



MAIN CONTENTS

+ UPDATE LATEST REGULATIONS

1. General provisions on the mechanism for certification of origin of goods under the RCEP.
2. Novelties on the price to calculate registration fees for real estate sale and purchase contracts that do not separate housing and land values.
3. Conditions for agreement on deferred payment of insurance premiums without security.
4. Novelties on compulsory insurance of civil liability for third parties in construction activities.

+ ARTICLE

Advertising on national broadcast viewed from legal regulations to practical application.

+ GOOD READINGS FOR YOU

1. Proposal to extend the Resolution on pilot settlement of bad debts for another 3 years.
2. Vietnam-U.S. cooperation to resolve extrajudicial trade and investment disputes.
3. Proposal to extend the time limit for temporary payment or corporate income tax.

+ LEGAL GUIDANCE'S

1. Electricity cost payment to solar power investors.
2. Value-added taxes on construction and installation activities.
3. Value-added tax reduction policy.
4. Determination of personal income taxable income.

+ NEWLY ISSUED LEGAL DOCUMENTS IN FEBRUARY

1. General provisions on the mechanism for certification of origin of goods under the RCEP

On 18 February 2022, the Ministry of Industry and Trade issued Circular 05/2022/TT-BCT (“Circular 05/2022”) on the Rules of origin of goods under the Regional Comprehensive Economic Partnership (RCEP), including regulations on the mechanism for certification of origin of goods under the RCEP.

Accordingly, Article 19 of Circular 05/2022 prescribes the mechanism for certification of origin of goods under the RCEP as follows:

- Exports originating from Vietnam to member countries are considered for preferential tariff treatment within the framework of the RCEP when there is a Certificate of Origin (C/O) issued under this Circular 05/2022.
- Imports into Vietnam originating from member countries will be considered for preferential tariff treatment upon submission of one of the following certificates of origin:
 - ✓ C/O issued by the C/O issuers of the exporting member country or the C/O issuers, the qualified exporters of the intermediate member country that may issue back-to-back certificates of origin of goods in accordance with Circular 05/2022.
 - ✓ Self-certification of origin of goods issued by qualified exporters according to the following provisions:
 - Being issued in writing or in other formats including electronic form.
 - Including the minimum information as prescribed in Appendix II of Circular 05/2022.
 - Taking effect within 1 year of issuing.
 - Using the English language, with the signature and name of the self-certifying person and the date of issuing.

Note that on the date of entry into force of the RCEP, the goods that are in the process of being transported to or have not yet been imported into the importing member country, meeting Circular 05/2022 will be considered for tax incentives. The importer declares and submits the certificate of origin within 180 days of the entry into force of the RCEP.

In addition, Circular No. 05/2022 also stipulates the contents of the Rules of Origin, including the cases in which goods are identified to have an origin, be cumulative, in simple processing, or in direct shipping etc. The content of these terms is generally not different from the ASEAN Trade in Goods Agreement (ATIGA) and some ASEAN+1 Agreements to which Vietnam is a member.

Circular 05/2022/TT-BCT will take effect from 04 April 2022.

2. **Novelties on the price to calculate registration fees for real estate sale and purchase contracts that do not separate housing and land values**

On 28 February 2022, the Ministry of Finance issued Circular 13/2022/TT-BTC (“**Circular 13/2022**”) detailing a number of articles of Decree 10/2022/ND-CP regulating registration fees in which it is worth noting that the regulation on the price to calculate registration fees for real estate sale and purchase contracts that do not separate housing and land values.

Accordingly, Article 3.1.c of Circular 13/2022 stipulates the price for calculating registration fees for house and land prices in land use right transfer contracts, house sale and purchase contracts without separating the values of house and land as follows:

- In case the total value of houses and land in the land use right transfer contract or the house sale and purchase contract is higher than the total value of the house and land calculated at the price promulgated by the People's Committee of the province, the registration fee calculation price is the one in the sale contract or transfer contract.
- In case the total value of houses and land in the land use right transfer contract or the house sale and purchase contract is lower than the total value of the house and land calculated at the price promulgated

by the provincial People's Committee, the registration fee calculation price is the one promulgated by the provincial People's Committee in accordance with the law on land and the law on construction at the time of declaring registration fees.

