

# Tax Newsletter

February 2020

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## NEW REGULATIONS

### Decree No. 22/2020/ND-CP on license fees

On February 24, 2020, the Government issued Decree No. 22/2020/ND-CP amending and supplementing a number of articles of Decree No. 139/2016/ND-CP regarding license fees.

Specifically, this Decree supplements the policy of exempting license fees in the first year of establishment for enterprises and the first year of production and business activities for households and individuals. The “first year” of exemption from license fees would be assessed basing on the calendar year (from January 1 to December 31 of the same year), but not the financial year.

Particularly, small and medium-sized enterprises, which are converted from business households, will be exempted from license fees for 3 years, counting from the date they are granted the first business registration certificates.

In case of establishment of a branch, representative office (“RO”), business location in the first year of establishment or in the first

3 years of establishment (for small and medium-sized enterprises), those branches, ROs, and locations are also exempted from license fees for the same period of time as the parent enterprise.

In addition, public kindergartens and schools are also added to those entitled to license fees exemption.

The Decree took effect from February 25, 2020.

### New regulations on tariff quotas for 2020 and tariff quotas under the CPTPP

- **Importation of raw tobacco**

The Ministry of Industry and Trade issued Circular No. 01/2020/TT-BCT dated January 14, 2020 and Circular No. 03/2020/TT-BCT dated January 22, 2020 stipulating tariff quotas for 2020 and tariff quotas under the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (“CPTPP”) for raw tobacco imports.

Accordingly:

- ▶ The quantity of raw tobacco (HS code 2401) imported under the tariff quota in 2020 shall be 59,098 tons.
- ▶ The quantity of import quota of raw material tobacco (HS code 2401) as committed under the CPTPP shall be 525 tons in 2020, incrementing gradually by 25 tons per year up to 975 tons by 2038.

- **Importation of salt and poultry eggs**

On January 22, 2020, the Ministry of Industry and Trade issued Circular No. 02/2020/TT-BCT promulgating the principles of management of salt and poultry eggs imported under tariff quotas in 2020.

Accordingly, the quantity of tariff quota for 2020 regarding poultry eggs and salt shall be 57,940 tons and 110,000 tons, respectively.

- **Importation of used cars**

On January 22, 2020, the Ministry of Industry and Trade issued Circular No. 04/2020/TT-BCT

regulating auction of used car tariff quotas under the CPTPP.

Accordingly, the annual quota of imported used cars under the commitments in the CPTPP will start at 66 units in 2020, then gradually increase by 06 units per year up to 150 units by the year 2034.

Used car import quotas shall be allocated on the basis of auction in compliance with the Law on Auction. When carrying out the procedures for importing used cars within the tariff quotas, apart from conducting the import procedures in compliance with current regulations, the winning trader shall present to the Customs the document of the Ministry of Industry and Trade announcing allocation of the rights to use import quotas for the used cars.

In addition, used cars imported under the quotas are required to satisfy the rules of origin of goods under the CPTPP and the prevailing regulations on technical standards, quality, technical safety and environment protection standards applicable to cars.



## NEW RULINGS

### Corporate Income Tax (“CIT”)

Loans from the individual who is a member of the Members’ Council shall be considered as related party transactions

On February 20, 2020, Hanoi Tax Department issued Official Letter No. 6684/CT-TTHT regarding the related party transactions. Specifically, if the enterprise borrows from the individual who is a member of the Members’ Council and involves in the enterprise’s operation (including interest-free loans), the enterprise will be considered engaged in a related party transaction as prescribed at Article 4 of Decree No. 20/2017/ND-CP. Accordingly, the Company is required to calculate the deductible interest expenses from loans for the purpose of CIT finalization in accordance with Clause 3 of Article 8 of Decree No. 20/2017/ND-CP.

Differences arisen from real-estates revaluation shall be excluded from deductible expenses

On January 15, 2020, Hanoi Tax

Department issued Official Letter No. 1971/CT-TTHT guiding about the deductibility of the differences arising from the revaluation of the estate.

The enterprise purchased a property for commercial purposes (e.g. land and property use rights and ownership), at the year-end, if the value of such property devaluates and the devaluated amount is not subject to provisions as prescribed under Clause 1, Article 1, Circular No. 48/2019/TT-BTC, the Company is not allowed to make provision for the devaluation and treats it as deductible for CIT finalization purpose.



## Personal Income Tax ("PIT")

### Guidance on the 2019 PIT finalization

On February 18, 2020, Hanoi Tax Department issued Official Letter No. 6043/CT-TTHT on the 2019 PIT finalization and tax code issuance for dependents.

