

Tax Newsbrief

Decree 236/2025/ND-CP on Application of Global Minimum Tax in Vietnam

September 2025



On 29 August 2025, the Vietnamese Government officially issued Decree No. 236/2025/ND-CP (Decree 236) providing detailed guidance on the implementation of the Global Minimum Tax (GMT) in Vietnam. This follows the issuance of Resolution No. 107/2023/QH15 (Resolution 107) dated 29 November 2023 which mandated the adoption of GMT in Vietnam in line with the Global Anti-Base Erosion (GloBE) rules.

Decree 236 will take effect from 15 October 2025 and will apply for tax year 2024.

This Newsbrief provides a general overview and key highlights of Decree 236 for your reference:

1. **Impacted taxpayers:** Vietnamese taxpayers that meet the following conditions will be subjected to GMT:
 - Constituent Entity (CE) of a Multinational Enterprise (MNE); and
 - MNE with consolidated global revenue of EUR750 million or more in at least two of the four fiscal years preceding the current fiscal year (certain exceptions may apply).
2. **GMT application:** Key provisions regarding the Qualified Domestic Minimum Top-up Tax (QDMTT) and Income Inclusion Rules (IIR) are summarized as follows:

	QDMTT	IIR
Impacted taxpayers	Vietnamese CE(s) of a MNE	Vietnamese CE that are: <ul style="list-style-type: none"> ▪ Either (i) ultimate parent entity; (ii) partially owned parent entity; or (iii) intermediate parent entity; and ▪ Directly own overseas CE(s) subject to low corporate tax rates
Jurisdictional minimum tax rate	15%	15%
Threshold for initial stage of international investment	QDMTT in Vietnam is considered nil in respective tax year if both conditions are met: <ul style="list-style-type: none"> ▪ MNE owns CEs in not over 6 jurisdiction ▪ Total value of tangible assets beyond reference country does not exceed EUR 50 million 	
Threshold under transitional period <i>(Applied for fiscal years from 31 December 2026 backward but not including fiscal years end after 30 June 2028)</i>	Jurisdictional top-up tax considered nil, based on Country-by-Country profitability report (CbCR) if: <ul style="list-style-type: none"> ▪ Qualified CbCR has been prepared and reported total revenue under EUR10 million and pre-tax profit under EUR1 million or losses at jurisdictional level ▪ Jurisdictional simplified effective tax rate at or above 15% for 2023 and 2024, 16% for 2025 and 17% for 2026 ▪ Jurisdictional pre-tax profit (loss) equal or lower than Substance-based Income Exclusion (per GloBE rules) according to qualified CbCR 	

	QDMTT	IIR
	<ul style="list-style-type: none"> Loss is reported in qualified CbCR <p>Administrative penalties generally waived in cases of:</p> <ul style="list-style-type: none"> Late or insufficient notification for GMT purposes Overdue (up to 90 days) for tax registration or tax filing submission Inaccurate declaration and/or registration without leading to any shortage to additional tax arrears or increase of tax refund/incentives/reduction 	

3. Filing requirements: all filing deadlines are calculated from the financial year end (FYE) of the Ultimate Parent entity.

Timeline	Requirement	Tax Form	
		QDMTT	IIR
FYE + 30 days	List of Vietnamese CE and Election Form of Filing CE (comprehensive form)	Form No. 01/TB-DVHT ¹	
FYE + 90 days ²	Tax Registration	Form No. 01-DKTD-DVHT ³	
FYE + 12 months	GMT filing dossier:		
	✓ Informational return on GMT	Form No. 01/TKTT-QDMTT	Form No. 01/TKTT-IIR
	✓ Return for Top-up tax	Form No. 01/TNDN-QDMTT	Form No. 01/TNDN-IIR
	✓ Explanation for variance from accounting principles	Form No. 01/TM	
	✓ Reports of financial data of each CE for consolidation purposes	Per home jurisdiction	Per home jurisdiction

¹ Submit via (i) direct submission at tax authority, or (ii) post courier, or (iii) electronic portal

² Tax registration deadline is extended for Group with financial year ended on or before 30 June 2025. New deadline is 90 days from effects of Decree 236 (i.e. 90 days after 15 October 2025) but no later than tax declaration deadline.

³ The taxpayer is expected to receive Form No. 01-MST-DVHT from tax authority to inform result of tax registration.

Timeline	Requirement	Tax Form	
		QDMTT	IIR
	✓ Consolidated financial statement of Ultimate Parent entity	<i>Not required</i>	Per home jurisdiction
FYE + 15 months (18 months for the first year)	GloBE Informational return of MNE	Per home jurisdiction	<i>Not required</i>

4. Grant Thornton Vietnam's Recommendations

To prepare for the application of GMT under Decree 236, we recommend Vietnamese taxpayers take the following steps:

- Review the qualification of Vietnamese GMT application:
 - ✓ Obtain CbCRs from UPE for the last 4 financial years.
 - ✓ Review the Vietnamese CE(s) and associated financial position in tax year 2024 and assign Filing CE.
- Assess GMT impacts:
 - ✓ Calculate the Vietnamese effective tax rate in 2024 and estimate top-up tax obligation (if any).
 - ✓ Review the qualifications of transitional threshold and de minimis rules.
- Ensure compliance with current submission requirements:
 - ✓ Prepare and submit List of Vietnamese CE(s) and Election Form for Filing CE.
 - ✓ Complete tax registration for GMT application within the prescribed deadline.
- Stay proactive with regulatory changes and preventive for tax risks:
 - ✓ Collaborate and communication with headquarters on the implications of Decree 236 and Vietnamese GMT application.
 - ✓ Coordinate with other CE(s) for GMT purposes, since GMT audit will comprehensively cover Filing CE and other Vietnamese CE(s).
 - ✓ Seek professional tax advice to ensure proper actions for GMT determination and compliance planning.

Grant Thornton (Vietnam) Limited will continue to monitor developments on GMT in Vietnam and provide timely updates. Should you require further clarification or wishes to discuss the implications for your business, please do not hesitate to contact us.

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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