

**AVIATION IMPORT – EXPORT
JOINT STOCK COMPANY**

No.: 5001/2025/XNK-QLCD

Re: Information Disclosure

THE SOCIALIST REPUBLIC OF VIET NAM

Independence – Freedom – Happiness

Hà Nội, December 31, 2025

EXTRAORDINARY INFORMATION DISCLOSURE

To:

- State Securities Commission of Viet Nam
- Hanoi Stock Exchange

1. Disclosing organization

- Name: **AVIATION IMPORT – EXPORT JOINT STOCK COMPANY**
- Stock code: **ARM**
- Head office address: No. 414 Nguyen Van Cu Street, Bo De Ward, Ha Noi City, Viet Nam
- Telephone: +84 24 3827 1939 – 3827 1351
- Fax: +84 24 3827 1925

2. Contents of information disclosure

On December 30, 2025, Aviation Import – Export Joint Stock Company received **Decision No. 41502/QĐ-HAN-KTr2-XPHC** on **administrative sanctions for violations of tax and invoice regulations**, with the following details:

- Inspection period: **Fiscal years 2023 and 2024.**
- Violations: **Value-added tax (VAT) and corporate income tax (CIT).**
- Forms of sanction and remedial measures:
Imposition of administrative fines and compulsory payment of additional tax, penalties and late payment interest, with a **total amount of VND 151,660,184**
(In words: One hundred fifty-one million, six hundred sixty thousand, one hundred eighty-four Vietnamese dong).
- Payment details:
The above amounts shall be paid to the **State Treasury – Region I**, under the management of the **Ha Noi City Tax Department.**

3. Disclosure method

This information has been disclosed on the Company's website at: <https://airimex.vn>

We hereby certify that the information disclosed above is true and accurate, and we shall take full legal responsibility for the disclosed information in accordance with applicable laws.

Recipients:

- As above;
- Archived: Administration, Investor Relations.

**PERSON RESPONSIBLE FOR
INFORMATION DISCLOSURE
GENERAL DIRECTOR**

(Signed)

Đinh Ngọc Tùng



KẾ TOÁN TRƯỞNG
Nguyễn Thị Đào

DECISION

On administrative penalties regarding tax and invoice violations

HEAD OF THE HANOI DEPARTMENT OF TAXATION

Pursuant to Article 57 and Article 68 of the Law on Handling of Administrative Violations;

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

Pursuant to Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government providing for administrative penalties for tax and invoice 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 detailing a number of articles and measures for implementation of the Law on Handling of Administrative Violations;

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

Pursuant to Decision No. 1383/QD-CT dated June 30, 2025 of the General Department of Taxation regulating the functions, duties, powers of offices and divisions under provincial and municipal Tax Departments;

Pursuant to Decision No. 08/QD-HAN dated January 7, 2025 of the Head of the Hanoi Department of Taxation on delegation of authority to impose administrative penalties for tax and invoice violations;

Pursuant to the Tax Inspection Minutes dated December 6, 2025 of Inspection Team established under Decision No. 31348/QD-HAN-KTr2 dated November 17, 2025 on tax inspection at the head office of

<i>Aviation</i>	<i>Import</i>	<i>Export</i>	<i>Joint</i>	<i>Stock</i>	<i>Company;</i>
<i>Tax</i>			<i>Code:</i>		<i>0100107934;</i>

Address: No. 414 Nguyen Van Cu Street, Bo De Ward, Hanoi;

At the request of the Head of Inspection Division No. 2 – Hanoi Department of Taxation.

HEREBY DECIDES:

Article 1.

To impose administrative penalties for tax violations on the following organization:

1. Aviation Import Export Joint Stock Company

Tax Code: 0100107934

Address: No. 414 Nguyen Van Cu Street, Bo De Ward, Hanoi.

Tax inspection period: Years 2023 and 2024.

Business registration certificate No. 0100107934 issued on May 18, 2016.

Legal representative: Mr. Dinh Ngoc Tung, Male.

Position: General Director.

