

VIETNAM TAX SYSTEM

越南税收制度

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Dr. Dung is a Doctor of Economic Law in Vietnam and a legal consultant with over 13 years of experience, supporting investors from more than 20 countries such as the USA, Singapore, Japan, South Korea, China, among others, in directly advising and resolving legal and financial difficulties for foreign-invested projects in Vietnam. She has advised many large corporations such as Lotte, Samsung, Haidilao, CEO Suite, et cetera, and is an expert in the field of contracts, investment, dispute resolution, and mergers and acquisitions. In addition, she is one of the very few lawyers to have obtained an Investment Fund Certificate issued by the State Securities Commission.

黎律师是越南经济法博士，同时也是一位拥有13年以上经验的法律顾问律师。黎律师曾为来自美国、新加坡、日本、韩国、中国等20多个国家的投资者提供直接法律咨询，并协助解决在越南外国投资项目法律框架和财务的障碍。黎律师曾为乐天、三星、海底捞、CEO Suite等众多大型企业提供法律咨询服务。她是合同、投资、争议解决及企业并购领域的专家。此外，黎律师是少数成功获得越南国家证券委员会颁发的基金从业资格证的律师之一。黎律师曾长期担任越南JB证券公司的监察员。



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Dr. Dung has served as a supervisor of JB Vietnam Securities Company for a long time. Currently, she is the managing lawyer at Siglaw Firm. At the same time, she is also a legal consultant for the Korean Business Association in Vietnam (KoCham), the Guangdong-China Business Association (GDBAV) and is currently the Head of the International Law Department at Phenikaa University. With in-depth knowledge and practical experience, she is one of the leading legal experts on investment in Vietnam today.

目前，她是Siglaw律师事务所的首席律师，同时也是越南韩国商会（KoCham）、越南广东商会（GDBAV）的法律顾问。此外，她还担任Phenikaa大学国际法系的学科负责人。凭借深厚的专业知识和丰富的实践经验，黎律师是当前越南投资法律领域的顶级专家之一。



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1- INTRODUCTION

- Enterprises and investors in Vietnam are affected by the following taxes:
 - Corporate income tax (CIT)
 - Personal income tax (PIT) for Vietnamese and foreign employees
 - Value added tax (VAT)
 - Foreign contractor tax
 - Taxes deducted at source
 - Capital gains tax
 - Import tax
 - Social insurance, health insurance, unemployment insurance

1 - 简介

- 在越南经营的企业和投资者需承担以下税种：
 - 企业所得税（CIT）
 - 个人所得税（PIT）（适用于越南及外国员工）
 - 增值税（VAT）
 - 外国承包商税
 - 预提税
 - 资本利得税
 - 进口税
 - 社会保险、医疗保险和失业保险



- In addition, certain activities may be affected by the following taxes:

- Special Consumption Tax (SCT)
- Resource Tax
- Real Estate Tax
- Export Tax

- 此外，部分特定行业或活动可能需缴纳以下税种：

- 特别消费税
- 资源税
- 房地产税
- 出口税



2 - CORPORATE INCOME TAX (CIT)

2.1. Tax Rates

- The standard corporate income tax (CIT) rate in Vietnam is 20%.
- For certain industries or specific businesses, higher or lower tax rates may apply.

2.2. Tax Incentives

- Certain special sectors, industries and geographical areas may enjoy tax incentives, including:
 - Reduced CIT rates for a certain period of time or the entire duration of the project.
 - Exemption or reduction of CIT for the first few years of operation.
 - Enterprises operating in the fields of high technology, software production, research and development (R&D) may enjoy preferential CIT rates of 5% to 10% in some specific cases.

2 - 企业所得税 (CIT)

2.1. 税率

- 越南企业所得税 (CIT) 的标准税率为 20%。
- 某些特定行业或企业可能适用更高或更低的税率。

2.2. 税收优惠

- 部分行业、特定区域或特殊地理区域可享受税收优惠，包括：
 - 在一定期限内或整个项目期间 降低 CIT 税率。
 - 企业刚开始运营时，可 获得一定年限的 CIT 免税或减税。
 - 高科技、软件生产、研发 (R&D) 等行业可获得 5%-10% 的优惠 CIT 税率。

3 - PERSONAL INCOME TAX (PIT)

3.1. Taxpayers

- Resident individuals: Taxed on all global income.
- Non-resident individuals: Taxed only on income generated in Vietnam.

3.2. Tax rates

- Progressive tax from 5% - 35% on income from wages.
- Fixed tax rate from 0.1% - 20% on other types of income such as capital investment, asset.

