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NON-DEDUCTIBLE EXPENSES FOR CORPORATE INCOME TAX CALCULATION

(Effective from 01st October 2025)

According to Clause 2, Article 9 of the Corporate Income Tax Law 2025

1 EXPENSES THAT ARE INELIGIBLE OR INVALID

- Expenditures **not fully satisfying the requirements** specified in Clause 1, Article 9 of the Corporate Income Tax Law 2025 (such as valid invoices, supporting documents, or business-related purposes…)
- **Fine** for administrative violations.
- **Expense already covered** by other funding sources.
- **Expenses not corresponding to assessable revenue**, except for the expenses specified in point b, clause 1 , Article 9 of the Corporate Income Tax Law 2025).

2 EXPENSES EXCEEDING REGULATORY LIMITS

Portions of expenses exceeding prescribed limits, including:

- **Allocation of business management costs** from foreign enterprises.
- Costs of management of gambling video game businesses and casinos.
- Payment of **interests on loans taken by enterprises with related-party transactions.**
- Direct payment of **benefits for employees.**
- **Voluntary insurance, supplementary pension, and life insurance** contributions for employees.

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3 PROVISIONS, DEPRECIATION, AND ACCRUED EXPENSES NOT MEETING ELIGIBILITY REQUIREMENTS

- **Provisions** made incorrectly or exceeding the limits set by the law regarding provisions.
- **Depreciation expense** for fixed assets that is incorrect or exceeds the limits prescribed by law.
- **Accrued expenses** not in accordance with regulations.

4 SALARY AND PAYROLL EXPENSES

- Wages and remunerations of owners of sole proprietorships, individual owners of single-member limited liability companies.
- Wages of founders that do not directly participate in business management.
- Wages, remunerations, and accounting expenses allocated for the employees that are not actually paid or are paid without invoices or payment documents as prescribed by law

5 NON-DEDUCTIBLE INTEREST EXPENSES

- Interest on loans corresponding to the portion of charter capital not yet contributed.
- Interest on loans during the investment process that have been recorded in investment value.
- Interest on loans used for the implementation of contracts for oil and gas exploration and exploitation.
- Interest on business loans of entities that are not credit institutions that exceed the limits prescribed by law.

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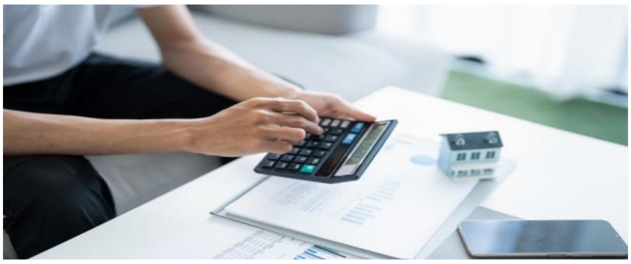
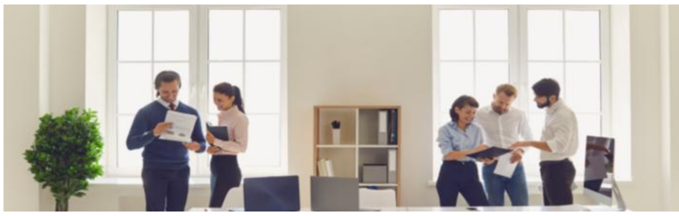


7 TAXES, FEES, AND CHARGES

- Input **VAT** that has been deducted; VAT payable using the credit-invoice method; input VAT on passenger cars with nine seats or fewer exceeding the limits prescribed by law;
- **Corporate income tax.**
- Other taxes, fees, charges, and levies that are not considered deductible expenses under the regulations.
- **Late payment interest** as stipulated by law.

6 SPONSORSHIP AND BASIC CONSTRUCTION INVESTMENT EXPENSES

- **Sponsorships**, except for those allowed under point b5, clause 1, Article 9 of the Corporate Income Tax Law 2025.
- **Expenses for basic construction investment during the investment phase** to form fixed assets; expenses directly related to increases or decreases in the enterprise's equity.



8 SPECIAL EXPENSES

- **Expenses allowed to be recovered** in excess of the ratio stipulated in the approved petroleum contract.
- **Expenses of business operations:** banking, insurance, lottery, securities, BT contracts, BOT contracts, and BTO contracts that are incorrect or exceed the prescribed limits.

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