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# LEGAL NEWSLETTER

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**1. Law amending and supplementing a number of articles of the Law on Personal Income Tax, the Law on Value Added Tax, the Law on Corporate Income Tax, and the Law on Special Consumption Tax**

On April 24, 2026, the National Assembly passed Law No. 09/2026/QH16 (“**Law amending the 4 Tax Laws**”), which amends and supplements a number of articles of the Law on Personal Income Tax (“PIT”), the Law on Value Added Tax (“VAT”), the Law on Corporate Income Tax (“CIT”), and the Law on Special Consumption Tax (“SCT”). The Law amending the 4 Tax Laws took effect on the date of its adoption, i.e. April 24, 2026. However, the amendments relating to PIT, VAT, and CIT under Articles 1, 2, and 3 of the Law take effect from January 1, 2026.

Some notable changes introduced by the amending Law include adjustments to the mechanism for determining the tax-exempt revenue threshold applicable to certain small-scale business entities, as well as changes to the roadmap for applying SCT rates to battery-powered motor vehicles.

**1.1 Adjustment to the Mechanism for Determining Tax-Exempt Revenue Thresholds**

Pursuant to Articles 1, 2, 3, and 5.2 of the amending Law, from January 1, 2026, the revenue threshold eligible for exemption from PIT, VAT, and CIT will no longer be fixed at a statutory amount prescribed by law (for example, the previous threshold of VND 500 million/year for PIT and VAT purposes). Instead, the tax-exempt revenue threshold will be determined by the Government based on macroeconomic indicators, state budget balancing capacity, and the socio-economic conditions in each period.

Accordingly, the following subjects will be exempt from tax if their annual revenue does not exceed the threshold prescribed by the Government:

- PIT: applicable to resident individuals engaged in production and business activities.
- VAT: applicable to goods and services supplied by individuals and

household businesses engaged in production and business activities.

- CIT: applicable to organizations legally established in Vietnam.

Compared to the previous regulations, the Law amending the 4 Tax Laws changes the mechanism for determining the tax exemption threshold from a fixed statutory revenue threshold to a more flexible mechanism to be determined by the Government based on socio-economic conditions.

**1.2 Adjustment to the Roadmap for Applying SCT to Battery-Powered Vehicles**

Article 4 of the amending Law revises the SCT regulations applicable to battery-powered motor vehicles with fewer than 24 seats. Under the amendments, the currently applicable preferential tax rates (which vary depending on vehicle type and applicable period) will continue to apply starting from January 1, 2026. However, the roadmap for increasing the SCT rates will commence from January 1,

2031 instead of March 1, 2027 as previously prescribed.

Accordingly, depending on the type of vehicle, the current preferential tax rates will continue to apply until December 31, 2030. For example: passenger cars with up to 9 seats will be subject to an SCT rate of 3% from 2026, increasing to 11% from 2031; Passenger cars with 10 to under 16

seats will be subject to an SCT rate of 2% from 2026, increasing to 7% from 2031.

The above adjustment to the tax increase roadmap is considered a continued effort to encourage the development and use of environmentally friendly means of transportation during the transition toward clean energy.

## 2. Decree amending the regulations on value added tax

On May 5, 2026, the Government issued Decree No. 144/2026/NĐ-CP (“**Decree 144/2026**”) amending and supplementing a number of articles of Decree No. 181/2025/NĐ-CP, which provides detailed guidance for the implementation of certain provisions of the Law on Value Added Tax (“VAT”), as amended and supplemented by Decree No. 359/2025/NĐ-CP.

Decree 144/2026 will take effect from June 20, 2026, with the following notable amendments and supplements:

### 2.1 Supplementation and amendment of subjects not subject to VAT

Articles 1, 2, and 5 of Decree 144/2026 supplement and amend certain groups of subjects not subject to VAT as follows:

#### ▪ Newly supplemented subjects:

- ✓ *Personal insurance*: including life insurance, health insurance, student insurance, and insurance services related to human.
- ✓ *Agricultural insurance*: including insurance for livestock, crops, and other agricultural insurance services.
- ✓ *Fisheries insurance*: including insurance for fishing vessels, boats, and equipment directly serving fishing activities.

