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Tax Policy Update

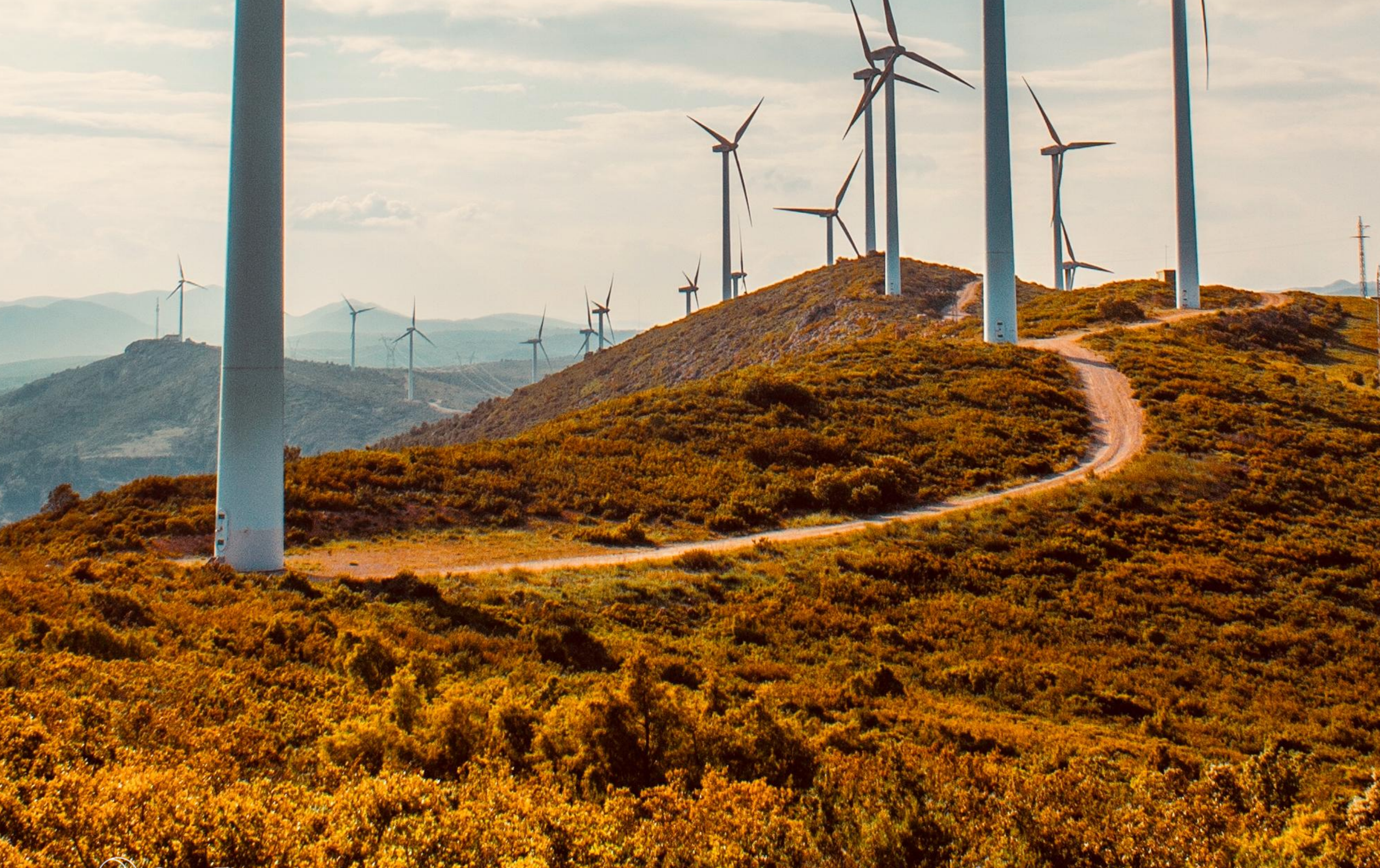
Decree 252 Guiding the Implementation of the Law on Tax Administration 108/2025/QH15

July 2026

In this Newsletter, Grant Thornton Vietnam would like to provide our Valued Clients with an update on Decree 252 guiding the implementation of the Law on Tax Administration 108/2025/QH15.

On 30 June 2026, the Government issued Decree 252/2026/ND-CP ("Decree 252"), detailing a number of articles and measures for organizing and implementing the Law on Tax Administration 108/2025/QH15. Decree 252 took effect on 1 July 2026.

