with the Law on Occupational Safety and Hygiene 2015; ensure that 100% of cadres, civil servants, public employees, and employees under their management receive periodic health examinations (before October 31, 2026) with all contents included in the health examination package as prescribed by current regulations.

16

Deadline for submitting periodic health check reports for employees in Ho Chi Minh City in 2026

- **Update the health examination results** of employees under the management of the unit via the link provided by the Department of Health immediately after completion of the health examinations, within 03 days, so that the Department of Health can monitor and cross-check them against the health examination data updated on the Community Health Management Platform and serve the purposes of compiling, monitoring, and evaluating the results. (<https://forms.gle/tpxYHkzxqN1GmM4L9>).

Accordingly, the deadline for conducting the 2026 periodic health examinations for employees in Ho Chi Minh City is **October 31, 2026**. Within 03 days after completing the health examinations, enterprises must update the health examination results via the link provided by the Department of Health: <https://forms.gle/tpxYHkzxqN1GmM4L9>.

17 Guidelines for determining the taxable price for special consumption tax (SCT)

OL No. 4941/KHH-QLDN1 dated September 15, 2026 of Khanh Hoa Provincial Tax Department on the taxable price for special consumption tax (SCT) as follows:

- In case the company manufactures and supplies products subject to special consumption tax to customers in the market and applies a trade discount to customers directly on the sales invoice, the taxable price for special consumption tax shall be determined as follows:

Taxable price for special consumption tax = (Selling price exclusive of value-added tax - Environmental protection tax (if any)) / (1 + Special consumption tax rate)

Where the selling price exclusive of value-added tax is the selling price after the trade discount granted to customers in accordance with the provisions of VAT law.

- In case the company applies a trade discount when customers satisfy certain conditions and the company issues an adjustment invoice reducing revenue corresponding to the discount amount granted to customers, the company shall adjust the special consumption tax payable downward correspondingly, calculated on the discount amount granted to customers.



Abbreviations

VAT	Value Added Tax	MOF	Ministry of Finance
PIT	Personal Income Tax	GDT	General Department of Taxation
CIT	Corporate Income Tax		
FCT	Foreign Contractor Tax		
SCT	Special Consumption Tax		
IET	Import and Export Tax		
OTH	Other		
OL	Official Letter		
EPT	Environmental Protection Tax		
SCT	Special Consumption Tax		



September 2026 Newsletter

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KMC's Newsletter aims to update and summarize the general provisions related to Taxation, Accounting, Investment and Labor in Vietnam. You should seek professional advice before making a decision.





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