✓ *Reinsurance*: implemented in accordance with the laws on insurance business.

✓ *Oil and gas insurance*: applicable to oil and gas facilities, equipment, and foreign-flagged oil storage vessels operating in Vietnamese waters.

✓ Insurance brokerage commission revenue.

#### ▪ Amended subjects:

✓ *Debt trading and certificates of deposit*: including the sale of payables, receivables, and certificates of deposit.

✓ Exported natural resources and minerals: applicable to products listed in Appendices I and II of Decree 144/2026 (including both unprocessed and processed

products as prescribed), replacing Appendices I and II of Decree No. 181/2025/NĐ-CP.

### 2.2 Amendment to regulations on determination of VAT-taxable revenue

Under Article 3.1 of Decree 144/2026, the principle for determining revenue used to allocate deductible input VAT generally remains unchanged. Accordingly, the total revenue used to determine the allocation ratio includes revenue from taxable goods and services, non-taxable goods and services, added value from gold and silver trading, as well as revenue from goods not required to be declared and for which VAT payment is not required.

However, for credit institutions, branches of foreign banks, securities companies, and insurance enterprises, Decree 144/2026 revises the method for determining allocable revenue by referring to the relevant specialized laws, *instead of determining it based on the difference between selling price and purchase price as previously prescribed.*

In addition, Article 3.2 of Decree 144/2026 further clarifies that revenue from VATable goods and services used to determine the deductible input VAT allocation ratio also includes revenue from goods and services not required to be declared and for which VAT payment is not required (if any).

### 2.3 Clarification of conditions on VAT deduction for goods and services purchased on deferred or installment payment terms with a value of VND 5 million or more

Article 4 of Decree 144/2026 provides that where a business establishment purchases goods or services under deferred payment or installment payment with a value of VND 5 million or more, the business establishment shall rely on: (i) a written contract for the purchase of goods or services; (ii) a VAT invoice; and (iii) non-cash payment documents for such deferred or installment purchases, in order to claim input VAT deductions in the following cases:

- *Where the payment due date under the contract has not yet arrived and no non-cash payment document is available:* the business establishment is still entitled to deduct input VAT.
- *Where the payment due date has arrived but no non-cash payment document is available:* the business establishment must declare and make a downward adjustment to the input VAT previously claimed in respect of amounts for which payment documentation is unavailable. The adjustment must be made in the tax period in which the payment obligation arises under the contract or contract appendix.
- *Where non-cash payment documents are subsequently obtained after the downward adjustment:* the business establishment may make a supplemental declaration and re-claim the corresponding amount of input VAT in the tax period in which the non-cash payment documents arise.

### 3. Guidance on the Implementation of the Law on Artificial Intelligence

On April 30, 2026, the Government issued Decree No. 142/2026/NĐ-CP (“**Decree 142/2026**”) detailing a number of articles and measures for the implementation of the Law on Artificial Intelligence (“**AI**”). Decree 142/2026 takes effect from May 1, 2026 and applies to AI providers, developers, deployers, users of AI systems, and Vietnamese and foreign agencies, organizations, and individuals participating in AI-related activities in Vietnam.

Some notable provisions of Decree 142/2026 include:

#### 3.1 AI providers must classify AI systems before deployment

Decree 142/2026 requires AI providers to classify AI systems into three risk levels (high, medium, and low) before putting such systems into use. This classification requirement does not apply to standalone AI models, except where the AI model is used as a component of a specific AI system.

Where an AI system is modified, integrated, or has changes in functionality or intended purpose that alter its original risk level, the AI deployer must coordinate with the AI provider to review and reclassify the AI system.

For products, goods, or services integrated with AI systems, the classification of AI systems must not only comply with AI risk management requirements under AI laws, but also comply with sector-specific laws, technical standards and regulations, and product quality regulations applicable to the relevant products.