Key highlights of Decree 252:



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1. Tax registration deadlines

- **New regulations:** (1) regulations on initial tax registration deadlines for branches and transaction offices established by credit institutions; (2) tax registration deadlines for dependents; (3) taxpayers are not required to carry out procedures for updating information with tax authorities where taxpayer information is already available in the national database; the tax administration information system will automatically notify taxpayers when changes have been updated.

- **Amended regulations:** (1) tax registration deadlines applicable to organizations and individuals registering for a tax identification number used for tax payment on behalf of another party; (2) cases where taxpayers conduct initial tax registration through tax returns integrated with tax registration information.

2. Deadlines for submission of tax returns

New regulations

(1) Cases where tax declaration and payment must be made before the tax authority issues authenticated e-invoices for each transaction incurred by business households and individuals not subject to mandatory e-invoice usage;

(2) Cases where individuals are present in Vietnam for fewer than 183 days but their cumulative presence reaches 183 days or more within 12 consecutive months.

Amended regulations

(1) Tax returns for taxes declared on a transaction-by-transaction basis must be submitted no later than the tenth (10th) day following the date on which the tax obligation arises;

(2) Deadlines for filing personal income tax returns arising from transfers or inheritances of real estate for which land use right certificates and certificates of ownership of assets attached to land have been issued.

3. Amendments to regulations on supplementary tax declarations

- Where conclusions, judgments, or decisions of competent authorities determine that a seller has used illegal invoices or unlawfully used invoices, the purchaser must submit supplementary tax declarations to adjust the tax obligations relating to the corresponding invoices (including tax periods already subject to inspection or audit) and shall be dealt with in accordance with regulations.

- Where taxpayers make supplementary declarations or implement conclusions and handling decisions following tax inspections or audits relating to supplementary corporate income tax returns under the Global Anti-Base Erosion rules ("GloBE rules"), the exchange rate applied shall be the one used in the original tax return, or the exchange rate on the last day of the filing deadline if the taxpayer has not yet submitted the tax return.

4. Fulfillment of tax obligations upon exit from Vietnam

- If an enterprise ceases operations at its registered address and fails to restore or terminate the validity of its tax code within 120 days from the date of notification, the business individual, household business owner, beneficial owner, or legal representative may be temporarily suspended from exit.

- The tax authority shall cancel the exit suspension when the taxpayer settles part of the outstanding tax debt and the remaining debt is below VND 50 million for individuals/business households or VND 500 million for enterprises, cooperatives, and unions of cooperatives.

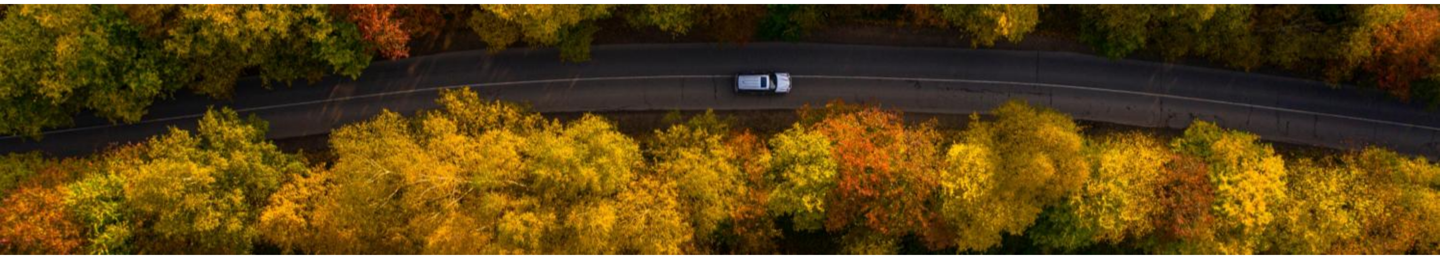
5. Withholding and remittance of taxes for e-commerce platform activities

- New regulations:

(1) Operators of e-commerce platforms with online ordering and payment functionalities (domestic and international) are required to withhold and remit value-added tax and corporate income tax on each revenue-generating transaction in Vietnam carried out by foreign suppliers through e-commerce platforms;

(2) Responsibilities of Vietnamese business organizations applying the VAT credit method when purchasing goods and services from foreign suppliers and non-resident individuals via e-commerce platforms;

(3) Where a Vietnamese business organization has already withheld tax, the e-commerce platform operator is not required to withhold tax on the same transaction. The Vietnamese business organization shall provide tax payment documents evidencing payment on behalf of the foreign party to the platform operator.



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6. International tax cooperation and preferential regime for taxpayers

- Supplementing a simultaneous tax examination mechanism under the Multilateral Convention on Mutual Administrative Assistance in Tax Matters ("MAAC"), of which Vietnam is a member.