Regarding 2019 PIT finalization, there are some notable points as below:

- Deadline for the submission of 2019 PIT finalization: March 30, 2020.
- Start time of PIT obligation of expatriates:

For foreigners who are Vietnam tax residents, the Vietnam PIT obligations start from the first arrival date to Vietnam for working purposes and having income as mentioned in the labor contract or the assignment letter.

- Registration for the dependents having average monthly income of VND 01 million or less.

In case taxpayers proceed dependent registration for dependents who do not have income or have an average monthly income from all sources during the year of VND 01 million or less, the taxpayers have to undertake and take responsibility for the accuracy of dependent registration information.

- Encouragement of submitting the hard copy of the PIT finalization return submission by via post service: Hanoi Tax Department recommends using post services in case taxpayers submit hard copies of the PIT finalization for time and cost effectiveness, and to prevent the infection of the Severe Acute Respiratory Syndromes caused by corona virus. The taxpayers are advised to provide sufficient contact information (i.e. fullname, address, telephone number, email address) for the Tax authority's ease of contact when additional documents are needed.



## Dependent registration for sibling, niece/nephew, aunt/uncle, grandparents

On February 20, 2020, Hanoi Tax Department issued Official Letter No. 6686/CT-TTHT guiding on dependent registration. Accordingly, in case the taxpayer would like to register dependent deduction for his/her direct sibling, niece/nephew, aunt/uncle, grandparents, who have nobody else to take care of and the taxpayer is directly nurturing, such dependent has to satisfy the conditions as regulated in Point d, Clause 1, Article 9 of Circular No. 111/2013/TT-BTC.

If the taxpayer's direct siblings, niece/nephew, aunt/uncle, grandparents are not the ones having nobody else to take care of, they would not be qualified for dependent relief when computing the deduction for PIT purposes.

## Withholding of 10% PIT on the incomes paid after the termination of employment contract

On January 21, 2020, Hanoi Tax Department issued Official Letter No. 3342/CT-TTHT guiding on PIT. Specifically, regarding incomes of an employee which is beyond

those regulated in Labor Codes, Law on Social Insurance, and the employment contract with the enterprise, and paid after the termination of such employment contract, if the payment is from VND 2 million and more, the enterprise is obliged to withhold 10% of PIT on the total incomes.

## Electronic invoice ("E-invoice")

### The minutes of invoice adjustment must be made in writing if the buyer cannot provide e-signature

On February 24, 2020, Hanoi Tax Department issued Official Letter No. 7639/CT-TTHT regulating the minute of invoice withdrawal. Accordingly, in case there is any errors in the e-invoice, which has been made and sent to the buyer, the treatment shall follow the guidance at Article 9 of Circular No. 32/2011/TT-BTC (i.e. the seller and the buyer must make a written agreement specifying the errors then both electronically sign on it). In case the buyer does not have an electronic signature, the seller and the buyer shall make a written agreement clearly stating the mistakes then both sign on it.

## General provisions on the use of e-invoices

On February 19, 2020, Hanoi Tax Department issued Official Letter No. 6276/CT-TTHT guiding the use of e-invoices.

Specifically, based on Decree No. 119/2018/ND-CP of the Government, which took effect from November 01, 2018, and Circular No. 68/2019/TT-BTC, which took effect from November 14, 2019, from November 1, 2018 to October 31, 2020, if the Tax authority still does not notify and request to convert to e-invoices as prescribed in Decree No. 119/2018/ND-CP and under the guidance of Circular No. 68/2019/TT-BTC, the bank shall still use invoices in accordance with Decree No. 51/2010/ND-CP and Decree No. 04/2014/ND-CP and other documents guiding the implementation of Decree No. 51/2010/ND-CP and Decree No. 04/2014/ND-CP.

In case of applying e-invoices in accordance with Decree No. 51/2010/ND-CP, Circular No. 39/2014/TT-BTC, Circular No. 32/2011/TT-BTC, the timing for issuing e-invoices when selling goods and services shall be in accordance with Clause 2, Article

16 of Circular No. 39/2014/TT-BTC.

In case an enterprise provides services for VND 200,000 or more, if the buyer does not provide his/her name, address and tax identification number (if any), the company must still issue an invoice that clearly states "the buyer does not provide his/her name and address/tax code", in accordance with Clause 7, Article 3 of Circular No. 26/2015/TT-BTC.

## Regulations on making invoices for enterprises applying e-invoices

On January 21, 2020, the General Department of Taxation issued Official Letter No. 326/TCT-CS guiding the make of e-invoices.

