

Royalties Tariff

(Promulgated in conjunction with Resolution No. 928/2010/UBTVQH12 dated 19 April 2010 of the Standing Committee of the National Assembly)

1. Tariff of natural resources, except for crude oil and natural gas, coal gas:

No.	Group and type of resource	Tax rate (%)
I	Metallic minerals	
1.	Iron	10
2.	Manganese	11
3.	Titanium	11
4.	Gold	15
5.	Rare earth	15
6.	Platinum	10
7.	Silver, tin	10
8.	Wolfram, antimony	10
9.	Lead, zinc	10
10.	Aluminium, bauxite	12
11.	Copper, nickel	10
12.	Cobalt, molybdenum, mercury, magnesium, vanadium	10
13.	Other metallic minerals	10
II	Non-metallic minerals	
1.	Soil exploited for levelling or constructing works	4
2.	Stone, gravel	6
3.	Stone for limestone used for production of cement	7
4.	Sand	10
5.	Sand used for production of glass	11
6.	Soil used to make brick	7
7.	Granite	10
8.	Refractory clay	10
9.	Dolomite, quartzite	12
10.	Kaolin	10
11.	Mica, technical quartz	10
12.	Pyrite, phosphate	7
13.	Apatite, serpentine	3
14.	Anthracite coal exploited from underground mines	5
15.	Anthracite coal exploited from open-cast mines	7
16.	Brown coal, fat coal	7
17.	Other coal	5
18.	Diamond, ruby, sapphire	22
19.	Emerald, alexandrite, black precious opal	20
20.	Adrit, rhodolite, pyrope, beryl, spinel, topaz	15
21.	Crystal amethyst (purple blue, greenish yellow or orange); cryolite; precious opal	15

	(white or flame red); fenpat, birusa and nephrite	
22.	Other non-metallic minerals	5
III	Products of natural forests	
1.	Grade I timber	35
2.	Grade II timber	30
3.	Grades III and IV timber	20
4.	Grades V, VI, VI I and VI II timber and other types of timber	15
5.	Branch timber, tree-top timber and tree roots	10
6.	Firewood	5
7.	All types of bamboo and reed	10
8.	Sandalwood and aloe	25
9.	Anis, cinnamon bark and cardamom	10
10.	Other products of natural forests	5
IV	Natural marine products	
1.	Pearl, abalone and holothurian	10
2.	Other natural marine products	2
V	Natural water	
1.	Natural mineral water, natural thermal water and natural water which is filtered [and] bottled or canned	8
2.	Natural water used in hydroelectricity production	2
3.	Natural water used in production and/or business, except for the types prescribed in clauses 1 and 2 of this Group:	
3.1	Served as main or secondary materials for creation of the material elements in product production, except for water used for clean water production.	
a	Surface water	3
b	Underground water	5
3.2	Generally served for production (industrial hygiene, cooling, steaming, clean water production)	
a	Surface water	1
b	Underground water	3
3.3	Served for services activities, industrial production, construction, mineral exploitation.	
a	Surface water	3
b	Underground water	6
3.4	Served for other purposes	
a	Surface water	1
b	Underground water	3
VI	Natural swallow's nests	20
VII	Other natural resources	10

2. Tariff of crude oil and natural gas, coal gas:

No.	Exploitation yield	Tax rate (%)	
		Investment incentive projects	Other projects
I	Crude oil		
1.	Up to 20,000 barrels/day	7	10
2.	Over 20,000 barrels/day up to 50,000 barrels/day	9	12
3.	Over 50,000 barrels/day up to 75,000 barrels/day	11	14
4.	Over 75,000 barrels/day up to 100,000 barrels/day	13	19
5.	Over 100,000 barrels/day up to 150,000 barrels/day	18	24
6.	Over 150,000 barrels/day	23	29
II	Natural gas, coal gas		

1.	Up to 5 million m ³ /day	1	2
2.	Over 5 million m ³ /day up to 10 million m ³ /day	3	5
3.	Over 10 million m ³ /day	6	10

Mayer Brown JSM operates in association with Mayer Brown LLP, Mayer Brown International LLP and Tauil & Chequer Advogados, a Brazilian Law partnership with which Mayer Brown is associated. Mayer Brown is a leading global legal services provider with offices in major cities across Asia, the Americas and Europe. We have approximately 300 lawyers in Asia, 1000 in the Americas and 450 in Europe. Our presence in the world's leading markets enables us to offer clients access to local market knowledge on a global basis.

We are noted for our commitment to client service and our ability to assist clients with their most complex and demanding legal and business challenges worldwide. We serve many of the world's largest companies, including a significant proportion of the Fortune 100, FTSE 100, DAX and Hang Seng Index companies. We provide legal services in areas such as litigation; corporate and securities; finance; real estate; tax; intellectual property; government and global trade; restructuring, bankruptcy and insolvency; employment and benefits and environment. www.mayerbrownjism.com

Office Locations: Asia: Bangkok, Beijing, Guangzhou, Hanoi, Ho Chi Minh City, Hong Kong, Shanghai
Americas: Charlotte, Chicago, Houston, Los Angeles, New York, Palo Alto, Rio de Janeiro, São Paulo, Washington
Europe: Berlin, Brussels, Cologne, Frankfurt, London, Paris

Alliance Law Firms: Spain (Ramón & Cajal); Italy and Eastern Europe (Tonucci & Partners)

Please visit our website for comprehensive contact information for all offices.

www.mayerbrownjism.com

This Mayer Brown JSM publication provides information and comments on legal issues and developments of interest to our clients and friends. The foregoing is not a comprehensive treatment of the subject matter covered and is not intended to provide legal advice. Readers should seek specific legal advice before taking any action with respect to the matters discussed herein.

© Copyright 2010. Mayer Brown LLP, Mayer Brown International LLP, Mayer Brown JSM and/or Tauil & Chequer Advogados, a Brazilian law partnership with which Mayer Brown is associated. All rights reserved.

Mayer Brown is a global legal services organisation comprising legal practices that are separate entities (the "Mayer Brown Practices"). The Mayer Brown Practices are: Mayer Brown LLP, a limited liability partnership established in the United States; Mayer Brown International LLP, a limited liability partnership incorporated in England and Wales; Mayer Brown JSM, a Hong Kong partnership, and its associated entities in Asia; and Tauil & Chequer Advogados, a Brazilian law partnership with which Mayer Brown is associated. "Mayer Brown" and the Mayer Brown logo are the trademarks of the Mayer Brown Practices in their respective jurisdictions.