# Viet Nam

#### A. Progress in the implementation of the minimum standard

Viet Nam has 76 tax agreements in force, as reported in its response to the Peer Review questionnaire.

None of Viet Nam's agreements comply with the minimum standard or are subject to a complying instrument.

#### **B.** Implementation issues

No jurisdiction has raised any concerns about their agreements with Viet Nam.

Viet Nam is encouraged to implement the minimum standard in its agreements.

## Summary of the jurisdiction response – Viet Nam

|    | Treaty partners                           | Compliance with the standard | If compliant, the<br>alternative<br>implemented | Signature of a<br>complying<br>instrument | The alternative<br>implemented through<br>the complying<br>instrument<br>(if not the MLI) | Comments |
|----|---|------------------------------|---|---|---|----------|
| 1  | Australia                                 | No                           | N/A   | No  | N/A   |          |
| 2  | Austria                                   | No                           | N/A   | No  | N/A   |          |
| 3  | Azerbaijan*                               | No                           | N/A   | No  | N/A   |          |
| 4  | Bangladesh*                               | No                           | N/A   | No  | N/A   |          |
| 5  | Belarus*                                  | No                           | N/A   | No  | N/A   |          |
| 6  | Belgium                                   | No                           | N/A   | No  | N/A   |          |
| 7  | Brunei Darussalam                         | No                           | N/A   | No  | N/A   |          |
| 8  | Bulgaria                                  | No                           | N/A   | No  | N/A   |          |
| 9  | Cambodia                                  | No                           | N/A   | No  | N/A   |          |
| 10 | Canada                                    | No                           | N/A   | No  | N/A   |          |
| 11 | China (People's<br>Republic of)           | No                           | N/A   | No  | N/A   |          |
| 12 | Chinese Taipei*                           | No                           | N/A   | No  | N/A   |          |
| 13 | Croatia                                   | No                           | N/A   | No  | N/A   |          |
| 14 | Cuba*                                     | No                           | N/A   | No  | N/A   |          |
| 15 | Czech Republic                            | No                           | N/A   | No  | N/A   |          |
| 16 | Democratic People's<br>Republic of Korea* | No                           | N/A   | No  | N/A   |          |
| 17 | Denmark                                   | No                           | N/A   | No  | N/A   |          |
| 18 | Estonia                                   | No                           | N/A   | No  | N/A   |          |
| 19 | Finland                                   | No                           | N/A   | No  | N/A   |          |
| 20 | France                                    | No                           | N/A   | No  | N/A   |          |
| 21 | Germany                                   | No                           | N/A   | No  | N/A   |          |
| 22 | Hong Kong (China)                         | No                           | N/A   | No  | N/A   |          |
| 23 | Hungary                                   | No                           | N/A   | No  | N/A   |          |
| 24 | Iceland                                   | No                           | N/A   | No  | N/A   |          |
| 25 | India                                     | No                           | N/A   | No  | N/A   |          |
| 26 | Indonesia                                 | No                           | N/A   | No  | N/A   |          |

