

Tax Dispute Resolution Services

Defending Your Tax/Transfer Pricing Position - Why KPMG

Tax audit is top priority of the tax enforcement program administered by the Vietnamese authorities. The number of tax audit cases and corresponding tax collections have increased substantially, especially for matters related to indirect tax, transfer pricing and personal income tax. Further, tax regulations are becoming much more complicated and unclear, and the overall audit process can be overwhelming from the constant barrage of data requests and queries by the tax authorities. Consequently, many taxpayers end up settling unreasonably high taxes and penalties because they neither have sufficient resources to manage the overall tax audit, nor a clear strategy in defending their tax position. This can arise from not fully understanding the technical issues being challenged due to the changes and complexity referred to, and/or their rights and obligations during the tax audit proceedings

To ensure the best defense seeking support from professional tax advisors to determine the best strategy is a must. With the largest tax advisory practice in Vietnam, KPMG has unparalleled experience in tax dispute resolution across all industries.

How can we help

- 1** Review the tax filings for the audit period, the correspondence from the tax authorities, and advise on the potential risks and actions to be taken
- 2** Develop the strategy, including negotiation tactics, preparation of evidentiary documents, technical arguments to support your tax position
- 3** Participate in working meetings with the tax authorities to present your arguments and position
- 4** Review official documents, including tax minutes and decisions, and discuss with you the necessary and appropriate actions
- 5** Assist in any appeal process, if requested, where issues remain unresolved at the end of the tax audit.

By leveraging our experience from numerous tax audit cases, we will advise you the most practical and effective means to resolve your tax dispute. This means time and resources will be saved, and most importantly, the best outcome can be achieved.

KPMG National Tax Dispute Resolution (“TDRC”) Services team

A tax audit can be a prolonged process including examination, appeals, mutual agreement procedure, and litigation. In effectively handling those tax audits, most companies look to external experts who are familiar with dispute resolution processes and experience working with government personnel involved in these processes. At KPMG, we have a dedicated TDRC Services team comprising specialised experts with years of dispute resolution experience and close government relationships. KPMG recently expanded its TDRC team to add senior-level, former tax officers from the General Department of Taxation (“GDT”) and local tax authorities working on tax policies and tax disputes.

Contact us

Hoang Thuy Duong
Partner, Head of Tax

E dthoang@kpmg.com.vn

Nguyen Thu Huong
Partner, Head of TDRC

E hnguyen52@kpmg.com.vn

Le Thi Kieu Nga
Partner, Head of Corporate Tax

E nkle@kpmg.com.vn

Nhan Huynh
Partner, Head of Integrated
International Tax

E nnhuynh@kpmg.com.vn

Andrea Godfrey
Partner, Head of Global
Mobility Services

E andreagodfrey@kpmg.com.vn

Hanoi

46th Floor, Keangnam Landmark 72,
E6 Pham Hung, Me Tri, Nam Tu Liem
T +84 (24) 3946 1600

Ho Chi Minh City

10th Floor, Sun Wah Tower,
115 Nguyen Hue, Ben Nghe, District 1
T +84 (28) 3821 9266

Da Nang

Unit D3, 5th Floor, Indochina Riverside Towers,
74 Bach Dang, Hai Chau I, Hai Chau
T +84 (236) 351 9051

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

© 2023 KPMG Limited, KPMG Tax and Advisory Limited, KPMG Law Limited, KPMG Services Company Limited, all Vietnamese one member limited liability companies and member firms of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.



Scan to visit our website: kpmg.com.vn

Email: kpmghcmc@kpmg.com.vn