CÔNG TY CỔ PHẦN ... VÀ XÂY LẮP ... TRƯỜNG SƠN

TAX DEPARTMENT
NINH BINH PROVINCIAL TAX DEPARTMENT

No.: 2193/QĐ-NBI

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

Ninh Binh, August 24, 2026

DECISION
On Sanctioning Administrative Violations

HEAD OF NINH BINH PROVINCIAL TAX DEPARTMENT

Pursuant to Articles 57, 68, 70, 78 and 85 of the Law on Handling Administrative Violations dated June 20, 2012; the Law Amending and Supplementing a Number of Articles of the Law on Handling Administrative Violations dated November 13, 2020; the Law Amending and Supplementing a Number of Articles of the Law on Handling Administrative Violations dated June 25, 2025;

Pursuant to the Law on Tax Administration and its guiding documents;

Pursuant to the Laws on Taxes, the Law on Fees and Charges, and their guiding documents;

Pursuant to Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government prescribing administrative penalties for tax and invoice-related violations; Decree No. 310/2025/ND-CP dated December 2, 2025 of the Government amending and supplementing a number of articles of Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government; Decree No. 118/2021/ND-CP dated December 23, 2021 of the Government; Decree No. 68/2025/ND-CP dated March 18, 2025 of the Government amending and supplementing a number of articles of Decree No. 118/2021/ND-CP dated December 23, 2021 of the Government;

Pursuant to Decree No. 189/2025/ND-CP dated July 1, 2025 of the Government detailing the Law on Handling Administrative Violations regarding the authority to impose administrative penalties;

Pursuant to Decision No. 1376/QD-TCT dated June 30, 2025 of the Tax Department prescribing the functions, duties, powers and organizational structure of provincial and municipal Tax Departments under the Tax Department;

Pursuant to Decision No. 01/QD-NBI dated July 2, 2025 of the Head of Ninh Binh Provincial Tax Department on the assignment of areas of responsibility and units under the charge of the Leaders of Ninh Binh Provincial Tax Department; Decision No. 1500/QD-NBI dated September 30, 2025 of the Head of Ninh Binh Provincial Tax Department on the adjustment and supplementation of the assignment of areas of responsibility and units under the charge of the Leaders of Ninh Binh Provincial Tax Department;

Pursuant to Decision No. 3897/QD-NBI dated December 31, 2025 of the Head of Ninh Binh Provincial Tax Department on authorizing the signing of certain documents to the Deputy Heads of Ninh Binh Provincial Tax Department;

Pursuant to Decision No. 3895/QD-NBI dated December 31, 2025 of the Head of Ninh Binh Provincial Tax Department on authorizing the signing of documents *falling under the authority of the Head of Ninh Binh Provincial Tax Department;*

Pursuant to the recommendations set out in the Tax Inspection Minutes made on August 21, 2026 by the Inspection Team established under Decision No. 1660/QD-NBI dated July 8, 2026 of Ninh Binh Provincial Tax Department on conducting a tax inspection at Truong Son Investment and Construction Joint Stock Company;

At the proposal of the Head of Tax Inspection Division No. 2, Ninh Binh Provincial Tax Department.

DECISION:

Article 1

1. Imposition of administrative penalties on:

Truong Son Investment and Construction Joint Stock Company; Tax identification number: 0700210210; Address: Chau Son Industrial Park, Chau Son Ward, Ninh Binh Province.

Truong Son Investment and Construction Joint Stock Company is a joint stock company operating under Enterprise Registration Certificate No. 0700210210, first registered on August 29, 2002, and registered for its 18th amendment on August 12, 2025, issued by the Department of Finance of Ninh Binh Province.

- Legal representative: Mr. Nguyen Van Truong
- Gender: Male.
- Title: Chairman of the Board of Directors

Scope of inspection: Value-added tax (VAT), corporate income tax (CIT), personal income tax (PIT), and the management and use of invoices.
Inspection period: 2023, 2024 and 2025.

2. Committed violations of the provisions of Clause 2 and Clause 5, Article 17 of the Law on Tax Administration No. 38/2019/QH14 dated June 13, 2019, as amended by Clause 4, Article 6 of Law No. 56/2024/QH15 dated November 29, 2024; Clause 6, Article 1 of Law No. 31/2013/QH13 dated June 19, 2013 amending and supplementing a number of articles of the Law on Value-Added Tax; Clause 1, Article 15 of Circular No. 219/2013/TT-BTC dated December 31, 2013 (as amended by Clause 10, Article 1 of Circular No. 26/2015/TT-BTC dated February 27, 2015); Clauses 1 and 3, Article 14 of Law No. 48/2024/QH15 dated November 26, 2024 on Value-Added Tax; Clause 5, Article 1 of Law No. 32/2013/QH13 dated June 19, 2013 amending and supplementing a number of articles of the Law on Corporate Income Tax (as amended by Clause 3, Article 1 of Law No. 71/2014/QH13 dated November 26, 2014 amending the Tax Laws 2014); and Clauses 1 and 5, Article 10 of Decree No. 320/2025/ND-CP dated December 15, 2025 of the Government.