In case an enterprise initiates, issues and uses e-invoices for selling goods and services in accordance with Circular No. 32/2011/TT-BTC, in addition to the specific guidance of Circular No. 32/2011/TT-BTC, other contents must be in accordance with Decree No. 51/2010/ND-CP and Circular No. 39/2014/TT-BTC.

Therefore, if the enterprise applies a trade discount to its customers, it will make an e-invoice according to the guidance at Point 2.5 of

Appendix 4 attached to Circular No. 39/2014/TT-BTC dated March 31, 2014 of the Ministry of Finance.

## Value Added Tax ("VAT")

### Export Processing Enterprises ("EPEs") are not entitled to VAT refund for investment projects

On February 21, 2020, the General Department of Taxation issued Official Letter No. 774/TCT-KK guiding the VAT refund for investment projects.

Specifically, the provisions on VAT refund for investment projects at Clause 3 of Article 1 of Circular No. 130/2016/TT-BTC shall only apply to enterprises that declare and pay VAT by the deduction method, and not applicable to EPEs. Accordingly, EPEs are not eligible for the input VAT refund of investment projects as prescribed in Clause 3, Article 1 of Circular No. 130/2016/TT-BTC above.

### VAT on propaganda news articles

On February 20, 2020, Hanoi Tax Department issued Official Letter No. 6683/CT-TTHT guiding the make of VAT invoices when writing

propaganda news articles for publication in newspapers.

Specifically, in case the newspaper's editorial office signs a contract for writing propaganda articles on certain specialized topics (i.e. combating smuggling, trade frauds and fake goods, etc.) for publishment, the services are not subject to VAT in accordance with Point 4 of Circular No. 219/2013/TT-BTC.

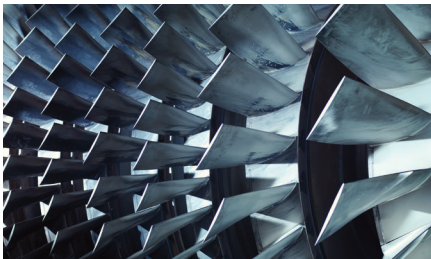
### Applying the VAT rate of 0% to accounting and tax services provided to EPEs

On February 20, 2020, Hanoi Tax Department issued Official Letter No. 6806/CT-TTHT on VAT rates for accounting and tax consulting services for EPEs. Accordingly, accounting and tax consulting services for EPEs that perform export production and commercial business activities in accordance with the provisions of laws, if the services are provided and consumed in the tax-free zone and meet the conditions specified at Point b of Clause 2 of Article 9, and not one of the cases specified at Clause 2 of Article 1 of Circular No. 130/2016/TT-BTC, the applicable VAT rate shall be 0%.

## Declaring VAT for hydroelectricity generation activities

On February 13, 2020, the General Department of Taxation issued Official Letter No. 570/TCT-KK guiding the VAT declaration for hydropower production activities. Specifically:

- In case the Company assigns its branch to manage, operate and directly sell electricity, generating revenue from the sale of electricity from the plant, the branch shall make VAT invoices, declare and pay VAT for the activity.
- In case the Company assigns the branch to manage and operate the plant, does not directly sell electricity and thus not generate revenue from the sales, the Company shall make VAT invoices and declare VAT for hydroelectricity generation activities of the plant.



## Foreign Contractor Withholding Tax ("FCWT")

### FCWT for royalty is creditable and deductible

On February 24, 2020, Ho Chi Minh City Tax Department issued Official Letter No. 7634/CT-TTHT providing guidance on royalty fee of trademark license agreement.

Accordingly, in case an enterprise signs a trademark license agreement and pays a royalty fee, the enterprise shall withhold and pay FCWT on behalf of the foreign contractor as regulated under the guidance in Official Letter No. 15888/BTC-CST issued by the Ministry of Finance on November 7, 2016.

Tax creditation and treatment related to the payment shall be processed as follow:

- Expenses in relation to the use of trademark shall be deductible if they fully meet the conditions specified at Article 4 of Circular No. 96/2015/TT-BTC.
- CIT payment on behalf of foreign contractor shall be deductible if the royalty is the net amount and regulated in the agreement (Clause 2.37,

Article 4, Circular No. 96/2015/TT-BTC).

- VAT payment on behalf of foreign contractor shall be creditable in accordance with Article 14, Article 15, Circular No. 219/2013/TT-BTC.

## FCWT declaration for the foreign provider who is an individual

On January 21, 2020, Hanoi Tax Department issued Official Letter No. 3353/CT-TTHT providing guidance on FCWT declaration for foreign service provider who is an individual. Accordingly:

A foreign individual who has registered his/her business in accordance with foreign laws or possesses documents proving his/her legislative status of providing a service recognized by a foreign country (the supporting documents used in Vietnam must be consular legalized as prescribed by law) shall be regarded as a business individual. Income from providing consulting service of such business individual is subject to FCWT as income from business activities.

