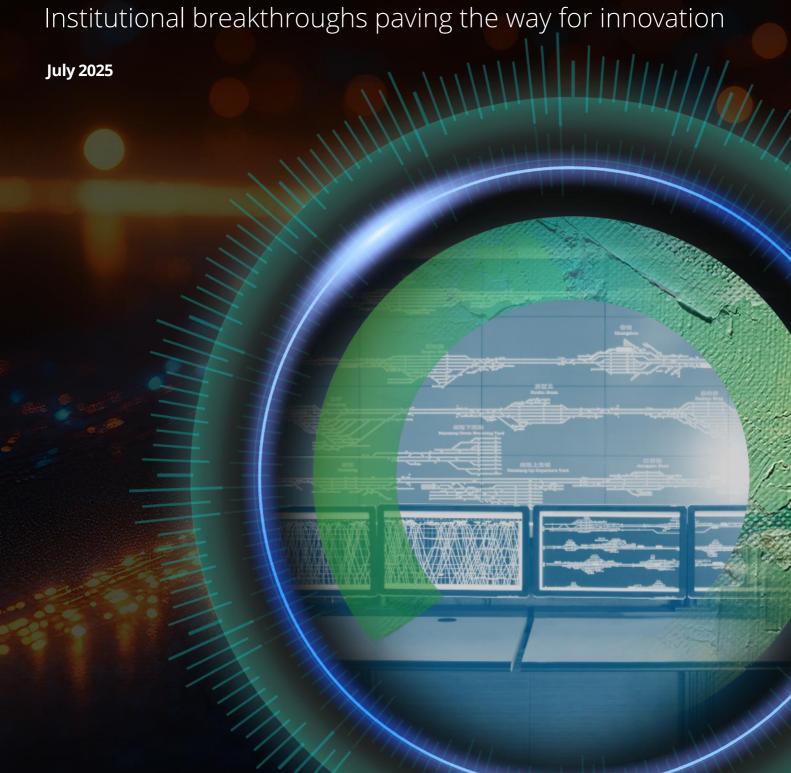
Deloitte.

Industry Insights

Episode 02.

Law on Science, Technology (amended) and Innovation No. 93/2025/QH15:



Overview of the Law and expert viewpoints

Context

On 27 June 2025, Vietnam's Law on Science, Technology (amended) and Innovation no. 93/2025/QH15 ("Law on ST&I") was officially passed during the 9th session of the 15th National Assembly. The law generally will take effect as from 01 October 2025; however, certain provisions relating to the budget and financial policies for ST&I came into effect as from 01 July 2025.

Vietnam's Government has committed to refining the Vietnamese legislation to align with market dynamics and international best practices, as part of a continuing transition towards a growth model driven by ST&I to enhance productivity, quality, efficiency, and competitiveness. Building on the 2013 Law on Science and Technology ("S&T"), the Ministry of S&T has drafted the Law on ST&I, establishing a comprehensive legal framework that incorporates directives by the Party and the Government, and supports Vietnam's scientific and technological development landscape.

Below is Deloitte's Alert, providing update on key provisions of the Law on ST&I.



Deloitte's viewpoints and recommendations

Viewpoint

The Law on ST&I represents a key institutional advance, expanding the legal framework in a more comprehensive, flexible, and open direction. It confirms the government's strategic commitment to position businesses at the center of the innovation ecosystem. By introducing a sandbox and controlled risk-taking mechanism, the law aims to stimulate innovation. At the same time several policies are introduced to promote scientific research and technology development, foster commercialization of the scientific research outcome, and facilitate technology transfer.

This represents an excellent opportunity for businesses engaged in science and technology, R&D, and innovation activities to access new policies covering incentives and support mechanisms, financial support, technical infrastructure, and workforce development.

Recommendations



Review and assess incentives opportunities

Enterprises operating in ST&I should proactively review and assess their qualification as incentive beneficiaries (e.g. science & technology enterprise, project implementing and developing strategic technologies as promulgated in the Government's list).

Integrate technological research and development ("R&D") with long-term investment planning

Leveraging the available R&D support, sandbox and commercialization mechanisms, enterprises might be able to develop strategic, forwardlooking investment plans to maximize policy incentives and market opportunities.

Stay updated with regulations and relevant policies

Continue monitoring further regulations providing guidance for the Law. At the same time, stay informed of other related policies promoting ST&I (for example, Resolution No. 198/2025/QH15 on special mechanisms and policies for private sector development, with a focus on innovation activities).