3. Administrative penalties:

+ Penalty for the act of making incorrect tax declarations resulting in an underpayment of VAT and CIT, in accordance with Clauses 1 and 2, Article 16 of Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government.

+ For the act of making incorrect tax declarations that does not result in a shortage of tax payable but increases the amount of tax exempted or reduced or the amount of tax not yet refunded, with respect to the 2023 VAT tax return, the statute of limitations for imposing administrative penalties for tax violations has expired, in accordance with Articles 6 and 65 of the Law on Handling Administrative Violations No. 15/2012/QH13 dated June 20, 2012 (as amended and supplemented by Law No. 67/2020/QH14 dated November 13, 2020) and Clause 2, Article 8 of Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government (as amended by Point b, Clause 6, Article 1 of Decree No. 310/2025/ND-CP of the Government).

4. Aggravating circumstances in tax matters: None.

5. Mitigating circumstances: None.

6. The following penalties and remedial measures shall be imposed:

a. a. Primary penalty:

Administrative penalty for tax violations: Fine, with a total penalty amount of 29.969.568 VND, comprising:

- The act of making incorrect tax declarations resulting in an underpayment of CIT for 2023, 2024 and 2025, in the amount of 29.416.993 VND;
- The act of making incorrect tax declarations resulting in an underpayment of VAT for 2024 and 2025, in the amount of 552.575 VND.

b. Additional penalties: None

c. Remedial measures:

- Collection of underpaid VAT: 2.762.873 VND. Of which: 1.121.273 VND for 2024 (July 2024 tax declaration period) and 1.641.600 VND for 2025 (December 2025 tax declaration period).
- Collection of underpaid CIT: VND 147.084.965, comprising: 1.371.636 VND for 2023; 48.387.409 VND for 2024; and 97.325.920 VND for 2025.

On August 21, 2026, the Company voluntarily paid the full amount of underpaid taxes to the State Treasury by electronic payment.

- Late payment interest on the underpaid tax amount: 12.091.814 VND (twelve million ninety-one thousand eight hundred fourteen Vietnamese dong). Of which: late payment interest on VAT is 227.185 VND; late payment interest on CIT is 11.864.629 VND.

The above late payment interest is calculated through August 20, 2026, in accordance with Clause 2, Article 16 of the Law on Tax Administration No. 108/2025/QH15 dated December 10, 2025; and Clause 2, Article 26 of Decree No. 252/2026/ND-CP dated June 30, 2026 of the Government.

The time limit for implementation of the remedial measures is 10 (ten) days from the date of receipt of this Decision.

Other matters directly related to the implementation of the remedial measures (if any): None.

All costs incurred in organizing the implementation of the remedial measures shall be borne by Truong Son Investment and Construction Joint Stock Company, the penalized entity named in this Article (if any).

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

Article 3. This Decision shall be:

1. Delivered to Mr. Nguyen Van Truong, the legal representative of Truong

Son Investment and Construction Joint Stock Company, the penalized entity named in Article 1 of this Decision, for compliance.

Truong Son Investment and Construction Joint Stock Company named in Article 1 shall strictly comply with this Decision on administrative penalties. If, upon expiry of the prescribed time limit, Truong Son Investment and Construction Joint Stock Company fails to voluntarily comply, compulsory enforcement shall be carried out in accordance with the law, and for each day of late payment of the fine, Truong Son Investment and Construction Joint Stock Company shall pay an additional 0.05% of the total outstanding fine amount.

a) Truong Son Investment and Construction Joint Stock Company, the penalized entity named in Article 1, shall pay the fine at State Treasury Region V or pay the fine into the account of a commercial bank where State Treasury Region V maintains an account, using the following information for payment into the State Budget:

- State Budget Revenue Account: 7111;
- Chapter Code: 554;
- Economic Content Code:

+ Sub-item 4254: 29.969.568 VND.
+ Sub-item 4931: 227.185 VND.
+ Sub-item 4918: 11.864.629 VND.

within 10 (ten) days from the date of receipt of this Decision..

b) Truong Son Investment and Construction Joint Stock Company has the right to lodge a complaint or initiate administrative legal proceedings against this Decision in accordance with the law.

2. To be sent to State Treasury Region V for collection.
3. To be sent to the Head of Tax Inspection Division No. 2 for organizing the implementation of this Decision.
4. To be sent to the Head of Enterprise Management and Support Division No. 3 for information and coordination in implementation./.

Recipients:

- As stated in Article 3;
- Head of Ninh Binh Provincial Tax Department (for reporting);
- Filed at: Office, Tax Inspection Division No. 2, Tax Inspection Records.

ON BEHALF OF THE HEAD OF PROVINCIAL TAX DEPARTMENT
DEPUTY HEAD OF PROVINCIAL TAX DEPARTMENT

(Signed & Sealed)

Vu Đinh Hong