In addition, AI providers and deployers may use the automated risk classification support tool available on the AI one-stop electronic portal established by the Ministry of Science and Technology to conduct self-assessment and classification of their AI systems. The use of this tool is voluntary, serves only as a

support mechanism, and does not constitute an administrative approval procedure.

#### 3.2 High-risk AI systems must undergo conformity assessment before deployment

Under Articles 5.4 and 13 of Decree 142/2026, AI providers must conduct conformity assessments for high-risk AI systems before putting such systems into use through one of the following methods: (i) engaging a conformity assessment organization (*for high-risk AI systems included in the List of Artificial Intelligence Systems promulgated by the Prime Minister*); or (ii) conducting self-assessment or using the services of a conformity assessment organization (*for high-risk AI systems not falling under case (i) above*).

In addition, during the course of deployment, AI providers must reassess the conformity of the AI system whenever there are significant changes affecting the results of the initial conformity assessment.

#### 3.3 High- and medium-risk AI systems must have separate classification dossiers and submit classification results to the Ministry of Science and Technology

Pursuant to Articles 12 and 14 of Decree 142/2026, before deploying an AI system,

AI providers must prepare a risk classification dossier for AI systems classified as high-risk or medium-risk. The classification dossier includes basic documents and information regarding: (i) system identification; (ii) system description and usage context; (iii) data-related information; and (iv) the system's risk management mechanisms.

At the same time, AI providers must submit notification of the risk classification results to the Ministry of Science and Technology through the AI one-stop electronic portal in order to obtain an AI identification code. AI providers and deployers are responsible for retaining the risk classification dossier throughout the operational lifecycle of the AI system.

### **3.4 Personal data processing impact assessment dossier may be used as a substitute for or integrated into the risk classification dossier**

Under Article 12.7 of Decree 142/2026, where an AI system uses personal data, the AI provider may use the Personal Data Processing Impact Assessment Dossier prepared in accordance with personal data protection laws as a substitute for, or as an integrated component of, the risk classification dossier, with the aim of reducing administrative compliance costs.

### **3.5 Mandatory labelling requirements for certain AI-generated or AI-edited content**

Article 18.2 of Decree 142/2026 requires AI deployers to affix clear and recognizable labels to audio, images, or videos generated or edited by AI in the following two cases: (i) content simulating or imitating the appearance or voice of a real person; and (ii) content recreating real events in order to

distinguish such content from authentic content, unless otherwise provided by law.

AI deployers may choose one of the following four methods to display the label: (i) displaying the label directly on the content; (ii) displaying the label in the title, description, or caption accompanying the content; (iii) displaying the label on the interface of the content-providing platform; or (iv) providing an audio announcement or using another appropriate form of notification.

### **3.6 Obligation to report serious incidents**

Under Article 19 of Decree 142/2026, where an urgent serious incident involving an AI system occurs (*such as harm to human health or life; infringement upon human rights or the lawful rights and interests of agencies, organizations, or individuals; significant property damage or serious disruption to organizational operations; serious interruption to the provision of public or essential services; or impacts on national security, public order, or social safety*), the AI provider or deployer must submit a preliminary report through the AI one-stop portal within 72 hours from the time the incident is confirmed. For other serious incidents, the deadline for submitting the preliminary report is five working days from the date the incident is confirmed.

The submission of a preliminary report within the prescribed timeline shall not be construed as an admission of technical fault or legal liability by the reporting organization or individual. The deadline for submitting the official report on incident remediation results to the competent state authority is 15 days from the date of submission of the preliminary report.

Global Vietnam Lawyers would like to introduce our valued readers to an article by **Lawyer Ngo Thi Diem** titled **“Making share swap a tool to connect Vietnam’s capital market with the global market”** published in The Saigon Times, 19-2026 (1.847) on May 7, 2026.