- Supplementing a preferential regime for taxpayers, including detailed regulations on forms of preference, scope of application, eligibility conditions, and implementation mechanisms.

7. Profit remittance abroad

- Foreign investors may remit profits abroad only after the Vietnamese enterprise has fully fulfilled its financial obligations to the State, submitted audited financial statements and corporate income tax finalization returns, and has no outstanding tax liabilities at the time of remittance.

- Foreign investors are not permitted to remit profits generated in a financial year if the enterprise still has accumulated losses after loss carry-forward in accordance with corporate income tax regulations.

- Enterprises within the scope of the Global Minimum Tax regime should note that annual profit remittance abroad is not affected by the filing and payment deadline of the Qualified Domestic Minimum Top-up Tax ("QDMTT"). Under the regulations, foreign investors may still remit profits after the enterprise has fulfilled its financial obligations, submitted audited financial statements and corporate income tax finalization dossiers, and has no outstanding tax liabilities at the time of remittance. Although QDMTT is subject to a later filing and payment deadline (12 months from the end of the fiscal year), this tax is generally recognized as current tax expense and reflected in after-tax profits, thereby not creating cash flow shortages for future tax obligations.

8. Effective date and transitional regulations

- Decree 252 takes effect on 01 July 2026.
- Regulations on VAT allocation for certain sectors, including construction, real estate transfers, manufacturing, hydropower, and telecommunications, will remain effective only until 31 December 2026.
- Decree 125/2020/ND-CP dated 19 October 2020 on administrative penalties and its corresponding amending and supplementing decrees shall continue to remain effective until replaced by new regulations.

Implications for businesses:

Review and update tax compliance procedures

Businesses should update tax registration, declaration, supplementary filing, and tax filing deadline management procedures to comply with the new regulations and mitigate penalty risks.

Assess the impact on digital business models and cross-border transactions

Businesses operating through e-commerce platforms, particularly those transacting with foreign suppliers, should review withholding obligations, tax remittance responsibilities, and tax accountability among transaction parties.

Plan profit distribution and tax obligations

Foreign investors should carefully consider the new conditions applicable to profit remittance abroad.
Businesses subject to the Global Minimum Tax regime should proactively assess the impact on profit distribution planning and prepare resources to meet tax obligations on time.

How can Grant Thornton support your business?

Impact assessment and compliance advisory

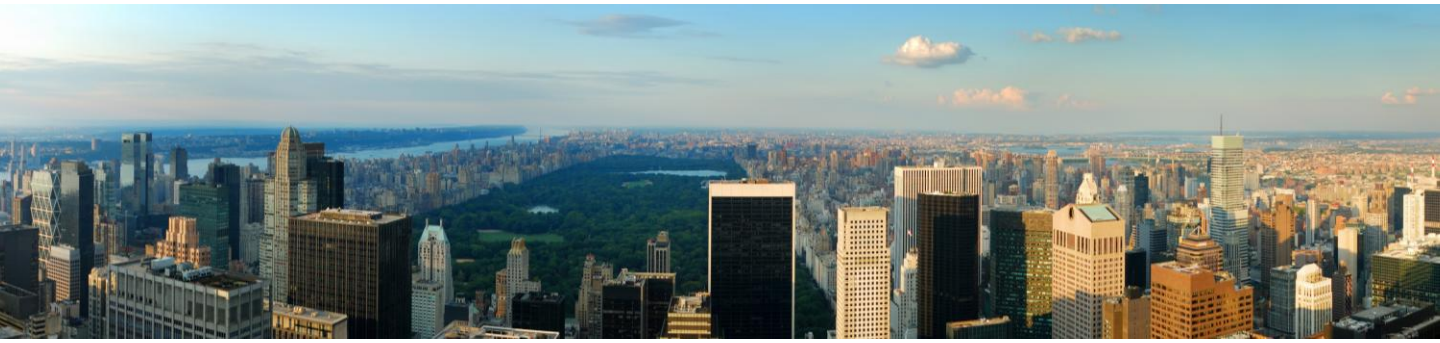
Support in assessing the impact of Decree 252/2026/ND-CP on business operations and advising on appropriate compliance measures.

Review of tax procedures and obligations

Support in evaluating tax registration, tax filings, invoice management, e-commerce activities, profit remittance abroad, and related obligations to minimize compliance risks.

Assistance with implementation and liaison with tax authorities

Assistance in preparing documents, implementing procedures under the new regulations, and supporting enterprises in providing explanations and working with tax authorities where necessary.



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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