The Vietnamese enterprise that purchases services from such

individuals is obliged to withhold, declare, and pay VAT and PIT on behalf of the individual using form No. 01/CNKD of Circular No. 92/2015/TT-BTC issued on June 15, 2015 by the Ministry of Finance.

## Customs, Import and Export duty

### Strengthening inspection and control of goods subject to customs supervision

On February 11, 2020, the General Department of Customs ("GDC") issued Official Letter No. 754/TCHQ-GSQL on strengthening the inspections, controls and supervisions of goods which are subject to customs supervision.

Specifically, the Customs authorities will strengthen the implementation of inspection and control procedures for goods subject to supervision by way of propaganda, supervision enhancements at the border gates, preparation of special plans and strengthening of control in areas that they are in charge.

Those means of transportation showing abnormal signs (such as



bolt positions, joints, container door hinges, seals, etc.) are required to meet customs supervision requirements as follows:

- For containers: no tearing, puncturing; the lock and latches must have seal pin; container hinges and ears must comply with the standards prescribed in Circular No. 64/2015/TT-BTC of November 5, 2015.
- For vans: no puncture or tear in cargo containers; the lock and latches must have seal pin.

In case of failure to meet the above conditions, those means of transportation are not allowed to load goods, and not eligible to go through the customs supervision area.



## No penalty for administrative violations when declaring the wrong HS code for the first time making import-export documentation

On February 20, 2020, the GDC issued Official Letter No. 974/TCHQ-PC on exemption of administrative sanctions for incorrect declaration of HS codes for the first time of import and export clearance for goods.

Specifically, pursuant to Clause 6 of Article 5 of Decree No. 127/2013/ND-CP dated October 15, 2013 and Clause 5 of Article 4 of Circular No. 155/2016/TT-BTC dated October 20, 2016, enterprises are exempted from administrative penalties on incorrect declaration of HS codes *"for the first time of export or import clearance of such goods, where the names of the exported or imported goods are correctly declared under regulations on customs declaration but HS Code are incorrectly declared according to the List of Vietnam's exports and imports; duty tariff are incorrectly declared for such goods according to the Export and Import Tariff prevailing at the time of customs declaration"*, and not the first time of import and export under a contract/order.

Accordingly, in case enterprises have never conducted customs declaration for import and export of goods, they would be exempted from penalties if they declare HS codes incorrectly for the first time of declaration. In case the enterprise has conducted customs declaration for export and import of such goods before, penalties shall apply for incorrect HS code declaration, even if it is the first time of declaration under a contract.

## The fee for the trademark usage shall be added to the customs value

On February 18, 2020, the GDC issued Official Letter No. 938/TCHQ-TXNK on royalty fees and equipment rental fees.

Accordingly, pursuant to Clause 8 of Article 1 of Circular No. 39/2015/TT-BTC amended by Circular No. 60/2019/TT-BTC, royalties for use of trademark shall be added to the customs dutiable value if all 3 of the following conditions are met:

- The royalty is not included in the actual price paid or to be paid to the seller;

- The use right of the trademark is related to the imported goods;
- The payment for trademark use is a condition of the purchase of the imported goods.

Enterprise that imports raw materials and supplies and then outsources the processing activities then exports shall not be exempted from import duty

On January 16, 2020, the GDC issued Official Letter No. 395/TCHQ-TXNK on the goods imported for production of exported goods.

Accordingly, the Law on Export and Import Tax No. 107/2016/QH13, and Decree No. 134/2016/ND-CP do not stipulate tax exemption for cases where enterprises import raw materials and supplies for export processing but outsources some stage of the manufacturing process to other companies.

Therefore, an enterprise that imports raw materials and supplies for manufacturing of exported goods, but then outsources the processing/producing of some stages to other companies, shall

not be exempted from import duty for the imported materials and supplies.

## Tax policy for goods imported for export processing purposes

On February 14, 2020, the GDC issued Official Letter No. 858/TCHQ-TXNK providing tax policies on goods imported for export manufacturing activity.

Accordingly, in case an enterprise imports goods for export manufacturing but does not conduct the manufacturing activities, instead assigns part or all of imported goods to another enterprise for processing one stage or more, and then receives back the goods for export, the former enterprise is not eligible for import duty exemption for the imported raw materials for export manufacturing under Clause 2, Article 12 of Decree No. 134/2016/ND-CP.