In addition, Circular 13/2022 also clearly stipulates that the price for calculating registration fee for an apartment will exclude maintenance costs for the common area of the apartment building. In case the house sale contract and the house sale invoice do not separate the maintenance costs for the common area of the apartment building, the price for calculating the registration fee is the total value of the house stated on the house sale invoice or the house sales contract.

Circular 13/2022 takes effect on 01 March 2022 and abolishes Circular 301/2016/TT-BTC and Circular 20/2019/TT-BTC.

3. **Conditions for agreement on deferred payment of insurance premiums without security**

On 28 February 2022, the Ministry of Finance issued Circular 14/2022/TT-BTC amending Circular 50/2017/TT-BTC guiding the implementation of Decree 73/2016/ND-CP guiding the Law on Insurance Business and the revised Law on Insurance Business and Circular 04/2021/TT-BTC guiding Decree 03/2021/ND-CP on compulsory insurance for civil liability of motor vehicle owners in which it is worth noting that the regulation on the conditions for agreement on deferred payment of

insurance premiums without security between insurance buyers and insurance enterprises.

Accordingly, from 28 February 2022, the insurance buyer and the insurance enterprise may agree on changing the time-limit for payment of premiums or agree on deferred payment of premiums without security or guarantee letters upon fully meeting the following conditions:

- The insurance buyer or the insurance enterprise (including its head office, branch, representative office, business location) at:
 - (i) Localities under social distancing as prescribed in Directive No. 15/CT-TTg, Directive No. 16/CT-TTg of the Prime Minister; or
 - (ii) Areas under medical quarantine, blockade of clusters to control the COVID-19 epidemic according to

the documents of competent authorities; or

- (iii) Localities to have the COVID-19 epidemic level as very high risk, high risk according to Resolution No. 128/NQ-CP of the Government.

- The insurance buyer incurs an obligation to pay insurance premiums during the period from 01/01/2021 until the time the Prime Minister announces the end of the COVID-19 epidemic. In no event will the term of premium payment exceed the period of insurance under its policy.

Circular 04/2021/TT-BTC takes effect from the date of signing, i.e. 28 February 2022.

4. **Novelties on compulsory insurance of civil liability for third parties in construction activities**

On 10 March 2022, the Government issued Decree 20/2022/ND-CP (“**Decree 20/2022**”) amending and supplementing a number of articles of Decree 119/2015/ND-CP regulating compulsory insurance in construction investment activities. Decree 20/2022 will take effect from 01 July 2022, adding novelties on compulsory insurance of civil liability for third parties.

According to Decree 20/2022, from 01 July 2022, construction contractors, in addition to buying compulsory insurance for construction workers on the construction site, they must purchase compulsory insurance of civil liability for third parties. This premium may be included in the cost of production and business.

Regarding the insurance period:

The term of compulsory insurance for civil liability for a third party is a specific period from the start date to the end date of the construction period under construction contracts and stated in the relevant policy.

Regarding the scope of insurance:

The insurance enterprise indemnifies the construction contractor for the

amounts that, according to the law, the construction contractor is responsible for indemnifying a third party for non-contractual damage to health, life, property directly incurred during the construction process and relevant legal costs (if any) within the scope of insurance liability as agreed in the relevant policy.

Regarding the minimum insured value:

- For damage to health and life: VND100 million/ person/claim without limiting the number of claims.
- For property damage and related legal costs (if any), it is determined as follows:
 - ✓ For the works valued at less than VND 1,000 billion, the minimum insured value is 10% of the value of the works for the entire insurance period without limiting the number of claims.
 - ✓ For the works valued at 1,000 billion VND or more, the minimum insured value is VND100 billion for the entire insurance period without limiting the number of claims.

GV Lawyers would like to introduce to readers an article by our Lawyers, **Le Quang Vy** and **Le Thi Hong Nga** titled **“Advertising on national broadcast viewed from legal regulations to practical application”** published in the Vietnam Lawyers Electronic Journal on 16 August 2021.

Advertising is no longer a strange term for consumers, especially for television audience. Currently, in order for advertising to “ingrain” into each consumer, each onlooker, businesses often put their products on television with continuous and dense frequency. This has led many viewers from the sense of being interested and looking forward to TV ads to the emotion of becoming “bored” and even “overwhelmed” with such TV ads.



whereby commercial advertising is understood as trade promotion activities of traders to introduce customers the business activities in respect of their goods and services [2].

