



VINA BOOKKEEPING CO., LTD

Company Incorporation | Accounting | Tax | Payroll | Advisory

NEWSLETTER IN APRIL 2026

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01

Official Letter No. 720/CST- TN dated 27/04/2026 issued by the Department of Policy Management and Supervision on Taxes, Fees and Charges guidance on CIT under Decree 320/2025 and Circular 20/2026

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.)

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(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.

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02

Official Letter No. 3716/NBI-QLDN2 on 02 April 2026 issued by Ninh Binh Tax Department on input invoices exceeding VND 5 million must be supported by a contract to be treated as deductible expenses

The Tax Department of Ninh Binh Province has recently issued Official Letter No. 3716/NBI-QLDN2 providing guidance on the supporting documentation required for deductible expenses.

According to the Official Letter, for **purchases of goods, services of VND 5 million or more per transaction**, where payment has not yet been made at the time the expense is recognized, **the company is allowed to treat such deductible expenses** for the purpose of determining taxable income, **provided that a valid contract for the purchase of goods or services is in place.**

Legal basis:

“Article 3. Supporting documentation for expenses deductible as prescribed in Points b and c, Clause 1, Article 9 of the Law on Corporate Income Tax

... 13. Supporting documentation for certain expenses as prescribed in Point c, Clause 1, Article 9 of the Law on Corporate Income Tax is as follows:

... c) In cases where goods or services are purchased on a per-transaction basis with a value of VND 5 million or more, and payment has not yet been made at the time of expense recognition, such expenses may still be treated as deductible for the purpose of determining taxable income, provided that there is a contract for the purchase of goods or services and a delivery/acceptance record. Upon payment, the enterprise must also obtain non-cash payment supporting documents.”

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03

Official Letter No. 3962/TNI-QLDN1 dated 16 April 2026 issued by the Tay Ninh Province Tax Department provides guidance on the PIT exemption applicable to night shift allowances, overtime payments, and payments for unused annual leave days in accordance with prevailing regulations

On April 16, 2026, Tay Ninh Province Tax Department issued the Official letter 3962/TNI-QLDN1 guidelines **PIT policy on night work pay, overtime pay, and pay for unused annual leave days** according to regulations.

According to the Tax Department of Tay Ninh province, wages for night work, overtime, wages, and salaries paid for days without leave according to the provisions of law arising in the 2026 personal income tax period (from January 1, 2026 to December 31, 2026) are income **exempt from PIT according** to the provisions of Article 4 of the Law on Personal Income Tax 2025.

Legal basis:

“According to Article 29, the Law on Personal Income Tax 2025 was passed by the National Assembly, effective from July 1, 2026.

However, regulations related to income from salaries and wages of resident individuals apply from the 2026 tax period.

Pursuant to Article 4, Law on Personal Income Tax 2025

Article 4. Tax-exempt income

.. 8.Wages for night work, overtime, wages and salaries paid for unused annual leave according to the provisions of law.”

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04

Official letter 2708/CT-CS on 28/04/2026 issued by the Tax Department provides guidance on Tax Declaration for Representative Offices of Foreign Traders

On 28 April 2026, the Tax Department issued Official Letter No. 2708/CT-CS regarding personal income tax (PIT) declaration obligations applicable to representative offices of foreign traders, specifically as follows:

Where a representative office of a foreign trader in Ho Chi Minh City acts as an income payer and is not subject to value-added tax (VAT) declaration, the representative office shall declare PIT on a **monthly basis** in accordance with Clause 1, Article 8 of Decree No. 126/2020/ND-CP dated 19 October 2020 of the Government.

In cases where the taxpayer has declared tax on a quarterly basis but does not meet the conditions for quarterly tax declaration, the implementation shall comply with Clause 2, Article 1 of Decree No. 373/ND-CP dated 31 December 2025 of the Government.

ABBREVIATION

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





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