In case an enterprise rents facilities, machinery and equipment from another enterprise, and has the right to use machinery and equipment at the production premise that is suitable to use the imported raw materials and

supplies to produce the exported goods, and conduct the production facility notification in line with the laws and regulations on Customs, the former enterprise shall be exempted from import duty for the imported goods and supplies according to Article 12 of Decree No. 134/2016/ND-CP.

In case an enterprise imports raw materials and supplies for processing under processing contracts with foreign traders, then hires other organizations or individuals in Vietnam for processing, if the conditions for exempted goods are satisfied according to Clause 2, Article 10, Decree No. 134/2016/ND-CP, the enterprise shall be exempted from import duty for the imported goods and supplies.



## Basis for declaration of insurance for imported goods

On January 21, 2020, the GDC issued Official Letter No. 487/TCHQ-TXNK on the declaration of insurance for imported goods.

Accordingly, at Clause 2 of Article 13, Circular No. 39/2015/TT-BTC stipulates that the insurance premiums for goods arriving at the first import border gate shall be added to the dutiable value of imported goods if the conditions specified in Clause 1 of the same Article are met.

In case the imported goods are insured by a principle insurance contract (the insurance policy shows that the premium is calculated based on a percentage on the total value of the goods) and the enterprise cannot obtain invoices for insurance premium at the time of customs declaration, the enterprise can present the insurance contract as a basis for declaring the insurance premium on the customs declaration, provided that the premium amount is objective and quantifiable, and in line with the insurance invoice when being issued by the Insurance Company.

## Provisions on documents proving that goods are intact during transportation under the CPTPP

On February 11, 2020, the GDC issued Official Letter No. 758/TCHQ-GSQL providing guidance on the documents on transportation under the CPTPP.

Accordingly, if goods are transported through one or more countries which are not party(ies) to the CPTPP without being stored in the territory of such country(ies), the presentation of transportation documents is required to prove that the goods remain intact during transportation.

If goods are transported through one or more countries which are not party(ies) to the CPTPP and stored in the territory of such country(ies), the presentation of warehousing or customs documentation is required to prove that the goods remain intact during transportation.



## Priority shall not be applicable to branches of customs service agency

On February 12, 2020, the GDC issued Official Letter No. 787/TCHQ-GSQL providing guidance on the conditions for application of priority regime.

Accordingly, Article 45 of the Enterprise Law 2014 stipulates that *“a branch is a dependent unit of the enterprise, which is responsible for performing all or a part of the*

*functions of the enterprise, including the function of acting as an authorized representative. The business activities of a branch must be consistent with the registered business lines of the enterprise”.*

Therefore, a branch is a dependent unit of an enterprise, has no legal status, and cannot independently participate in legal transactions. Accordingly, the branch does not have sufficient basis to be considered for the application of priority regime.



## Contacts

### Thomas McClelland

#### National Tax Leader

Tel: +84 28 7101 4333  
tmcclelland@deloitte.com

### Bui Ngoc Tuan

#### Tax Partner

Tel: +84 24 7105 0021  
tbui@deloitte.com

### Bui Tuan Minh

#### Tax Partner

Tel: +84 24 7105 0022  
mbui@deloitte.com

### Phan Vu Hoang

#### Tax Partner

Tel: +84 28 7101 4345  
hoangphan@deloitte.com

### Dinh Mai Hanh

#### Tax Partner

Tel: +84 24 7105 0050  
handinh@deloitte.com

### Suresh G Kumar

#### Tax Partner

Tel: +84 28 7101 4400  
ksuresh@deloitte.com

### Vo Hiep Van An

#### Tax Partner

Tel: +84 28 7101 4444  
avo@deloitte.com

### Vu Thi Thu Nga

#### Tax Partner

Tel: +84 24 7105 0023  
ngavu@deloitte.com

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### Hanoi

15<sup>th</sup> Floor, Vinaconex Tower,  
34 Lang Ha Street, Dong Da District,  
Hanoi, Vietnam  
Tel: +84 24 7105 0000  
Fax: +84 24 6288 5678

### Ho Chi Minh City

18<sup>th</sup> Floor, Times Square Building,  
57-69F Dong Khoi Street, District 1,  
Ho Chi Minh City, Vietnam  
Tel: +84 28 7101 4555  
Fax: +84 28 3910 0750

Website: [www.deloitte.com/vn](http://www.deloitte.com/vn)

Email: [deloittevietnam@deloitte.com](mailto:deloittevietnam@deloitte.com)

Facebook: <https://www.facebook.com/Deloitte-Vietnam-543428879350392/?ref=bookmarks>





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