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## NEWSLETTER IN MARCH 2026

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01

## Guidance on the contribution rates for compulsory insurances effective from 01/01/2026

*Official Letter No. 64/TB-BHXH dated 07/01/2026 issued by Ho Chi Minh City Social Insurance*

### 1. Regional minimum wage

Region	Minimum Monthly Salary (VND/month)	Minimum Hourly Wage (VND/hour)
Region I	5,310,000	25,500
Region II	4,730,000	22,700
Region III	4,140,000	20,000
Region IV	3,700,000	17,800

*(The list of areas of region I, region II, region III, and region IV is specified in the Appendix issued with Decree No. 293/2025/ND-CP)*

Accordingly, from 01/01/2026, the **unemployment insurance (UI)** contribution base will be calculated based on the new regional minimum wages, with the maximum salary subject to UI contributions increased to 20 times the minimum wage of Region I **(VND 106,200,000/month)**.

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01

## Guidance on the contribution rates for compulsory insurances effective from 01/01/2026

*Official Letter No. 64/TB-BHXH dated 07/01/2026 issued by Ho Chi Minh City Social Insurance*

**2. The Social Insurance authority will automatically adjust** the maximum salary for participation in social insurance (SI), health insurance (HI), unemployment insurance (UI), and occupational accident and disease insurance (OA-DI) for participants whose salary and salary allowances have been correctly declared in the labor contracts; no dossier submission is required from the unit. In cases where the unit has not correctly declared the salary and salary allowances stated in the labor contracts, the unit is requested to prepare and submit a dossier to adjust the salary for SI, HI, UI, and OA-DI contributions in accordance with regulations.

No later than 25/01/2026, for units that have not submitted dossiers to adjust the minimum salary in accordance with Decree No. 293/2025/NĐ-CP, the Social Insurance authority will temporarily adjust the minimum salary for SI, HI, UI, and OA-DI contributions to the minimum wage stipulated in Decree No. 293/2025/NĐ-CP until the adjustment dossier from the unit is received.

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02

## The application of non-cash payment documents when paying salaries and wages to employees.

*Official Letter No. 218/CST-TN dated 27 January 2026 issued by the Department of Tax Policy Management and Supervision, Fees and Charges – Ministry of Finance*

According to the Official Letter, the Department of Tax Policy Management and Supervision, Fees and Charges provides guidance that for **salary and wage payments of VND 5 million** or more per payment made to employees from the effective date of Decree No. 320/2025/ND-CP (15 December 2025) **in order to be treated as deductible expenses for corporate income tax (CIT) purposes, enterprises must have non-cash payment supporting documents.**

Non-cash payment documents are determined in accordance with Article 26 of Decree No. 181/2025/ND-CP dated 1 July 2025.

This guidance is based on Clause 1, Article 9 and Clause 8a, Article 10 of Decree No. 320/2025/ND-CP.

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03

## The application of preferential corporate income tax rates according to Decree 320/2025/ND-CP

Official Letter No. 850/DAN-QLDN2 dated 27 February 2026- Da Nang Tax Department

The Da Nang Tax Department has recently issued Official Letter No. 850/DAN-QLDN2, providing guidance on the application of tax rate incentive of corporate income tax (“CIT”) under Decree No. 320/2025/ND-CP.

According to the Official Letter, where an enterprise established in Vietnam operates as a subsidiary, including wholly foreign-owned enterprises, it would not qualify for the application of the preferential CIT rates of 15% and 17% as prescribed under Clauses 2 and 3, Article 11 of Decree No. 320/2025/ND-CP.

The Da Nang Tax Department refers to Clause 1, Article 195 of the Law on Enterprises No. 59/2020/QH14 dated 17 June 2020 and Clauses 2, 3 and 4, Article 11 of Decree No. 320/2025/ND-CP dated 15 December 2025 of the Government:

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03

## The application of preferential corporate income tax rates according to Decree 320/2025/ND-CP

Official Letter No. 850/DAN-QLDN2 dated 27 February 2026- Da Nang Tax Department

### **Article 195. Parent company and subsidiary**

*A company shall be considered a parent company of another company if it falls under one of the following cases:*

*(a) Holding more than 50% of the charter capital or the total number of ordinary shares of such company;*

...

### **Article 11. Tax rates**

...

*(c) The 15% and 17% tax rates stipulated under this Article shall not apply to enterprises established in accordance with Vietnamese law that are subsidiaries or enterprises having related-party relationships, where the related parties do not meet the conditions for application of the tax rates as prescribed in Clauses 2 and 3 of this Article.*

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**Official Letter No. 2169/TPHCM-QLDN3 dated 9 March, 2026 issued by the Ho Chi Minh City Tax Department regarding FDI companies that will not be eligible for corporate income tax exemption**

According to the Official Letter, the Ho Chi Minh City Tax Department provides guidance that where a company meets the criteria of a small- and medium-sized enterprise (“SME”) but has foreign investment capital, it would not be eligible for corporate income tax (“CIT”) incentives as prescribed under:

- Article 10 of Resolution No. 198/2025/QH15 dated 17 May 2025 issued by the National Assembly on certain special mechanisms and policies for private sector development; and
- Clause 3, Article 7 of Decree No. 20/2026/ND-CP dated 15 January 2026 issued by the Government, detailing and guiding the implementation of Resolution No. 198/2025/QH15.