The Law on Advertising 2012 stipulates that advertising content must be honest, accurate, clear, and not cause damage to producers, traders and ad recipients [3]. For special goods, products and services such as cosmetics, food, food additives, medical equipment; medical examination and treatment services, etc., advertising contents must also meet the requirements specified in Decree 181/2013 dated 14 November 2013 of the Government.

Advertising can be conveyed to the recipient through many different advertising media, in which the press can be considered one of the quite popular channels used by businesses. According to the

Press Law 2016, television is considered a type of television journalism. Therefore, the advertising on television is governed by Article 22 of the Law on Advertising 2012, notably the regulations on advertising duration, specifically:

- The duration of advertising must not exceed 10% of the total duration of a broadcast program per day of a broadcasting organization, except for the duration of advertising on channels and programs specialized in advertising.
- The duration of advertising on a pay TV channel must not exceed 5% of the total duration of a broadcast program per day of a broadcasting organization, except for channels and programs specialized in advertising.
- Advertising is not allowed in the following programs: news programs; live TV programs on special political events,

Which laws govern television advertising?

The Law on Advertising 2012 defines advertising as the use of means to introduce the general public the products, goods and services for profit purposes; products and services with non-profit purposes; organizations and individuals trading in introduced products, goods and services, except for current news, social policies and personal information [1]. In addition, previously the Commercial Law 2005 also defined advertising in commercial activities,

celebrating major national holidays.

- Each feature film program must not be interrupted for advertising more than twice, each time not exceeding 05 minutes. Each entertainment program must not be interrupted to advertise more than four times, each time not exceeding 05 minutes.

In case of violation of the advertising duration as prescribed above, television stations will face an administrative fine of between VND50 and 100 million and be forced to remit the profits gained from the violation. (Articles 40.3 and 40.5 of Decree 38/2021 dated March 29, 2021 of the Government).

Referring to the law in the UK, the law related to television advertising is called Code on the Scheduling of television advertising, in which the duration of television advertising is managed under many different angles, not just counting on the total broadcasting time like Vietnamese law. Specifically, for television services provided in the UK, depending on the type of TV channel, there are different regulations on advertising duration (non-public service channels will not be allowed

to broadcast advertising programs exceeding 12 minutes per hour of broadcasting, while public service channels will be allowed to broadcast advertising programs with a duration of no more than 7 minutes per hour of broadcast), at special time frames, advertising duration will be different (for example, for public service channels in the time frame from 18:00 to 23:00, the advertising duration will be increased to 8 minutes per broadcast hour). Depending on the length of the broadcast, each program allows a different number of times to be interrupted for advertising (for public service channels, programs with a duration of 45-54 minutes will be allowed to interrupt for ads twice, and programs with a duration of 55 -65 minutes will have three breaks for advertising...), the advertising break between programs is no more than 3 minutes 50 seconds for public service television channels, children's programs with a broadcast duration of 30 minutes or less will not be allowed to interrupt for advertising[4]...

Attraction of television advertising

Currently, television is still one of the media channels that attracts a large audience

compared to many other media and newspapers. Therefore, television has become an advertising medium used by many businesses and this is also a lucrative source of revenue for television stations.

Nowadays, the majority of consumers can access advertising in many different and diverse sources. For advertisements published in newspapers, readers have the right to see or not to see; for ads on websites, viewers can choose to the feature "skip" to not continue watching ads. However, for television advertising, the audience does not have that choice. This is also the advantage of advertising products on television. As in order to continue watching their favorite TV shows, TV viewers have to accept to watch ads reluctantly, which leads to many viewers becoming "bored" and "overeating" with their advertisement.

From its advantages as well as its strengths compared to other advertising means, in fact, there has been abuse of advertising from broadcasters as well as businesses. Especially at prime time broadcasts, taking advantage of the program appeal to the audience as well as the advantage of the prime time broadcast, television

stations are taking advantage of the opportunity to increase the frequency of broadcasts and insert advertisements into broadcast programs. Catching up with that trend, businesses are not afraid to spend significant costs to be able to put their ads on television in prime time frames and of course, as a rule of thumb, this is also an opportunity for broadcasters to increase advertising fees, thereby increasing their own revenue.

So, both the broadcaster and businesses as well benefit from this fact, while the disadvantage falls on the audience, their potential customers inadvertently becoming the “suffering” side in the reckoning. For the said benefit, the audience should have been the subject “taken care of” by broadcasters and businesses.