*Share swaps have become a common transaction in mergers and acquisitions (M&A) deals and are no longer an unfamiliar concept in Vietnam’s dealmaking landscape. From a legal perspective, however, this transaction structure remains somewhat in a “gray area” and is in need of further consideration.*

Share swaps are increasingly being used in M&A transactions, particularly in large-scale deals, cross-border transactions, or transactions conducted for internal restructuring purposes. Instead of relying entirely on cash payments, the parties use shares or equity interests as a means of “exchanging value”, thereby reshaping ownership structures among enterprises.

Under Vietnam’s legal framework, the share swap structure still exists in a “gray area”: while it has been acknowledged in certain sectors, it has yet to be fully recognized as an independent legal concept — especially in the context of outbound investment activities. This raises an important question: is the current legal framework truly ready for share swaps,

or is it still struggling to keep pace with market practice?

### **Common share swap structures**

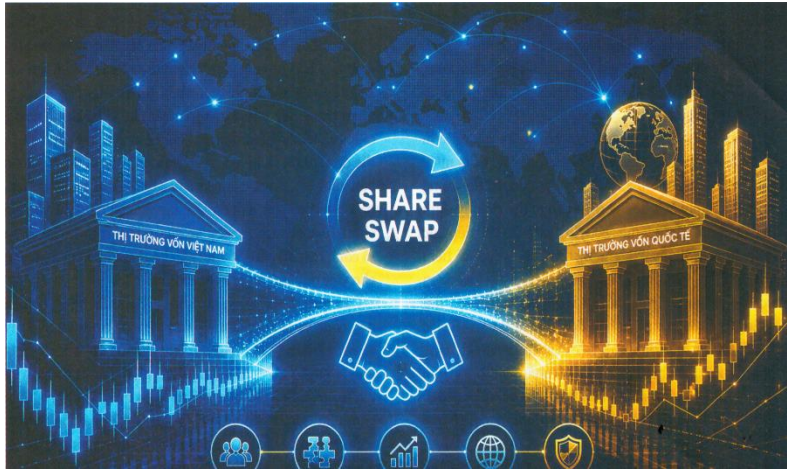
Under international practice, share swaps are not limited to shares in joint stock companies but are also widely applied to equity interests in other types of enterprises. At the core of this structure is the exchange of ownership rights rather than cash consideration.

Vietnamese laws on securities and investment — including outbound investment regulations — have gradually moved in this direction by recognizing the exchange of both shares and equity interests, regardless of the legal form of the enterprise involved. In practice, however, determining swap ratios is often tied to par value — a concept that exists only for shares. As a result, the involved parties in many cases are required to undertake intermediate restructuring steps (such as converting equity interests into shares) in order to facilitate the transaction.

In practice, share swaps typically take one of the two forms:

*First*, in M&A transactions. A company (referred to as Company A) seeks to acquire control of another company (referred to as Company B), not through cash payment but by using its own shares in exchange for the shares of Company B. Following the transaction, Company A becomes the controlling shareholder of Company B, while Company B’s shareholders become shareholders of Company A. This structure helps preserve cash flow while also aligning the parties’ long-term interests.

*Second*, in capital contribution transactions. An investor uses the shares he holds in one company as capital contribution into another company. As a result, a cross-ownership is established, under which the parties not only contribute capital but also participate in each other’s future growth. Regardless of the form, the common feature of share swaps is the absence of cash flow. This is both the structure’s greatest advantage and the origin of



many legal complications during implementation.

**Share swap: a “natural fit” for the securities sector**

Under Vietnam’s current legal framework, share swaps are most clearly recognized in the securities sector. The 2019 Securities Law and Decree No. 155/2020/NĐ-CP allow public companies (including listed companies) to issue shares in exchange for shares of another enterprise and to carry out M&A transactions through swap mechanisms.

Notably, the application scope of this arrangement is not limited to public companies. It may also extend to non-public companies, multi-member limited liability companies and, in certain cases, even the conversion of debt obligations into equity. It can be said that, within the securities sector, share swaps have been relatively well codified, with fairly clear

procedures, conditions and implementation requirements. This has provided an important legal foundation for enterprises to carry out swap transactions in practice.