# NEWSLETTER IN MARCH 2026

05

## Circular No. 20/2026/TT-BTC detailing a number of Articles of the Law on Corporate Income Tax and Decree No. 320/2025/ND-CP dated December 15, 2025 of the Government

On March 12, 2026, the Ministry of Finance issued Circular No. 20/2026/TT-BTC, detailing a number of Articles of the Law on Corporate Income Tax and Decree No. 320/2025/ND-CP.

Compared to Decree No. 320/2025/ND-CP, Circular No. 20/2026/TT-BTC introduces several notable detailed guidance points, including:

**(i) Detailed guidance on supporting documentation for deductible expenses that were previously not specifically addressed, including:**

- Authorization dossiers for employees to perform non-cash payments for expenses of VND 5 million or more;
- Expenses incurred for vocational education and training of employees;
- Sponsorships for scientific research, technology development, innovation, and digital transformation;

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## Circular No. 20/2026/TT-BTC detailing a number of Articles of the Law on Corporate Income Tax and Decree No. 320/2025/ND-CP dated December 15, 2025 of the Government

- Expenses incurred in support of production and business activities that have not yet generated corresponding revenue, including: Costs related to disposal of inventories, raw materials, or damaged assets; Marketing and product/service introduction expenses incurred prior to revenue generation; Land rental and infrastructure costs incurred during the pre-operational phase; v.v

### **(ii) Clarification on the timing for determining taxable revenue in certain cases, including:**

- For exported goods: the point in time when ownership is transferred in accordance with the export contract;
- For capital transfers: the point in time when ownership of the capital is transferred;
- For transfers of securities and certificates of deposit: the point in time of transfer;
- ....

### **(iii) Guidance on corporate income tax applicable to foreign enterprises operating in Vietnam:**

Circular No. 20/2026/TT-BTC shall take effect **from March 12, 2026 and is applicable from fiscal year of 2025.**

# NEWSLETTER IN MARCH 2026

06

## Introducing key guidance on the new points regarding CIT under Decree 320/2025/NĐ-CP and Cir. 20/2026/TT-BTC

*Official Letter No. 720/CST- TN dated 27 March 2026 issued by the Department of Policy Management and Supervision on Taxes, Fees and Charges – Ministry of Finance*

On 27 March 2026, the Department of Policy Management and Supervision on Taxes, Fees and Charges issued an official letter introducing key guidance on CIT under Decree 320/2025/NĐ-CP and Cir. 20/2026/TT-BTC.

In the Official Letter, the Authority provides detailed guidance on the amendments and removals relating to Corporate Income Tax (“CIT”) under Decree No. 320/2025/ND-CP and Circular No. 20/2026/TT-BTC, highlighting several notable points as follows:

**(i) Taxable revenue for CIT purposes is defined as the total income received by foreign contractors and subcontractors, without deduction of any taxes payable.**

*(Previously, VAT was allowed to be excluded when determining CIT taxable income for foreign contractors.)*

**(ii) Timing for determining taxable revenue for exported goods is the point at which ownership is transferred in accordance with the contract.**

*(Previously, this was based on the completion of customs procedures.)*

# NEWSLETTER IN MARCH 2026

06

## Introducing key guidance on CIT under Decree 320/2025/NĐ-CP and Cir. 20/2026/TT-BTC

*Official Letter No. 720/CST- TN dated 27 March 2026 issued by the Department of Policy Management and Supervision on Taxes, Fees and Charges*

**(iii) Revision to the threshold and scope of non-cash payment supporting documents, which are now required for purchases of goods and services, as well as other expenses, with a value of VND 5 million or more per transaction.**

*(Previously, this requirement only applied to input invoices with a value of VND 20 million or more.)*

**(iv) Additional requirement on non-cash payment documentation where enterprises authorize employees to procure goods and services valued at VND 5 million or more per transaction.**

**(v) Removal of the provision allowing the first or final tax period (if shorter than 03 months) to be consolidated with the adjacent tax period. This matter is now governed under the tax administration regulations.**

The letter also sets out guidance on a number of new points. Kindly refer to the document for further information.

# ABBREVIATION

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<b>CIT</b>	Corporate Income Tax	<b>JVC</b>	Joint Venture Company
<b>PIT</b>	Personal Income Tax	<b>Ltd.</b>	Limited
<b>VAT</b>	Value Added Tax	<b>PC</b>	People's Committee
<b>FCT</b>	Foreign Contractor Tax	<b>MOF</b>	Ministry of Finance
<b>FA</b>	Fixed Asset	<b>MOIT</b>	Ministry of Industry and Trade
<b>GDT</b>	General Department of Taxation	<b>MOLISA</b>	Ministry of Labor, Invalid and Social affairs
<b>EPE</b>	Export Processing Exporting Company	<b>DPI</b>	Department of Planning and Investment
<b>EPZ</b>	Export Processing Zone	<b>OD</b>	Official Dispatch
<b>UAL</b>	Usage of Agricultural Land	<b>SBV</b>	The State Bank of Vietnam
<b>IZ</b>	Industrial Zone	<b>FC</b>	Foreign Contractor





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