

Representative Legal Matters

Thanh Hoa Dao

Tax Planning & Transaction

- Supported multinational companies on reviewing the tax incentive implications with respect to the proposed investment expansions by considering various options of the expansion plans and related tax incentive implications.
- Assisted multinational companies in conducting a tax DD, advising on the Vietnam tax implication, reviewing the SPA, negotiating, and assisting them to declare and paying tax in relation to the transaction.
- Advised world-leading e-commerce and digital services multinational companies on the status of e-commerce tax and assisted them in dealing with their local partners in relation to their Vietnam tax liabilities.
- Advised a global investment bank and financial services firm on Vietnamese tax implication on offshore trust structure, including their current tax matrix and all questions related to outbound investment and offshore trust structure.
- Advised an American multinational financial services company on Vietnam legal and tax implication to provide cross-border sale and purchase and goods for a number of their products.
- Advised an American multinational investment bank and financial services corporation on Vietnam tax implication of a number of business model on each party involved, including seller, buyers, e-commerce platform operator, banks, payment service provider, etc.
- Advised a Thai commercial bank on Vietnam tax implication on trading of NFTs on an e-commerce platform.
- Acted as the tax advisor for an international renewable energy company on their proposed acquisition of project companies that have been developing rooftop solar power projects on nationwide basis.
- Advised a Swiss-based multinational agricultural corporation on Vietnam capital gains tax issues related to their restructuring, conditions, and procedure to claim tax treaty protection.
- Advised leading renewable energy MNCs on tax planning for the development of renewable energy projects in Vietnam.
- Assisted a garment manufacturer with tax and legal matters with respect to their investments in Vietnam, including issues on direct and indirect taxes, and tax incentives.
- Advised a multinational conglomerate on the tax implication on their business plan of a wind project in Vietnam.

- Advised a multinational oil and gas company on market access and tax implications on their investments in Vietnam.
- Advised a multinational oil and gas related services company on withholding tax issues.
- Advised multinational companies on tax issues for their M&A / restructuring activities.
- Advised a multinational bank on tax issues upon its restructuring of branches in Vietnam.
- Advised a multinational courier express company on Vietnamese tax issues related to agents' operation and their subsidiary in Vietnam.
- Advised some worldwide multilevel sales companies on multi-level sales and related tax issues in Vietnam.
- Advised a leading global healthcare products company on tax planning and issues related to their acquisition of a number of healthcare and food supplement products companies in Vietnam.
- Advised a multinational technology company on market entry legal requirements and general corporate tax.
- Assisted and advised a leading insurance company dealing with various stakeholders with respect to legal and tax issues arising from a regulatory inspection.
- Participated in advising petroleum companies on a potential assessment of capital gains tax on their indirect sales of shares.
- Advised a foreign PE fund in relation to capital gains tax issues for an offshore share purchase transaction.
- Assisted a consumer company in reviewing the whole business model and the validity of the tax treatment applied under the old regulations and assessing the sustainability of its solutions addressing both legal and tax feasibility.
- Advised an e-commerce travel site on tax issues and provided an analysis of Vietnam tax implications in relation to the client's business models.
- Assisted a world-leading OTA company in their high-level discussion with the Vietnamese tax authority with respect to the PE status of their operation in Vietnam.
- Assisted the client in negotiating a change in VAT regime with the government (2014) and advised them on VAT treatment of their main business activities.
- Advising a multinational company on restructuring of R&D functions and tax planning.

Tax Dispute

- Advised a multinational company on the dispute on tax incentives related to relocation of the business from one province to another province.
- Assisted a global transport and logistics company to initiate court litigation against a tax assessment on intercompany expenses.

- Assisted a global automobile manufacturer in responding to their counter party and local tax authorities in relation to challenges of local tax authorities on our client's eligibility for tax treaty protection with respect to a transaction completed in 2018.
- Assisted a major insurance company in advocacy process to defend against a tax assessment of around USD 40 million, which could negatively affect the client's business model in Vietnam and good international practice in the life insurance industry.
- Advised a leading oil & gas firm on the potential position of the tax authorities on the application of new regulation regarding capital gains tax on indirect transfer of participating interest in petroleum contracts over past contracts, and developed defense to the tax authorities' possible assessment.
- Assisted a large integrated resort project in a tax appeal against a value added tax refund.
- Advised a number of European and Asian construction companies on tax issues related to performance of projects in Vietnam.
- Assisted a multinational company in an income tax dispute case involving their branch in Vietnam.

Tax Policy

- Assisted various tech companies engaging in e-commerce business or digital based economy to raise concerns and issues arising from draft legislations and to make recommendations to legislators.
- Attended to Project 30 of Prime Minister regarding administrative procedure reform.
- Participated in assisting the Vietnamese government in developing an auction mechanism for the solar industry in Vietnam.
- Assisted an international financial and development institution in conducting an analysis of Vietnam's tax legal framework with respect to debt trading activities.