**A step forward in outbound investment regulations**

A significant development came with the issuance of Decree No. 103/2026/NĐ-CP guiding the 2025 Law on Investment in relation to outbound investment. Building upon Decree No. 31/2021/NĐ-CP, Decree No. 103/2026/NĐ-CP reaffirms that shares and equity interests are among the lawful assets permitted for outbound investment purposes. Also, it takes a further step by recognizing share swaps as a permissible payment structure and by establishing fundamental principles for implementing transactions under this structure.

This marks an important advancement, partially eliminating the previous “gray area” in which share swaps existed in practice without a clear legal basis.

However, the issue remains that share swaps have yet to be formally defined as an independent legal concept, and are instead recognized only as a “payment method.” This leads to a lack of consistency when compared with the securities and corporate law framework.

**“No cash flow” – An advantage or a legal gap?**

The biggest bottleneck of share swaps in outbound investment today lies precisely in their defining feature: the absence of cash flow.

By nature, a share swap is effectively a “barter-style” transaction (shares exchanged for shares or equity interests), meaning that, in theory, there is no need for actual cross-border cash transfers. However, although Decree No. 103/2026/NĐ-CP recognizes the share swap structure, it still provides no specific guidance on exempting these transactions from the requirement to transfer funds through an outbound investment capital account

opened at a commercial bank.

Under the practical application of the earlier Decree No. 31/2021/NĐ-CP, the State Bank of Vietnam and licensed credit institutions have generally required actual cash inflows and outflows for reconciliation and verification purposes within the foreign exchange management system. Meanwhile, Decree No. 103/2026/NĐ-CP merely recognizes the value of swapped shares and equity interests as part of the total outbound investment capital, without adequately addressing how the parties can prove that capital contribution or payment obligations have been fulfilled in cases where no cash flow arises. Against this backdrop, a key legal question emerges: in the absence of actual cash transfers through the investment capital account, on what basis can banks certify that the investment capital has been contributed overseas, thereby providing the legal basis for recording, monitoring and ultimately permitting the repatriation of profits to Vietnam in accordance with foreign exchange regulations?

This ambiguity may continue to force enterprises engaging

in outbound investment transactions under the share swap structure – in the absence of more detailed guidelines on the implementation of Decree No. 103/2026/NĐ-CP – to resort to cumbersome processes carrying potential legal risks, similar to those seen in practice under the previous regulatory framework. Under such practice, investors are often required not only to complete registration procedures by entering into agreements concerning the asset swap arrangement, but also to work closely with commercial banks in order to have the swapped shares or equity interests recognized as outbound capital contributions, despite the fact that no foreign currency transfer actually takes place.

Notably, in many cases, commercial banks still appear reluctant to accept these “non-cash” investment structures. As a result, the parties involved are often compelled to arrange technical inflows and outflows of funds that merely simulate conventional share acquisition or capital contribution transactions, thereby eroding the core commercial benefits of the share swap structure.

### Proposed solutions

*First and foremost*, share swaps should be clearly defined through clarification of the following key issues:

*First, the scope of “share swap”*: A standalone legal definition should be introduced to clarify that a share swap is a transaction in which the consideration is not cash, but rather shares or equity interests in another enterprise.

*Second, conditions and procedures for application*: More detailed guidance should be issued to elaborate on the general principles currently set out under Decree No. 103/2026/NĐ-CP, including the applicable conditions and implementation procedures for share swap transactions. In particular, for share swap transactions involving shares of public companies (including listed companies), the legal framework governing share swaps should be developed and implemented in a manner that is consistent and aligned with the securities law.

*Third, the “cash flow” issue must be completely resolved*. For share swaps to operate effectively, the following principles should be clearly recognized: transactions conducted under a share

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swap structure should not be required to demonstrate actual cash flow, except in cases involving partial swaps – for example, where the transaction includes a cash adjustment component.

