

Newsbrief

Progressional updates on Multilateral Competent Authority Agreement on the Exchange of Country-by-country Profitability reports

June 2026



Following the participation of Vietnam authority into Multilateral Competent Authority Agreement (MCAA) regarding the exchange of Country-by-country Profitability reports (CbCR), the Department of Taxation has recently issued Official Letter No. 3870/CT-CS as of 10 June 2026 to confirm the participation toward bilateral exchange mechanism with several counter jurisdictions.

Accordingly, 37 following jurisdictions have agreed to activate MCAA with Vietnamese authority in exchanging CbCR are listed below:

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|-------------------|---------------------|------------------------|
| 1. Australia | 14. Iceland | 27. Poland |
| 2. Austria | 15. India | 28. Portugal |
| 3. Belgium | 16. Ireland | 29. Russia |
| 4. Bulgaria | 17. Italia | 30. Singapore |
| 5. China | 18. Japan | 31. Slovakia |
| 6. Croatia | 19. Korea | 32. Slovenia |
| 7. Czech Republic | 20. Latvia | 33. Spain |
| 8. Denmark | 21. Luxembourg | 34. Sweeden |
| 9. Estonia | 22. Malaysia | 35. Switzerland |
| 10. France | 23. Malta | 36. Thailand |
| 11. Germany | 24. The Netherlands | 37. The United Kingdom |
| 12. Greece | 25. Norway | |
| 13. Hong Kong | 26. Peru | |

1. Impacts on Vietnamese taxpayers

Under the application of exchange mechanism, Vietnamese taxpayers are no longer required to maintain and submit copies of CbCR on an annual basis, as the Vietnamese tax authority would be able to access and obtain CbCR via sharing platform as stipulated under bilateral agreements. The Vietnamese tax authority will no longer obtain paper-based CbCR or other forms of manual submission from taxpayer's end.

2. Outlook and recommendations from Grant Thornton Vietnam

The participation of Vietnamese government into the above 37 bilateral exchange mechanisms has presented the efforts of Vietnam to integrate into the global cooperative environment as well as enhance transparency in tax administration. This is also considered as continuous efforts from Vietnamese government to comply with global tax environment, as more bilateral exchange mechanisms could be expected to achieve in the upcoming time. The bilateral mechanisms could also support in both Transfer pricing and Pillar 2 compliance where certain declarations of both subject matters are based on the availability of CbCR.

Taxpayers as foreign investment entities from the participating jurisdictions (including most of Vietnam's significant investors such as Singapore, Japan, Korea) would enjoy the reduction of document maintenance towards CbCR requirements. Vietnamese taxpayers whose Ultimate parent companies are located under the above jurisdictions are recommended to:

- Obtain and maintain a Notification letter regarding the submission of CbCR in home jurisdiction as evidence such submission from the Group
- Obtain and maintain the Vietnamese section of CbCR, as such context would be necessary for reconciliation and declaration of Pillar 2 compliance in Vietnam

Grant Thornton (Vietnam) Limited will continue updating the upcoming process of MCAA. Taxpayers are also recommended to pay attention to the prevailing requirements of CbCR in Vietnam and maintain proper filings of CbCR if so required.

Should you need further clarification on the above matters, please do not hesitate to contact us for discussion.

Contact

Please study the newly issued regulations and review the internal compliance procedures in order to comply with the regulations on customs tax as well as reduce errors in the process of filing and preparing documents that could lead to additional tax obligations or administrative penalty.

Please contact the experts of Grant Thornton Vietnam for in-depth advice if you have any inquiries during the implementation of tax and customs compliance

Please visit our [Tax Hub](#) to view more information

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