Strategic investment priorities: Incentives – Infrastructure – Workforce



Promoting scientific research, technology development and innovation

		Science and Technology Enterprise ("STE")	Strategic technology development ⁽¹⁾	Scientific research, technology development and innovation
	Incentives & support (Law on ST&I)	 Priority for land lease and infrastructure access in high-tech zones, centralized digital technology zones, etc.; Priority use of R&D equipment; Information, communications and trade promotion support. 	 Access to infrastructure in industrial zones and high-tech zones, facilities for experimentation and research; Expats working in Vietnam for less than 03 months are not required to provide documents verifying the purpose of entry when applying for a visa. 	 Access to facilities, technical infrastructure and equipment for research; Support for workforce training and attraction; Support for research, training activities, etc.; Funding for scientific research, technology development and innovation are treated as deductible expenses for Corporate Income Tax ("CIT") purposes; R&D expenses are deductible at a certain percentage of actual expenses for CIT purposes.
	CIT incentives	• 15 years of 10% tax rate;	• 15 years of 10% tax rate;	
	(Law on CIT No. 67/2025/QH 15)	• 04 years of tax exemption followed by 09 years of 50% tax reduction.	• 04 years of tax exemption followed by 09 years of 50% tax reduction.	
	Import Duty and customs procedure support	05 years of Import Duty exemption for raw materials, supplies and components imported for production and	 Privileged customs procedures; Waived from 02 conditions required for applying privileged 	 Imported machinery, equipment, spare parts, specialized materials and scientific publications directly serving ST&I purpose;

support

(Law No. 90/2025/QH 15, amending 8 Laws including the Law on Customs and Law on Export-Import Duties)

- applying privileged customs procedures compared to regular enterprises (specifically: exemption from import-export turnover and requirement for compliance with customs and tax laws for 02 consecutive years).
- Goods imported to create fixed assets for new or expansion projects for ST&I development;
- Raw materials, supplies and components imported by innovation centers for up to **05 years** from the commencement of research activities;
- Raw materials, supplies and components imported by R&D centers for pilot production and testing.

(1) "Strategic technology" and "strategic technological product" are defined into the Law on High-Technology No. 21/2008/QH12 and are specified in the List under Decision No. 1131/QD-TTg dated 12 June 2025.



Strategic investment priorities: Incentives – Infrastructure – Workforce (cont.)



Establishment of Support and Investment Funds

- National science and technology development fund
 - ✓ Sponsor and commission ST&I programs and tasks;
 - ✓ Sponsor activities to strengthen national S&T capability.
 - ST&I development fund on Ministry and Provincial level
 - ✓ Sponsor and commission ST&I programs and tasks;
 - ✓ Support with loan interest, grants for technology application, transfer and innovation;
 - ✓ Support the development of innovation.

- 3 National and provincial venture capital funds
 - ✓ Investment in innovative start-up and other funds for innovative start-ups;
 - ✓ Support the innovative start-up ecosystem
- 4 National technology innovation fund
 - ✓ Sponsor and commission ST&I programs and tasks:
 - ✓ Support with loan interest, grants for technology application, transfer and innovation;
 - ✓ Support the development of innovation systems and the innovative start-up ecosystem.



Infrastructure for ST&I

Infrastructure serving scientific research, technology development and innovation

- ✓ Invest in the development of facilities, technical infrastructure, equipment for common use;
- ✓ Promote the development of R&D, innovation zones/ clusters, including High-tech Zones, scientific parks, and innovation clusters.

Information and statistics infrastructure for ST&I

- ✓ Develop a national digital platform for ST&I management;
- ✓ Establish a national information system for ST&I.

Strategic investment priorities: Incentives – Infrastructure – Workforce (cont.)



Workforce development for ST&I

For individuals engaged in ST&I activities

- Priority treatment in appointment, recruitment, job placement, income, Personal Income Tax ("PIT"), labor, housing, immigration, residence, and work permit application;
- For Vietnamese experts and scientists overseas, foreign experts and scientists in Vietnam:
 - ✓ Incentives on income;
 - ✓ Favorable conditions for working, immigration, residence, housing, and other incentives as prescribed by law.
- Specific support mechanisms are available for each specific category of individuals (talents, researchers, scientists, etc.).

For ST&I talents

- Financial and non-financial incentives:
- Favorable conditions for working, housing arrangements, opportunities for long-term career development, social security support for talents and their families.

(*) ST&I talents are individuals with exceptional capabilities, breakthrough contributions, or significant influence on the development of the sector at the national or international level, meeting at least one of the prescribed criteria (such as receiving science & technology related awards, being assigned to lead national key projects, etc.).

PIT incentives

The following types of income are supplemented as **non-taxable income**:

- Employment income from ST&I tasks;
- Income from copyright related to ST&I tasks upon commercialization;
- Income of individual investors, experts working for innovative start-up projects, founders of innovative startups, and individual investors contributing to venture capital funds.

Sandbox mechanism

Sandbox mechanism is a regime under which an organization or enterprise is authorized to conduct trials of **new** technologies, processes, solutions, products, services or business models that are not yet governed by existing law or that deviate from prevailing regulations.



General principles

Feature	Requirements	
Sandbox scope	Objectives;	
	Eligible participants;	
	 Conditions and criteria for new technologies, processes, solutions, products, services and business models; 	
	Competent authority granting the permit for implementation;	
	Principles for revaluation of enterprises' application to participate;	
	 Procedures for sandbox approval, adjustment, extension, suspension and termination; 	
	Duration, location and scope;	
	Control measures: monitoring, periodic reporting, collection of participant's feedback and evaluation methods;	
	Rights and responsibilities of relevant authorities, organizations, enterprises and individuals;	
	Measures to protect participant's rights and benefits.	
Duration	Based on the organization or enterprise's proposal;	
	• No more than 03 years and can be extended once for up to an additional 03 years.	
Management measures	Subject to interim review and a final evaluation;	
	The competent authority shall examine the results and decide either to continue the sandbox or to promulgate formal legislation for official adoption.	