Finally, there should be a clear mechanism for recognizing swap ratios determined either under contractual agreements between the parties or based on independent valuation reports. In practice, swap ratios may be determined through agreements between the parties as recorded in transaction documents, taking into account financial indicators identified through due diligence processes, investment strategies, bargaining positions and long-term expectations. Depending on the nature of the transaction and the level of independence between the parties, valuation reports and independent opinions issued by financial advisory firms – particularly in material or public-interest transactions – may also serve as important reference sources for determining swap ratios.

However, Decree No. 103/2026/NĐ-CP currently provides no clear guidance as to the basis upon which regulators will recognize

swap ratios, and merely imposes the general requirement that transaction values be determined “in accordance with market principles.” This poses a risk that regulators may subsequently reassess transaction values through post-transaction audits, potentially giving rise to disputes relating to tax, transfer pricing or other financial obligations.

To address the above limitations, a clearer legal framework is needed: (i) recognizing swap ratios agreed upon by the transaction parties as the primary basis, provided that the parties are independent and there are no signs of evasion of legal obligations; and (ii) in more “sensitive” cases (such as public companies or related-party transactions), independent valuation reports may be required as a transparency safeguard, rather than as a mandatory condition for the validity of the transaction.

**Concluding remarks: From “tentative recognition” to “legal clarity”**

In practice, share swaps have been used in numerous cross-border M&A transactions, particularly those involving public

companies. However, most of these transactions have relied more on a “market precedent” than on a fully developed legal framework.

The formal recognition of share swaps under Decree No. 103/2026/NĐ-CP is therefore a welcome step forward. But for this structure to truly become workable in practice, a further step is needed – moving from principle-based recognition to recognition supported by clear operational mechanisms.

As Vietnam continues to promote financial integration and encourage domestic enterprises to expand into international markets, share swaps should not be viewed merely as a technical transaction tool. With a more complete legal framework, they could become an important lever enabling Vietnamese enterprises to pursue cross-border M&A transactions more flexibly, attract foreign investment capital and gradually integrate more deeply into the global financial ecosystem.

The remaining question is whether Vietnam is prepared to move from “tentative recognition” to “unequivocal legal acceptance”.

## LEGAL GUIDANCE

### 1. Guidance on determining deductible expenses for the calculation of the qualified domestic minimum top-up tax

In cases where expenses on in-kind rewards for employees, as well as allowances and welfare benefits for employees' children, families, and relatives, satisfy the conditions specified in Point 6.2, Section II, Appendix II of Decree No. 236/2025/ND-CP, such expenses shall be recognized as valid salary expenses and can be included in the deductible payroll value when calculating the corporate income tax top-up under the global minimum tax regulations.

*Tax Department replies to the question of Bac Ninh Tax Office in Official Letter No. 2697/CT-CS dated April 28, 2026.*

### 2. Invoice issuance timing for the supply of materials and equipment associated with construction and installation activities

Where a contract between parties involves the supply of materials and equipment in connection with construction and installation works, the invoice issuance timing shall be determined separately for each goods and service as follows:

- For goods: The invoice must be issued at the time the ownership of or the right to use the goods is transferred to the buyer, regardless of whether payment has been received.
- For construction and installation activities: The invoice must be issued at the time of acceptance and

handover of the completed work, work item, or completed construction and installation volume, regardless of whether payment has been received.

*Tax Department replies to the question of Ha Tinh Tax Office in Official Letter No. 3047/CT-CS dated May 14, 2026.*

### 3. Tax policy on airfare and hotel expenses for foreigners

- Personal Income Tax (PIT): Where a company incurs airfare and hotel expenses for foreign individuals traveling to Vietnam to support the company's production and business activities, such expenses shall be treated as taxable income for PIT purposes. The Company is responsible for withholding PIT from the individual in accordance with regulations.

- Foreign Contractor Tax (FCT): Where the Company pays certain expenses (such as airfare and hotel costs) for foreign individuals, if these expenses are determined to be payments made by the Vietnamese party on behalf of a foreign contractor, then these expenses shall be treated as the revenue subject to foreign contractor tax in accordance with Article 9.4 of Circular No. 69/2025/TT-BTC and Article 7.3 of Circular No. 20/2026/TT-BTC.