Limitations of the enforcement mechanism

Advertising is an indispensable commercial activity in the market economy. The State always enables policies to encourage as well as protect the legitimate rights and interests of organizations and individuals in advertising activities.

However, to balance the benefits between TV audience and advertisers and broadcasters is a difficult problem.

We already have the Law on Advertising as well as regulations on sanctions for violations in advertising activities in general and violations of advertising broadcast time on television channels in particular. However, the practical application seems to have many shortcomings because of the monitoring mechanism.

Indeed, no one can sit for hours in front of the television to check, “to meticulously reckon” the advertising broadcast time of the stations. And moreover, if there is a discovery, it seems impossible to establish evidence for the violation. Therefore, it is necessary to set up an inspection and supervision mechanism for the law to come to life. In fact, the regulation on limiting the amount of advertising time on television is not the choice of many other countries such as the United States, Australia, Singapore, Japan, Korea... These countries do not have regulations about advertising time restrictions. Instead, they choose different

management models, mainly focusing on advertised products and services and advertising recipients.

In parallel with the legal corridor, it is thought that we also need to build a code of moral rules in advertising activities as moral advertising is one of the important criteria in building business images.

Amid the increasing boom of today’s media, the audience has more options to access information as well as entertainment programs, broadcasters should focus on highly improving program quality and contents; arrange advertising contents between programs in a reasonable way, and avoid any abuse.

After all, television stations cannot exist and television advertising is meaningless without any audience.

[1] Article 2.1 Law on Advertising 2012

[2] Article 102 of the Commercial Law 2005

[3] Article 19 of Law on Advertising 2012

[4] Code on the Scheduling of television advertising (https://www.ofcom.org.uk/data/assets/pdf_file/0014/32162/COSTA-311220.pdf)

1. Proposal to extend the Resolution on pilot settlement of bad debts for another 3 years

The State Bank of Vietnam (SBV) is collecting comments on a draft resolution of the National Assembly on extending the application period of Resolution 42/2017/QH14 on pilot settlement of bad debts of credit institutions.

Accordingly, the SBV proposes extension of the application period of Resolution 42 through 15 August 2025 to avoid creating a legal loophole when this resolution expires on 15 August 2022, and has not yet issued a law on handling bad debts of credit institutions because it is necessary to comply with the sequence and procedures prescribed in the Law on Promulgation of Legal Normative Documents.

In order to ensure compliance with the sequence, procedures and time limit as prescribed, the State Bank also proposed the application of shortened sequence and procedures and adoption of a resolution to extend the application of Resolution No. 42.



Proposal to extend the Resolution on pilot settlement of bad debts until 2025.

The SBV's proposal was made in the context that Resolution 42 will expire in mid-August, putting the entire settlement mechanism under this resolution to an end. This will leave old debts resolved mid-way, while new bad debts continue to accrue due to the COVID-19 pandemic, to be prolonged or cannot be handled, as well as may reduce the sense of self-payment of customers' debts, the creditor's lawful rights of credit institutions will not be protected, adversely affecting the confidence of the public and investors in the policies of the Government on bad debt restructuring and settlement.

By Nhipsongdoanhnghiep.cuocsongantoan.vn

2. Vietnam-U.S. cooperation to resolve extrajudicial trade and investment disputes

On 08 March 2022, the United States Agency for International Development (USAID) and the Ministry of Justice of Vietnam signed a memorandum of understanding to formalize their commitment to cooperate in promoting the mechanism for settling trade and investment disputes out of courts in Vietnam.

Accordingly, activities under the MOU include: improving relevant policies and legislation, such as adopting international standards and best practices; enhancing capacity for



Memorandum of understanding signing ceremony.

stakeholders in the out-of-court dispute resolution network; strengthening

cooperation among other stakeholders; raising awareness of Vietnamese businesses and stakeholders about the benefits of out-of-court dispute resolution.

Currently, the demand for out-of-court dispute resolution in Vietnam has increased along with the strong economic growth and the active integration of Vietnam into the global economy. Out-of-court dispute resolution allows commercial and investment disputes to be resolved outside of the traditional judicial system, a process that can be lengthy and costly for businesses and increases the risk of doing business in a country. In addition, arbitral awards, a form of out-of-court dispute resolution, are

enforceable in many countries around the world while the outcome of litigation in court is not so.