Sandbox mechanism (cont.)

Responsibility waiver

- ✓ During the sandbox implementation, competent authorities and relevant organizations, enterprises and individuals, based on certain principles, shall be waived from relevant liabilities in the event of any damage or risk arising;
- ✓ Including administrative, civil and criminal liabilities.



Participant protection

The organization or enterprise granted permission to conduct sandbox must ensure participant protection, including:

- ✓ Risk disclosure;
- Implementation of data-management protocol;
- Periodic risk assessments;
- Complaints handling, damages compensation, etc.

Promotion of technology commercialization & transfer



Commercialization of ST&I research outcomes

- 1. Owner of the scientific research, technology development and innovation outcomes are entitled to decide on their commercialization;
- 2. Organizations authorized to manage and make use of these outcomes are entitled to determine the form, approach, pricing, and profit-sharing from commercialization;
- 3. Forms of commercialization include: leases, sales, transfers, licensing; service provision; cooperation, joint ventures, partnerships, establishment of enterprises; and self-exploitation and use;
- Distribution of profit from commercialization:
 - In cases where state budget is not used during commercialization: the owner may determine the profit sharing;
 - In cases where state budget is used during commercialization: the after-tax profits shall be distributed as follows:
 - ✓ A minimum of 30% as a reward to the authors of the ST&I tasks outcomes;
 - ✓ Rewards for individuals directly contributing to commercialization activities;
 - ✓ Reinvestment into ST&I activities;
 - ✓ Other purposes.
 - If ST&I tasks funded by the state budget are inventions, layout designs, industrial designs, or plant varieties protected under the Law on Intellectual Property, the author, in addition to the above-mentioned rights, shall also be entitled to other benefits in accordance with the Law on Intellectual Property.



Promotion of technology commercialization & transfer (cont.)



Technology appraisal and transfer

- 1. Supplement the mechanism for technology appraisal when the organizations or individuals seek for appraisal of self-developed technologies for implementation in production and business activities;
- 2. Expand the categories of subjects eligible to tax incentives under tax laws in technology transfer activities, including:
 - Organizations and individuals receiving technology transferred from overseas into Vietnam;
 - Organizations and individuals conducting innovation activities within enterprises.
- 3. Transfer of ST&I outcomes funded by the state budget to foreign organizations or individuals:
 - Must comply with the regulations on technology transfer;
 - In cases where the outcomes fall under the List of high technologies prioritized for investment and development in accordance with the Law on High Technology, it must be publicly disclosed on the national digital platform for ST&I management, and priority access must be given to domestic organizations and individuals for a minimum period of 12 months prior to transfer to a foreign entity.

Contact us



Bui Tuan MinhCountry Tax & Legal Leader
+84 24 7105 0022
mbui@deloitte.com



Bui Ngoc TuanTax Partner
+84 24 7105 0021
tbui@deloitte.com



Dinh Mai Hanh
Tax Partner
+84 24 7105 0050
handinh@deloitte.com



Vu Thu Nga Tax Partner +84 24 7105 0023 ngavu@deloitte.com



Vu Thu HaTax Partner
+84 24 710 50024
hatvu@deloitte.com



Pham Quynh Ngoc Legal Partner +84 24 710 50070 ngocpham@deloitte.com



Thomas McClelland
Tax Partner
+84 28 7101 4333
tmcclelland@deloitte.com



Phan Vu Hoang
Tax Partner
+84 28 7101 4345
hoangphan@deloitte.com



Vo Hiep Van An Tax Partner +84 28 7101 4444 avo@deloitte.com



Tat Hong Quan
Tax Partner
+84 28 7101 4341
quantat@deloitte.com



Dang Mai Kim Ngan Tax Partner +84 28 710 14351 ngandang@deloitte.com



Tran Quoc Thang
Tax Partner
+84 28 710 14323
qthang@deloitte.com



Vu Minh Ngoc Tax Partner +84 28 7101 4645 ngocmvu@deloitte.com



Office

Hanoi Office

15th Floor, Vinaconex Building, 34 Lang Ha Street, Lang Ward, Hanoi, Vietnam

Tel: +84 24 7105 0000 Fax: +84 24 6288 5678

Ho Chi Minh City Office

18th Floor, Times Square Building, 57-69F Dong Khoi Street, Sai Gon Ward, Ho Chi Minh City, Vietnam

Tel: +84 28 7101 4555 Fax: +84 28 3910 0750

Deloitte.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

About Deloitte Vietnam

In Vietnam, services are provided by separate and independent legal entities, each of which may be referred to or known as Deloitte Vietnam.

This communication contains general information only, and none of DTTL, its global network of member firms or their related entities is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication.

© 2025 Deloitte Vietnam Tax Advisory Company Limited Designed by CoRe Creative Services. RITM2046082