*Hung Yen Tax Office replies to the question of Tanaka Precision Vietnam Co., Ltd in Official Letter No. 5466/HYE-QLDN2 dated April 22, 2026.*

#### 4. Corporate income tax incentives for new investment projects and expansion investment projects

Where a company undertakes an investment project to develop an active project, such as expanding production scale, increasing capacity, or upgrading production technology (an expansion investment project), and satisfies the incentive conditions regarding location, business sector, and at least one of the following three criteria prescribed under Decree No. 218/2013/ND-CP and Article 10.4 of Circular No. 96/2015/TT-BTC: then the expansion investment project shall be eligible for corporate income tax (CIT) incentives in accordance with regulations.

Where the Company only invests in upgrading, replacing, or innovating the technology of an existing project located in an incentivized sector or area under Decree No. 218/2013/ND-CP, but does not satisfy any of the three criteria applicable to expansion investment projects, the applicable CIT incentives (if any) shall continue to follow those of the existing operating project for the remaining incentive period (if any).

*Tax Department replies to the question of Hai Phong Tax Office in Official Letter No. 3006/CT-CS dated May 13, 2026.*



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## GOOD READINGS FOR YOU

### 1. Proposal to allow enterprises implementing PPP projects to issue bonds

The Ministry of Finance has proposed easing the conditions for public bond issuance for enterprises implementing public-private partnership (PPP) projects, as part of an effort to expand long-term capital mobilization channels for large-scale infrastructure projects.

According to a draft decree recently submitted to the Government, PPP enterprises would no longer be subject to strict requirements regarding operating history or profitability, unlike ordinary businesses. Instead, regulators would focus on supervising the legal validity of project contracts, borrowing limits, payment guarantee mechanisms, and credit ratings.

For projects that have not yet commenced operations, any bonds issued must be backed by an unconditional payment guarantee from a qualified credit institution or financial organization. The Ministry of Finance believes that current regulations are not well suited to the specific characteristics of the PPP model, especially as many infrastructure projects still rely heavily on bank credit and

require additional medium- and long-term funding from the bond market.

According to the drafting committee, many countries around the world have implemented measures to promote capital mobilization for key infrastructure projects, such as facilitating infrastructure bond issuance, developing infrastructure investment funds, and offering tax incentives to institutional and individual investors participating in infrastructure bonds or infrastructure investment funds.

Therefore, studying and developing regulations on public bond offerings tailored to the characteristics of PPP enterprises is considered highly important for deepening the capital market, promoting effective mobilization of social resources for infrastructure investment, and contributing to the achievement of socio-economic development goals and national infrastructure development strategies in the coming period. The matter is seen as both necessary and urgent.

*Source: vtv.vn*

### 2. Proposal to unify specialized inspection under a single authority

The Ministry of Finance has assigned the Customs Department to develop a proposal for unifying specialized inspection activities under a single customs authority at border gates, aiming to reduce overlapping inspections and improve cargo clearance efficiency.

Accordingly, the Customs Department has proposed a new model in which businesses would only need to submit a

single set of documents through the electronic customs system and the National Single Window mechanism, instead of submitting documents to multiple agencies as currently required.

Under this model, the customs authority would serve as the focal point for receiving specialized inspection dossiers, coordinating with conformity assessment organizations and testing laboratories, and

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relying on inspection results to carry out customs clearance procedures.

The model is expected to help businesses reduce the number of declarations, minimize points of contact with authorities, shorten customs clearance times, and lower compliance costs. The

implementation roadmap is expected to consist of two phases: Priority implementation at land border checkpoints with China; and subsequent expansion to railway, seaport, and airport border gates.