Vietnam has been a member to more than 60 bilateral investment promotion and protection agreements and many free trade agreements with provisions on investment protection which allow for the settlement of disputes between the state and investors by arbitration. Moreover, in 1995, Vietnam joined the Convention on the Recognition and Enforcement of Foreign Arbitral Awards under which Vietnam must recognize and enforce foreign arbitral awards.

By Kinhthedothi.vn

3. Proposal to extend the time limit for temporary payment or corporate income tax

One of the issues of concern to the business community is the proposal to amend the regulation that enterprises must temporarily pay corporate income tax (CIT) for the first 3 quarters of the year not less than 75% of the annual CIT specified at Article 8.6.b of Decree No. 126/2020/ND-CP. If complying with current regulations, the time limit for temporary payment of CIT is in the third quarter of the year, and the enterprise must estimate the payable CIT amount of the whole year as a basis to determine the temporarily paid tax amount of the first 3 quarters of the year (the deadline is 30 October every year). It is not reasonable to ask enterprises to estimate the tax payable for the whole year while there are two months left to the end of the fiscal year.



Therefore, in the draft of the new Decree, the Ministry of Finance is proposing the following amendment: the total amount of corporate income tax, the remaining after-tax profit when appropriating the temporarily paid funds of 4 quarters is not less than 80% payable according to the annual finalization, applicable from the tax period 2021 onwards.

In addition, the Ministry of Finance also proposes respective amendment of Articles 8.6.c and 8.6.g of Decree No. 126/2020/ND-CP on temporary payment of remaining after-tax profit after appropriating funds at enterprises with 100% charter capital held by the State and temporary payment of quarterly CIT of foreign carriers.

By tapchitaichinh.vn

1. Electricity cost payment to solar power investors

Regarding the objects issuing invoices according to each arising provision: in case an organization is allowed to sell electricity and is subject to business registration, the tax authority will guide the organization or individual to issue invoices as prescribed; in case the organization is allocated land by the State to use it for the purpose of operating hospitals, schools, worship facilities, administrative and non-business agencies, ..., and during such operation, installing rooftop solar power systems for use and if excessive electricity is generated, it must be sold to EVN according to the signed contract, and an invoice needs to be issued to EVN, the tax authority then will issue an invoice for each such electricity provision according to regulations.

Regarding the value written on the invoice, it complies with the instructions in Articles 13.2.b and 13.2.c of Circular No. 219/2013/TT-BTC, which is the contract price multiplied by the 3% percentage for VAT calculation.

General Department of Taxation replies to the question of Vietnam Electricity in Official Letter No. 347/TCT-DNNCN dated 09/02/2022.

2. Value-added taxes on construction and installation activities

Construction and installation activities, that belong to the group of goods and services subject to the tax rate of 10% and stay out of the List of goods and services in Appendix I issued under Decree No. 15/2022/ND-CP, are eligible

for value-added tax (VAT) reduction as prescribed in Article 1.1 of Decree 15/2022/ND-CP.

The time of determining VAT for construction and installation activities occurs when the value of the work, work item or part of the work that has been handed over without VAT as prescribed in Article 8.5 of Circular No. 219/2013/TT-BTC.

For the value of works, work items or parts of work that have been handed over before February 1, 2022, the tax rate of 8% is not applicable (including the case in February 2022 where taxpayers recently issued invoices for goods and services sold/provided before February 1, 2022).

Ha Noi City Tax Department replies to the question of Geotechnical Research Center in Official Letter No. 7063/CTHN-TTHT dated 03/3/2022.

3. Value-added tax reduction policy

In case, the company calculates VAT according to the credit method, provides products that are applying the VAT rate of 10% and is not on the list of goods and services specified in Appendix I, II and III issued under Decree No. 15/2022/ND-CP, the VAT rate of 8% as prescribed in Article 1.2 of Decree No. 15/2022/ND-CP will be applied from February 1, 2022 to the end of December 31, 2022.

In case the Company provides other support services for insurance and social insurance that have not yet been classified (heading 6629009) on the list of goods and services specified in Appendix I issued under Decree No. 15

2022/ND-CP, such other support services are not subject to VAT reduction.

Ha Noi City Tax Department replies to the question of HSK Vietnam Audit Co. Ltd. in Official Letter No. 6779/CTHN-TTHT dated 02/3/2022.

