



TAX DEPARTMENT
HANOI TAX DEPARTMENT

No. 8238/QĐ-HAN-KTr3-XPHC

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

Hanoi, 2026

DECISION

On Administrative Penalties for Tax Violations

DIRECTOR OF THE HANOI TAX DEPARTMENT

Pursuant to Articles 57 and 68 of the Law on Handling of Administrative Violations;

Pursuant to the Law on Tax Administration No. 38/2019/QH14 dated 13 June 2019;

Pursuant to the Tax Laws, the Law on Fees and Charges, and documents amending, supplementing and guiding the implementation thereof;

Pursuant to Decree No. 125/2020/ND-CP dated 19 October 2020 of the Government providing for administrative sanctions for tax and invoice violations;

Pursuant to Decree No. 68/2025/ND-CP dated 18 March 2025 of the Government amending and supplementing a number of articles of Decree No. 118/2021/ND-CP dated 23 December 2021 of the Government detailing a number of articles and measures for implementation of the Law on Handling of Administrative Violations;

Pursuant to Decision No. 1376/QĐ-CT dated 30 June 2025 of the Director General of the Tax Department promulgating regulations on functions, duties, powers and organizational structure of provincial and municipal tax authorities under the Tax Department;

Pursuant to Decision No. 3736/QĐ-CT dated 31 December 2025 of the Director General of the Tax Department promulgating regulations on functions, duties and powers of the Office and divisions under provincial and municipal tax authorities;

Pursuant to the Tax Inspection Minutes dated 21 May 2026 conducted at Hanoi General Investment Joint Stock Company;

Pursuant to Decision No. 4189/QĐ-HAN dated 31 December 2025 of the Director of Hanoi Tax Department on delegation of authority to impose administrative penalties for tax and invoice violations;

Upon consideration of the proposal of the Head of Inspection Division No. 3 – Hanoi Tax Department.

DECIDES:

Article 1. Imposition of Administrative Penalties against the following organization:

1. Name of violating organization: Hanoi Investment General Corporation;

Tax code: 0102287094

Address: 36 Hoang Cau Street, O Cho Dua Ward, Hanoi;

Hanoi Investment General Corporation was issued Enterprise Registration Certificate No. 0102287094 for the first time on 30 March 2007 and amended for the 36th time on 07 August 2025.

Legal representative: Mr. Vu Thang – Gender: Male

Title: Director

2. Administrative violations committed:

- Regarding Value Added Tax (VAT): The Company declared input VAT credits based on invoices issued by entities not operating at their registered business addresses.

- Regarding Corporate Income Tax (CIT): The Company recorded expenses based on invoices issued by entities not operating at their registered business addresses and recorded income inconsistently with applicable regulations.

3. Aggravating circumstances: None

4. Mitigating circumstances: None

5. Penalties and remedial measures imposed:



a, Financial penalties:

- Penalty for incorrect tax declaration at the rate of 20% of the additional tax amount assessed through inspection in accordance with Point c, Clause 2, Article 138 of the Law on Tax Administration No. 38/2019/QH14 dated 13 June 2019 and Clause 1, Article 16 of Decree No. 125/2020/ND-CP dated 19 October 2020 of the Government due to incorrect declaration resulting in tax underpayment: VND 134,253,786 – TM 4254.

- Penalty for incorrect declaration in the related-party transaction appendix for 2022, imposed pursuant to Clause 1, Article 12 of Decree No. 125/2020/ND-CP dated 19 October 2020 of the Government; penalty amount: VND 1,000,000 – TM 4254.

*) Total penalties: VND 134,253,786 + VND 1,000,000 = VND 135,253,786 – TM 4254.

b, Remedial measures:

- Total tax arrears assessed through inspection: VND 671,268,932, including:

+ Value Added Tax (VAT): VND 83,165,644 – TM 1701 (2023: VND 82,089,564; 2024: VND 1,076,080).

+ Corporate Income Tax (CIT): VND 588,103,288 – TM 1052 (2022: VND 562,370,033; 2023: VND 23,253,459; 2024: VND 2,479,796).

- Late payment interest: VND 226,424,689 pursuant to Point a, Clause 2, Article 59 of Law No. 38/2019/QH14 dated 13 June 2019 on Tax Administration and Clause 2, Article 16 of Decree No. 125/2020/ND-CP dated 19 October 2020 of the Government due to late payment of taxes, specifically:

+ Late payment interest on VAT: VND 26,273,242 – TM 4931

+ Late payment interest on CIT: VND 200,151,447 – TM 4918

The above late payment interest has been calculated up to and including 26 May 2026. Hanoi General Investment Joint Stock Company is required to self-calculate and pay additional late payment interest from 27 May 2026 until the date immediately preceding the full payment date of overdue taxes into the State budget.

Total amount of tax arrears, penalties and late payment interest: VND 1,032,947,407 (*In words: One billion thirty-two million nine hundred forty-seven thousand four hundred and seven Vietnamese Dong*).

Article 2. This Decision shall take effect from the date of signing.

Article 3. This Decision shall be:

1. Delivered to Mr. Vu Thang, representative of Hanoi Investment General Corporation for implementation.

Within 10 days from the date of receipt of this Decision, Hanoi Investment General Corporation must strictly comply with this sanctioning decision and is responsible for paying the tax arrears, penalties and late payment interest specified in Article 1 into Account No. 7111 of State Treasury Region I (Tax administration authority: Hanoi Tax Department).

Upon expiration of the above-mentioned 10-day period, if Hanoi Investment General Corporation fails to voluntarily comply, enforcement measures shall be applied in accordance with law, and for each day of late payment, the organization shall additionally pay 0.05% calculated on the total outstanding tax amount.

Hanoi Investment General Corporation shall have the right to lodge complaints or initiate legal proceedings against this Decision in accordance with applicable laws.

2. Sent to State Treasury Region I for collection of penalties.

3. Sent to Inspection Division No. 3 and Enterprise Support Management Division No. 1 – Hanoi Tax Department for implementation./.



Recipients:

- As stated in Article 3;
- Archived at:
Administration Division;
Inspection Division No. 3
(03 copies) (DTNga).

**FOR THE DIRECTOR OF HANOI TAX DEPARTMENT
DEPUTY DIRECTOR OF HANOI TAX DEPARTMENT
(Signed)**

Nguyen Tien Minh