*Source: vto.vn*



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## NEWLY ISSUED LEGAL DOCUMENTS

No.	Document title	Issuance date	Effect-ive date
<b>NATIONAL ASSEMBLY</b>			
1	Law amending and supplementing a number of articles of the Law on Personal Income Tax, the Law on Value Added Tax, the Law on Corporate Income Tax, and the Law on Special Consumption Tax, No. 09/2026/QH16.	April 24, 2026	April 24, 2026
2	Resolution No. 31/2026/QH16 on the first session of the 16th National Assembly.	April 24, 2026	June 8, 2026
3	Resolution No. 29/2026/QH16 on special mechanisms and policies for handling violations of land laws by organizations and individuals occurring before the 2024 Land Law took effect, and for resolving difficulties and obstacles for long-delayed and unresolved projects.	April 24, 2026	May 1, 2026
4	Law amending and supplementing a number of articles of the Law on Notarization, No. 04/2026/QH16.	April 23, 2026	January 1, 2027
5	Law on Access to Information, No. 01/2026/QH16.	April 23, 2026	September 1, 2026
<b>GOVERNMENT</b>			
1	Decree No. 152/2026/NĐ-CP detailing a number of articles and measures for the implementation of the Law on Civil Judgment Enforcement.	May 13, 2026	July 1, 2026
2	Decree No. 147/2026/NĐ-CP guiding the implementation of special mechanisms and policies for resolving difficulties and obstacles related to long-delayed and unresolved projects as prescribed in Resolution No. 29/2026/QH16 of the National Assembly.	May 7, 2026	May 7, 2026
3	Decree No. 144/2026/NĐ-CP amending and supplementing a number of articles of Decree No. 181/2025/NĐ-CP detailing the implementation of certain provisions of the Law on Value Added Tax, as amended and supplemented by Decree No. 359/2025/NĐ-CP.	May 5, 2026	June 20, 2026
4	Decree No. 142/2026/NĐ-CP detailing a number of articles and measures for the implementation of the Law on Artificial Intelligence.	April 30, 2026	May 1, 2026
5	Decree No. 141/2026/NĐ-CP amending and supplementing a number of articles of Decree No. 68/2026/NĐ-CP on tax policies applicable to household businesses and individual businesses, and Decree No. 320/2025/NĐ-CP detailing certain articles and measures for organizing and guiding the implementation of the Law on Corporate Income Tax.	April 29, 2026	January 1, 2026
<b>PRIME MINISTER</b>			

## NEWLY ISSUED LEGAL DOCUMENTS

1	Decision No. 804/QĐ-TTg issuing the List of datasets serving the development of artificial intelligence in essential sectors.	May 6, 2026	May 6, 2026
2	Decision No. 21/2026/QĐ-TTg issuing the List of strategic technologies and the List of strategic technology products.	April 30, 2026	July 1, 2026
<b>MINISTRY OF FINANCE</b>			
1	Circular No. 55/2026/TT-BTC stipulating forms of documents and reports related to investment activities in Vietnam and investment promotion.	May 15, 2026	May 15, 2026
2	Circular No. 48/2026/TT-BTC providing guidance on monitoring transactions of greenhouse gas emission quotas and carbon credits on the domestic carbon exchange, and the reporting regime of the Stock Exchange and the Vietnam Securities Depository and Clearing Corporation to the State Securities Commission regarding the operation of the domestic carbon trading platform.	May 12, 2026	May 12, 2026
3	Circular No. 44/2026/TT-BTC stipulating templates for investment monitoring and evaluation reports; online reporting regimes; and the management and operation of the information system for investment monitoring and evaluation.	April 22, 2026	April 22, 2026
4	Official Letter No. 5427/BTC-DNTN on the registration for establishment of economic organizations by foreign investors.	April 29, 2026	April 29, 2026
<b>MINISTRY OF INDUSTRY AND TRADE</b>			
1	Circular No. 24/2026/TT-BCT stipulating the rules of origin for goods under the Comprehensive Economic Partnership Agreement between the Government of the Socialist Republic of Vietnam and the Government of the United Arab Emirates.	May 5, 2026	May 5, 2026
<b>MINISTRY OF FOREIGN AFFAIRS</b>			
1	Circular No. 03/2026/TT-BNG stipulating the delegation of authority for consular certification and legalization to provincial-level People's Committees.	May 6, 2026	May 9, 2026

# 2026



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