| 27 | Iran*                                   | No | N/A | No | N/A |  |
|----|---|----|-----|----|-----|--|
| 28 | Ireland                                 | No | N/A | No | N/A |  |
| 29 | Israel                                  | No | N/A | No | N/A | "Mini" PPTs<br>in Article 28   |
| 30 | Italy                                   | No | N/A | No | N/A |  |
| 31 | Japan                                   | No | N/A | No | N/A |  |
| 32 | Kazakhstan                              | No | N/A | No | N/A |  |
| 33 | Korea                                   | No | N/A | No | N/A |  |
| 34 | Kuwait*                                 | No | N/A | No | N/A |  |
| 35 | Lao People's<br>Democratic<br>Republic* | No | N/A | No | N/A |  |
| 36 | Latvia                                  | No | N/A | No | N/A |  |
| 37 | Luxembourg                              | No | N/A | No | N/A |  |
| 38 | Macau (China)                           | No | N/A | No | N/A |  |
| 39 | Malaysia                                | No | N/A | No | N/A |  |
| 40 | Malta                                   | No | N/A | No | N/A |  |
| 41 | Mongolia                                | No | N/A | No | N/A |  |
| 42 | Morocco                                 | No | N/A | No | N/A |  |
| 43 | Mozambique*                             | No | N/A | No | N/A |  |
| 44 | Myanmar*                                | No | N/A | No | N/A |  |
| 45 | Netherlands                             | No | N/A | No | N/A |  |
| 46 | New Zealand                             | No | N/A | No | N/A | "Mini" PPTs<br>in dividend,<br>interest,<br>royalty<br>Articles                    |
| 47 | Norway                                  | No | N/A | No | N/A |  |
| 48 | Oman                                    | No | N/A | No | N/A | "Mini" PPTs<br>in dividend,<br>interest,<br>royalty,<br>technical<br>fees Articles |
| 49 | Pakistan                                | No | N/A | No | N/A |  |
| 50 | Palestinian<br>Authority*               | No | N/A | No | N/A |  |
| 51 | Panama                                  | No | N/A | No | N/A |  |
| 52 | Philippines*                            | No | N/A | No | N/A |  |
| 53 | Poland                                  | No | N/A | No | N/A |  |
| 54 | Portugal                                | No | N/A | No | N/A | "Mini" PPT ir<br>1(c) of the<br>Protocol   |
| 55 | Qatar                                   | No | N/A | No | N/A |  |
| 56 | Romania                                 | No | N/A | No | N/A |  |
| 57 | Russia                                  | No | N/A | No | N/A |  |
| 58 | San Marino                              | No | N/A | No | N/A |  |
| 59 | Saudi Arabia                            | No | N/A | No | N/A |  |
| 60 | Serbia                                  | No | N/A | No | N/A |  |
| 61 | Seychelles                              | No | N/A | No | N/A |  |
| 62 | Singapore                               | No | N/A | No | N/A |  |
| 63 | Slovak Republic                         | No | N/A | No | N/A |  |
| 64 | Spain                                   | No | N/A | No | N/A |  |
| 65 | Sri Lanka                               | No | N/A | No | N/A |  |
| 66 | Sweden                                  | No | N/A | No | N/A |  |
| 67 | Switzerland                             | No | N/A | No | N/A |  |

| 68 | Thailand                | No | N/A | No | N/A |   |
|----|-------------------------|----|-----|----|-----|---|
| 69 | Tunisia                 | No | N/A | No | N/A |   |
| 70 | Turkey                  | No | N/A | No | N/A |   |
| 71 | Ukraine                 | No | N/A | No | N/A | "Mini" PPTs<br>in interest,<br>royalty<br>Articles    |
| 72 | United Arab<br>Emirates | No | N/A | No | N/A |   |
| 73 | United Kingdom          | No | N/A | No | N/A | "Mini" PPTs<br>in interest<br>and royalty<br>Articles |
| 74 | Uruguay                 | No | N/A | No | N/A |   |
| 75 | Uzbekistan*             | No | N/A | No | N/A | Mini" PPTs<br>in royalty<br>Articles                  |
| 76 | Venezuela*              | No | N/A | No | N/A |   |

## 274 |



# From: Prevention of Treaty Abuse – Second Peer Review Report on Treaty Shopping

Inclusive Framework on BEPS: Action 6

Access the complete publication at: https://doi.org/10.1787/d656738d-en

#### Please cite this chapter as:

OECD (2020), "Viet Nam", in *Prevention of Treaty Abuse – Second Peer Review Report on Treaty Shopping: Inclusive Framework on BEPS: Action 6*, OECD Publishing, Paris.

DOI: https://doi.org/10.1787/c925c8f4-en

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <u>http://www.oecd.org/termsandconditions</u>.

