TAX DEPARTMENT OF HO CHI MINH CITY
TAX SUB-DEPARTMENT NO.2 OF HO CHI MINH CITY

No. 7361/QD-XPHC

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

Cat Lai, August 22, 2026

DECISION

On the Imposition of an Administrative Penalty

HEAD OF TAX SUB-DEPARTMENT NO. 2 OF HO CHI MINH CITY

Pursuant to Articles 57, 68, 70, 78, and 85 of the Law on Handling of Administrative Violations (as amended and supplemented in 2020);

Pursuant to the Law on Tax Administration No. 108/2025/QH15 dated December 10, 2025, and its guiding documents;

Pursuant to the Law on Tax Administration No. 38/2019/QH14 dated June 13, 2019, and its guiding documents;

Pursuant to the Law on Tax Administration dated November 29, 2006; the Law amending and supplementing a number of articles of the Law on Tax Administration dated November 20, 2012, and its guiding documents;

Pursuant to Article 6 of Law No. 56/2024/QH15 dated November 29, 2024, amending and supplementing a number of articles of the Law on Tax Administration;

Pursuant to the tax laws and their guiding documents;

Pursuant to Decree No. 125/2020/ND-CP dated October 19, 2020, of the Government, providing for penalties for administrative violations regarding taxes and invoices;

Pursuant to Decree No. 129/2013/ND-CP dated October 16, 2013, of the Government, providing for penalties for administrative violations regarding taxes and the enforcement of administrative tax decisions;

Pursuant to Decree No. 118/2021/ND-CP dated December 23, 2021, of the Government, detailing a number of articles of and measures to implement the Law on Handling of Administrative Violations;

Pursuant to 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 detailing a number of articles of and measures to implement the Law on Handling of Administrative Violations;

Pursuant to Decision No. 1377/QD-CT dated June 30, 2025, of the Director of the Tax Department, promulgating regulations on the functions, tasks, and powers of Tax Sub-Departments under Provincial/City Tax Departments;

Pursuant to Decision No. 3737/QD-CT dated December 31, 2025, of the Director of the Tax Department, prescribing the tax administration organizational model of Tax Sub-Departments;

Pursuant to the Tax Inspection Record dated August 21, 2026, made at the head office of SGI Holdings Investment Joint Stock Company;

DECISION:

Article 1. Imposition of an administrative penalty on the organization named below:

1. SGI Holdings Investment Joint Stock Company.

Head office address: 47 Street No. 17, Quarter 6, Hiep Binh Ward, Ho Chi Minh City.

Enterprise code: 0315205307.

Enterprise Registration Certificate No.: 0315205307

First issued on: August 6, 2018; issuing authority: Business Registration Office, Department of Planning and Investment of Ho Chi Minh City.

Legal representative: Nguyen Quoc Viet. Gender: Male.

Title: General Director.

Term: From 2018 to June 2026

2. Administrative violation(s) committed:

- Incorrect declaration that did not result in a shortfall in the amount of tax payable. Provided for under Article 141 of the Law on Tax Administration dated June 13, 2019.

3. Provided for under:

- Point b, Clause 3, Article 12 of Decree No. 125/2020/ND-CP dated October 19, 2020, of the Government, providing for penalties for administrative violations regarding taxes and invoices.

4. Aggravating circumstances: none.

5. Mitigating circumstances: none.

6. Circumstances related to the resolution of the violation: none.

7. Penalty form(s) and remedial measure(s) applied, as follows:

a) Principal penalty form: fine

Specifically: VND 6,500,000 (in words: six million five hundred thousand dong), of which:

- Penalty for incorrect declaration that did not result in a shortfall in the amount of tax payable (sub-item 4254) (procedural tax penalty): VND 6,500,000.

b) Additional penalty form: none

c) Remedial measure(s):

- Reduction of the deductible amount: VND 49,475,332 (in words: forty-nine million four hundred seventy-five thousand three hundred thirty-two dong).

SGI Holdings Investment Joint Stock Company is requested to declare an adjustment of the above deductible tax amount in the value-added tax declaration dossier for the tax period in which this Decision is received (criterion/box 37 on the Value-Added Tax Declaration Form No. 01/GTGT).

Article 2. This Decision takes effect on the date of signing.

Article 3. This Decision shall be:

1. Delivered to Mr. Nguyen Quoc Viet, legal representative of SGI Holdings Investment Joint Stock Company, penalized as named in Article 1 of this Decision, for compliance.

SGI Holdings Investment Joint Stock Company, named in Article 1, must strictly comply with this penalty Decision. If, after the deadline, SGI Holdings Investment Joint Stock Company fails to voluntarily comply, it shall be subject to enforcement in accordance with law, and for each day of late payment of the fine, the violating individual/organization must pay an additional 0.05% calculated on the total unpaid fine amount.

SGI Holdings Investment Joint Stock Company, named in Article 1, must pay the fine at Transaction Office No. 1 – State Treasury of Region II, using the following state budget payment information:

Account No.: 7111.1141169; Code of the penalty-issuing authority: G12.18.79.790; within 10 days from the date of receipt of this Decision.

SGI Holdings Investment Joint Stock Company has the right to file an administrative complaint or lawsuit against this Decision in accordance with law.

2. Sent to the State Treasury of Region II for collection of the fine.

3. Sent to Business Support Management Team No. 3 for implementation of this Decision.

Recipients:
- As stated in Article 3;
- Filed: Administration Office, Tax Inspection Team 4
(ntkngan32,03b)

HEAD OF TAX SUB-DEPARTMENT
Pham Viet Anh
(Signed and Sealed)