4. Determination of personal income taxable income

In case the Company supports the entire amount obtained from the reduction of unemployment insurance

premiums according to Decision No. 28/2021/QĐ-TTg on the implementation of the policy to support employees and employers hit by the Covid-19 pandemic from the unemployment insurance fund; or for the purchase of medical equipment and supplies aimed at protecting employees, this amount is not included in the employee's personal income taxable income.

Ha Noi City Tax Department replies to the question of Vietnam Esports and Entertainment JSC. in Official Letter No. 6466/CTHN-TTHT dated 28/02/2022.

No.	Document title	Issuance date	Effective date
MINISTRY OF INDUSTRY AND TRADE			
1	Circular 05/2022/TT-BCT providing the Rules of Origin within the framework of the Regional Comprehensive Economic Partnership.	18/02/2022	04/4/2022
MINISTRY OF PLANNING AND INVESTMENT			
1	Circular 09/2016/TT-BKHDT guiding the supervision and assessment of investment for foreign investment activities in Vietnam.	14/02/2022	01/4/2022
MINISTRY OF JUSTICE			
1	Circular 02/2022/TT-BTP providing guidance on selection of property auction organizations.	08/02/2022	25/3/2022
MINISTRY OF FINANCE			
1	Circular 14/2022/TT-BTC amending and supplementing a number of articles of Circular 50/2017/TT-BTC guiding the implementation of Decree No. 73/2016/ND-CP on detailing the implementation of the Law on Insurance Business and the Law on Amending and Supplementing a Number of Articles of the Law on Insurance Business and Circular 04/2021/TT-BTC detailing a number of articles of Decree No. 03/2021/ND-CP on compulsory insurance for motor vehicle owner's civil liability.	28/02/2022	28/02/2022
2	Circular 13/2022/TT-BTC detailing a number of articles of Decree No. 10/2022/ND-CP on registration fee.	28/02/2022	01/3/2022
3	Decision 206/QD-BTC on application of e-invoices in 57 centralized provinces and cities.	24/02/2022	24/02/2022
4	Circular 09/2022/TT-BTC amending and supplementing a number of articles of the Regulations on consideration, verification and approval of foreign loans by the method of self-borrowing and self-payment of enterprises owned by the State over 50% of charter capital issued together with Circular 153/2014/TT-BTC of the Ministry of Finance.	14/02/2022	01/4/2022
5	Circular 07/2022/TT-BTC guiding the handover, receipt and handling of debts and assets except for the conversion of business ownership, public non-business units and as instructed by the Government, the Prime Minister Prime Minister.	09/02/2022	01/4/2022
6	Circular 6/2022/TT-BTC guiding the compliance supervision of the State Securities Commission with respect to activities in the securities sector of the Vietnam Stock Exchange and its subsidiaries, the Vietnam securities depository and clearing corporation.	08/02/2022	24/3/2022
7	Circular 05/2022/TT-BTC guiding the restructuring of enterprises that are not eligible for equitization and transfer of shares with receivables of the enterprises operating debt purchase, sale and settlement, whose 100% of charter capital is held by the State.	08/02/2022	01/4/2022



**GLOBAL VIETNAM
LAWYERS**

CONTACT US

info@gvlawyers.com.vn

HCMC - Head Office

8/F, Centec Tower,
72 – 74 Nguyen Thi Minh Khai,
Vo Thi Sau Ward, District 3
Ho Chi Minh City, Vietnam
Tel: +84 (28) 3622 3555

Ha Noi - Branch

10A/F, CDC Building,
25 Le Dai Hanh
Hai Ba Trung District
Ha Noi, Vietnam
Tel: +84 (24) 3208 3555

Da Nang - Branch

3/F, Indochina Riverside
Tower, 74 Bach Dang
Hai Chau District
Da Nang City, Vietnam
Tel: +84 (28) 3622 3555

The contents of the newsletter neither constitute legal advice nor necessarily reflect the opinions of our firm or any of our attorneys or consultants. The newsletter provides general information, which may or may not be complete or up to date at the time of reading. The content is not intended to be used as a substitute for specific legal advice or opinions. Please seek appropriate legal advice or other professional counselling for any specific issues you may have. We, GV Lawyers, expressly disclaim all liabilities relating to actions whether taken or untaken based on any or all contents of the newsletter.

