

Stricter Accounting & Audit Enforcement in Vietnam:

Decree 132/2026/NĐ-CP

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New Administrative Penalties For Accounting and Independent Audits, Effective May 2026

On 6 April 2026, the Vietnamese Government issued Decree 132/2026/NĐ-CP, amending Decree 41/2018/NĐ-CP on administrative penalties in accounting and independent audit. The new Decree takes effect from 21 May 2026 and introduces several important changes that significantly impact how compliance risks are assessed and enforced against accounting and audit service providers in Vietnam.

The decree seeks to expand penalties for failures in customer due diligence, risk assessment, reporting, and internal controls, while also clarifying enforcement authority across government levels. Overall, it reflects a shift toward tighter regulatory enforcement, improved transparency, and closer alignment between accounting practices and broader financial compliance regimes in Vietnam.

What Has Changed?

The amendments are designed to reshape how violations are identified, investigated, and penalized in Vietnam.

Clearer rules on the statute of limitations for violations

The Decree clarifies when penalty periods start:

- For completed violations: counted from the date the violation ends
- For ongoing violations: counted from the date of detection

Importantly, these regulations now provides more detailed guidance on determining when a violation is considered "completed," based on actual accounting processes and corrective actions.

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A Shift Toward Stricter Accounting & Audit Enforcement

Commercial implications:

This reduces ambiguity and gives authorities more flexibility to pursue historical issues—meaning businesses can no longer rely on “timing gaps” as a risk buffer.

Expansion of authorities involved in enforcement

Clause 1 of the (new) Article 69 now refers to “this Decree” rather than specific articles, which is intended to ensure compatibility with the addition of new sanctioning authority so granted (such as the State Bank Inspectorate in Article 70a).

Enforcement is no longer centralized, increasing the probability of detection as more stakeholders are empowered to initiate administrative actions.

Revised and expanded sanctioning powers

Authorities at various levels (e.g., Departments of Finance, inspectors, local authorities) are granted clearer and, in some cases, expanded powers to impose penalties, confiscate evidence, and suspend licenses.

Comparison Table of Amendments to sanctioning powers

| Content | Decree 41/2018/ND-CP | Decree 132/2026/ND-CP | Key Changes |
|-----------------------------------|--|--|--|
| Sanctioning Authority | Sanctioning authority... of the Financial Inspectorate. | Sanctioning authority... of Heads of agencies performing specialized state management tasks and other titles. | Subject Change: Shifted from Inspectorate forces to leaders of specialized management agencies. |
| Authority to impose penalties | Financial Inspector: Only authorized to issue warnings. | Director of the Department of Finance: Authorized to fine up to 40,000,000 VND. | Upgraded the position/title and significantly increased the fine threshold. |
| Authority to impose penalties | Chief Inspector of the Dept. of Finance: Fines up to 25,000,000 VND. | Director General of the Accounting & Auditing Supervisory Authority (MoF): Fines up to 50,000,000 VND. | Transferred authority to a specialized Ministry-level Department with a higher maximum fine. |
| Inspection Team Leader (Clause 3) | Regulates the authority of the Chief Inspector of the Ministry of Finance. | Regulates the authority of the Inspection Team Leader (established by Ministry-level organizations or the Minister). | Decentralized power to Team Leaders, equivalent to a Director of Department or Director General depending on the level of establishment. |
| Confiscation of Exhibits | Value of exhibits must not exceed the fine amount (for Chief Inspector of Dept. of Finance). | No limit on the value of exhibits relative to the fine amount. | Expanded Authority: Removed the value cap on confiscating violating exhibits. |

Businesses may face faster and more decisive enforcement actions, reducing the time available to react once an issue is identified.

New penalties related to anti-money laundering (AML) compliance

A notable addition is the introduction of administrative penalties for violations related to AML requirements in accounting service businesses, including:

- Customer due diligence failures
- Risk assessment and classification issues

Penalties can apply even at relatively operational levels of non-compliance. Accounting is now directly linked to financial crime compliance, and no longer just about bookkeeping. This elevates the role of accounting functions and accounting service provision into a broader risk management framework.

What This Means for Businesses

From a commercial standpoint, Decree 132/2026/NĐ-CP signals three major shifts:

- Higher enforcement certainty: Clearer rules reduce interpretation gaps, increasing the likelihood of penalties
- Broader enforcement coverage: More authorities involved means more touchpoints for compliance checks
- Expanded risk scope: Compliance now extends beyond accounting accuracy to include AML and governance

For many companies, especially SMEs and fast-growing businesses, these changes can translate into:

- Unexpected financial exposure from historical issues
- Increased scrutiny during inspections or audits
- Greater pressure on internal accounting teams

Final Thoughts

Decree 132/2026/NĐ-CP reflects a broader regulatory trend: compliance is becoming more integrated, more enforceable, and more critical to business sustainability. Providers that act early will not only avoid penalties, but position themselves ahead of competitors who treat compliance as an afterthought.

For any further questions you may have, please reach out to us at vietnam@alitim.com


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