3.3. Family deduction

- Individual: 11 million VND/month.
- Dependent: 4.4 million VND/person/month

3 - 个人所得税 (PIT)

3.1. 纳税人

- 居民个人：需缴纳全球范围内的所有收入所得税。
- 非居民个人：仅需对越南境内获得的收入缴税。

3.2. 税率

- 工资收入适用 5%-35% 的 累进税率。
- 资本投资、资产转让等其他收入 适用 0.1%-20% 的固定税率。

3.3. 个人所得税家庭扣除

- 个人： 1100万越盾/月。
- 受抚养人： 440万越盾/人/月。



4 - VALUE ADDED TAX (VAT)

4.1. Scope of application

Applicable to goods and services consumed in Vietnam.

4.2. Tax rates

- 0%: Exported goods and services.
- 5%: Some essential goods such as pharmaceuticals, medical equipment, clean water, education, books, etc.
- 10%: Standard tax rate applied to most goods and services.

4 - 增值税 (VAT)

4.1. 适用范围

适用于越南境内消费的商品和服务。

4.2. 税率

- 0%: 适用于 出口商品和服务。
- 5%: 适用于 药品、医疗设备、清洁水、教育、书籍等必需品。
- 10%: 标准税率 适用于 大部分商品和服务。



4.3. Goods and services not subject to VAT

- Goods and services provided by the state such as public education, public health, social insurance, finance, life insurance.
- Transfer of land use rights.
- Credit services, insurance, securities trading.

4.4. VAT Refund

- Exporting enterprises can request a tax refund if the uncredited input VAT is at least 300 million VND.
- New investment projects may be eligible for a VAT refund if they have not yet generated revenue and have uncredited input VAT.

4.3. 免征 VAT 的商品和服务

- 政府提供的服务（如公立教育、公共医疗、社会保险、金融保险、人寿保险等）。
- 土地使用权转让。
- 信贷、保险和证券交易服务。

4.4. 增值税退税

- 如果出口企业尚有未抵扣的进项税额达到或超过3亿越南盾，可以申请增值税退税。
- 新投资项目如尚未产生营业收入，且已有未抵扣的增值税进项税额，可申请增值税退税。

5 - FOREIGN CONTRACTOR TAX (FCT)

5.1. Scope of application

- Applicable to foreign enterprises without a commercial presence in Vietnam but with income from Vietnam.

5.2. Applicable tax rates

- Dividends: 5%
- Loan interest: 5%
- Royalties: 10%
- Services: 5%-10% (depending on the industry)

5 - 外国承包商税 (FCT)

5.1. 适用范围

- 适用于在越南没有商业存在但有收入的外国企业。

5.2. 适用税率

- 股息： 5%
- 贷款利息： 5%
- 特许权使用费： 10%
- 服务： 5%-10%（具体税率取决于行业）



5.3. Tax declaration and payment methods

- Foreign contractors can choose one of three tax declaration methods:
 - 1. Direct deduction method: Vietnamese enterprises deduct and pay taxes on behalf of foreign contractors.
 - 2. Direct declaration method: Contractors declare taxes themselves to the Vietnamese tax authority.
 - 3. Combined method: Combination of the above two methods.

5.3. 申报和缴税方式

- 外国承包商可选择以下三种方式之一：
 - 1. 直接扣缴法：越南企业代扣代缴外国承包商的税款。
 - 2. 直接申报法：外国承包商自行向越南税务机关申报纳税。
 - 3. 综合申报法：结合上述两种方法。

5.4. Taxation on e-commerce

- Vietnam has a mechanism to collect taxes from international e-commerce platforms such as Google, Facebook, Amazon.
- Foreign enterprises providing digital services in Vietnam must register for tax and declare taxes in Vietnam.

5.5. Double Taxation Avoidance Agreements

- Vietnam has signed double taxation avoidance agreements with more than 80 countries.
- Investors can enjoy tax incentives under the agreements if they meet the conditions.

5. 4. 电子商务税收

- 越南已实施电子商务税收管理机制，涵盖谷歌、脸书、亚马逊等国际平台。
- 外国企业提供数字服务 需在越南进行税务登记并纳税。

5. 5. 避免双重税收协定

- 越南已与 80多个国家 签订 避免双重税收协定。
- 投资者符合条件可 享受税收优惠。



6 - SPECIAL CONSUMPTION TAX (SCT)

6.1. Scope of application

Applicable to some goods and services to limit consumption such as:

- Alcohol, beer, cigarettes.
- Large-capacity cars and motorbikes.
- Casino and betting services.

6.2. Special consumption tax rate

- Strong alcohol (>20% alcohol): 65%.
- Beer: 65%.
- Tobacco: 75%.
- Cars with less than 9 seats: 35%-150% depending on engine capacity.
- Casino services, betting: 30%.