2. **Administrative violations committed:**

• **Value Added Tax (VAT):**

The Company declared input VAT credit for invoices of purchases from enterprises that had ceased operation at the registered business address (purchases made prior to the enterprises' notification of cessation). Therefore, the Company failed to comply with the provisions of Article 15, Clause 1, Chapter III of Circular No. 219/2013/TT-BTC dated December 31, 2013 of the Ministry of Finance.

• **Corporate Income Tax (CIT):**

The Company accounted deductible expenses for CIT purposes for invoices from enterprises that had ceased operation at the registered business address (purchases made prior to the enterprises' notification of cessation); accounted deductible expenses including VAT amounts corresponding to increased invoice values. Therefore, the Company failed to comply with Article 4 of Circular No. 96/2015/TT-BTC dated June 22, 2015 of the Ministry of Finance.

3. **Legal basis of violation:**

Point d, Clause 2, Article 138 of the Law on Tax Administration;

Clause 1, Article 16 of Decree No. 125/2020/ND-CP dated October 19, 2020 of the Government.

4. **Aggravating circumstances:** None.

5. **Mitigating circumstances:** None.

6. **Forms of penalties and remedial measures applied:**

a) **Administrative monetary penalty:**

Amount: **VND 22,092,402**

(Sub-item 4254), pursuant to Point c, Clause 2, Article 138 of the Law on Tax Administration; Clause 1, Article 16 of Decree No. 125/2020/ND-CP, being 20% of the understated tax amount detected through inspection, resulting in additional tax payable (including: Year 2023: VND 16,364,268; Year 2024: VND 5,728,134).

b) **Additional penalty:** None.

c) **Remedial measures:**

- Payment of outstanding **VAT** into the State Budget:

VND 19,539,211

(Sub-item 1701)

(Year 2023: VND 18,553,211; Year 2024: VND 986,000).

- Payment of outstanding **CIT** into the State Budget:

VND 90,922,798

(Sub-item 1052)

(Year 2023: VND 63,268,127; Year 2024: VND 27,654,671).

- Payment of **late payment interest** into the State Budget:

VND 19,105,773, calculated in accordance with Article 59 of the Law on Tax Administration and Article 16 of Decree No. 125/2020/ND-CP, including:

- Late payment interest on VAT: VND 5,031,381 (Sub-item 4931);
- Late payment interest on CIT: VND 14,074,392 (Sub-item 4918).

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The above late payment interest is calculated up to December 20, 2025.

The Company is required to self-calculate and pay additional late payment interest from December 21, 2025 until full payment is made into the State Budget.

Total amount of additional tax, penalties and late payment interest:

VND 151,660,184

(In words: One hundred fifty-one million six hundred sixty thousand one hundred eighty-four Vietnamese dong).

c.2) All costs for organizing and implementing remedial measures shall be borne by the violating organization.

7. Other handling measures: None.

Article 2.

This Decision shall take effect from the date of signing.

Article 3.

This Decision is delivered to:

1. Mr. Dinh Ngoc Tung, representative of Aviation Import Export Joint Stock Company.

Within ten (10) days from the date of receipt of this Decision, the organization stated in Article 1 must strictly comply with this Decision. The amounts of additional tax, penalties and late payment interest specified in Article 1 must be paid into Account No. 7111 at the State Treasury of Region I, managed by the Hanoi Department of Taxation.

In case the Company fails to voluntarily comply, enforcement measures shall be applied in accordance with the law; for each day of late payment of penalties, the violating organization must additionally pay 0.05% per day on the outstanding penalty amount.

Aviation Import Export Joint Stock Company has the right to lodge a complaint or initiate an administrative lawsuit against this Decision in accordance with the law.

2. State Treasury of Region I for coordination in collection.
3. Head of Inspection Division No. 2, Division of Tax Administration and Taxpayer Support No. 5 – Hanoi Department of Taxation for implementation.

Recipients:

- As stated in Article 3;
- Archived: Records, Office, Inspection Division No. 2.

**FOR THE HEAD OF THE HANOI
DEPARTMENT OF TAXATION**

DEPUTY HEAD

(Signed and sealed)

Nguyen Hong Thai