6 – SPECIAL CONSUMPTION TAX (SCT)

6.1. 适用范围

适用于 限制消费的商品和服务，包括：

- 酒精、啤酒、香烟。
- 大排量汽车、摩托车。
- 赌场、博彩服务。

6.2. 特别消费税率

- 烈酒（酒精度 >20%）： 65%
- 啤酒： 65%
- 香烟： 75%
- 9座以下汽车： 35%-150%（视发动机排量而定）
- 赌场、博彩服务： 30%

6.3. Comparison of US import tariffs on China and US tariffs on Vietnam: Advantages and Disadvantages

6. 3. 美国对中国和越南的进口关税比较：优势与挑战

Factor/ 因素	Vietnam/越南	China/中国
Average tax rate	<ul style="list-style-type: none">• Average most-favored-nation tariff of 2.2%.• Steel and aluminum, 25%, tariff applicable to all countries.• Risk of being affected by plans to impose reciprocal tariffs, applying import tariffs on goods from other countries equivalent to the tariffs those countries are applying to US goods.	<ul style="list-style-type: none">• 20% tariffs on all goods from China starting March 4, 2025 (IEEPA Tariffs).• Additional tariffs ranging from 25% to 100%, specifically targeting products and materials from semiconductors, metals, electric vehicles, batteries, critical materials, medical devices, magnets, cranes, photovoltaic cells (Section 301).• End of “de minimis” preferences, duty-free for small-value goods (Suspension of Section 321 benefits).
平均税率	<ul style="list-style-type: none">• 最惠国税率平均为2. 2%• 钢铁和铝产品适用25%关税，适用于所有国家• 可能受到美国“对等关税”计划的影响。 <p>(如果其他国家对美国商品加征关税，美国也会对这些国家的商品征收相同或相近的关税)</p>	<ul style="list-style-type: none">• 自2025年3月4日起，所有来自中国的商品适用20%关税（IEEPA 关税）• 额外关税介于25%至100%，特别针对半导体、金属、电动车、电池、关键材料、医疗设备、磁铁、起重机、光伏电池等（301条款）• 取消“de minimis”优惠，即取消小额商品免税待遇（暂停适用321条款优惠）

Factor/ 因素	Vietnam/越南	China/中国
Advantages	<ul style="list-style-type: none">• Low tax rate, not affected by additional tax, competitive price.• Cheaper labor compared to China, especially in the garment, footwear, and electronics industries.• Bilateral and multilateral free trade agreements.• Attracting investment, aiming to become a manufacturing center.• Strategic geographical location, favorable for trade.	<ul style="list-style-type: none">• Large-scale production facilities, established supply chain.• Large workforce, possessing high technology and skills.• Developed infrastructure, effective logistics support.• Long-term export experience.
优势	<ul style="list-style-type: none">• 关税低，未受额外关税影响，价格更具竞争力• 劳动力成本较低，特别是在服装、鞋类、电子产业• 参与多项双边及多边自由贸易协定• 吸引投资，正努力成为全球制造业中心• 地理位置战略性优越，适合国际贸易	<ul style="list-style-type: none">• 大规模生产基地，供应链已建立• 庞大劳动力市场，具备高科技和技能优势• 基础设施完善，物流支持高效• 长期出口经验，国际市场熟悉度高

Factor/ 因素	Vietnam/越南	China/中国
Disadvantage	<ul style="list-style-type: none">• Limited infrastructure, affecting production and transportation.• Production capacity cannot be compared with China, especially in heavy industries.• Pressure from the US on currency and origin of goods, beware of Chinese enterprises using Vietnam as a transit point to avoid taxes.• Dependent on Chinese raw materials, may be indirectly affected by the trade war.	<ul style="list-style-type: none">• High tax rates, more complicated calculation due to additional taxes.• Facing trade barriers from non-tariff measures, strict supervision.• Political risks and trade tensions and supply chain shifts.• US sanctions and restrictions, especially in the technology sector.
劣势	<ul style="list-style-type: none">• 基础设施较为有限，影响生产和运输效率• 生产能力仍难以与中国相比，尤其是在重工业领域• 面临美国在货币政策和原产地规则方面施加压力，需警惕中国企业通过越南进行转口贸易来规避关税• 高度依赖中国原材料，可能间接受到中美贸易战的影响。	<ul style="list-style-type: none">• 关税高，需额外计算附加税，税务计算更加复杂• 面临非关税贸易壁垒和高强度监管措施的挑战• 政治风险和贸易紧张局势，导致供应链可能被迫调整• 美国的制裁和限制政策，特别是在科技领域。

- China has competitive advantages in terms of production scale and infrastructure, but is facing disadvantages due to tariff policies and trade tensions from the United States.
- Vietnam, although having advantages in preferential tax policies and low production costs, has production capacity and dependence on imported raw materials that need to be improved.

- 中国在生产规模和基础设施方面具有竞争优势，但面临美国关税政策和贸易紧张局势带来的不利影响。
- 越南虽然享有税收优惠政策和较低的生产成本，但生产能力及对进口原材料的依赖仍需进一步改善。



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THANK YOU FOR LISTENING!

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