



Forvis Mazars in Vietnam Alert

Thought catalysts

AI Adoption in Vietnam: Strategic technology priorities (Decision 1131/QD TTg) and the AI Law (Law 134/2025/QH15)

Adoption patterns and broad risk themes

AI Adoption in Vietnam: Strategic technology priorities and the AI Law

Executive summary

Vietnam has elevated AI within a broader industrial and digital capability agenda by issuing a list of **11 strategic technology groups** and **35 strategic technology products** under **Decision 1131/QĐ-TTg**. The strategic list explicitly includes AI-related product categories such as Vietnamese large language models (LLMs), virtual assistants, domain-specific AI, analytical AI, digital twins, and metaverse/VR-AR elements, alongside enabling technologies such as cloud/data centers, robotics, semiconductors, and 5G/6G networks.

In parallel, Vietnam enacted its first standalone **Law on Artificial Intelligence (Law No. 134/2025/QH15)** on 10 December 2025, effective 1 March 2026, establishing a unified framework for AI activities and introducing a **risk based classification** concept (high/medium/low) as described in official text and practitioner overviews. This report provides (1) a high level view of the strategic technology context, (2) a high level overview of the AI Law's structure and implications, and (3) an overview of AI adoption across sectors in Vietnam, together with the broad risk themes relevant to organizations developing, deploying, or using AI.

Scope and method

This paper is not a compliance guide; it summarizes the legal perimeter at a high level and frames risks broadly for management and boards. The discussion of AI adoption draws on publicly available market studies, sector research, company examples, and digital transformation indicators. Where direct or comparable evidence is limited, the paper uses relevant proxies and labels any inferences as directional.

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1. Strategic technology context: Decision 1131/QĐ-TTg

Vietnam is prioritising the digital economy to drive its economic growth, positioning itself as a leading player in SEA. According to MIC, Vietnam's digital economy is growing 20% annually, and is estimated to contribute 18.3% to GDP in 2024. By 2030, the digital economy is projected to contribute 30% - 35% of GDP, with Vietnam aiming to enter the top 30 globally in digital economy contribution, up from 41st today.

Signed on 22 December 2024, Resolution No.57-NQ/TW is considered a breakthrough policy. Compared to Resolution No.10, which focused on agriculture and poverty reduction 40 years ago, this resolution now extends to science, technology, innovation, and digital transformation.

By 2030 - A high-growth digital economy

- The digital economy contributing 30% of GDP, with 50% of total exports coming from high-tech products
- Top 3 in ASEAN and top 50 globally in digital competitiveness & E-Government
- AI leadership: Vietnam to be a top 3 AI R&D hub in ASEAN
- Attract 3+ global tech giants for R&D and manufacturing
- 80% cashless transactions, driving fintech and digital payment growth, 80% of the population using digital public services
- 5+ leading Vietnamese tech firms at a global level
- 2% of GDP allocated to R&D, with 60% from private investment
- Strong infrastructure, strategic ownership of key tech, smart cities
- State-wide digital governance in place

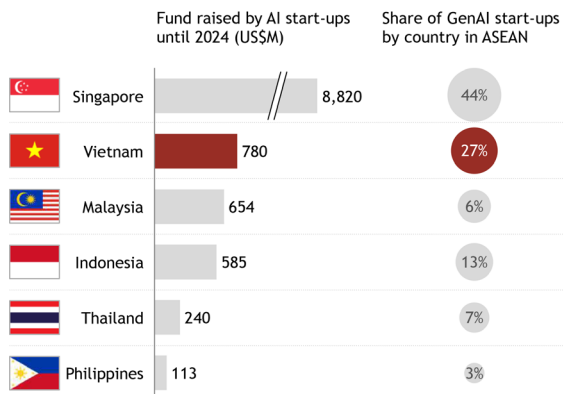
By 2045 - A leading innovation hub

- 50% of GDP from the digital economy, making it a top global tech hub
- Top 30 globally in innovation & digital transformation
- Attract additional 5+ global tech giants for R&D and manufacturing
- 10+ leading Vietnamese tech firms at a global level

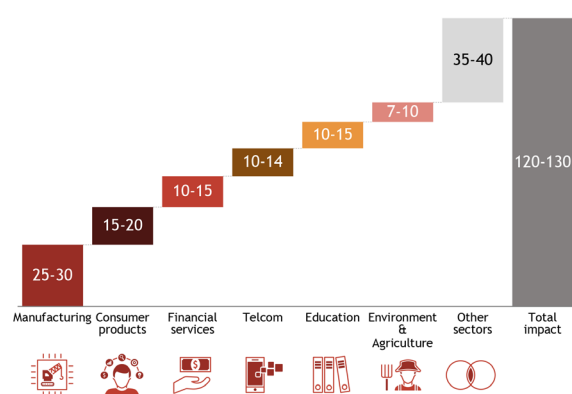
In this context, AI emerges naturally as the focal point for Vietnam. National Strategy on Research and Development and Application of AI (2021-2030) to position Vietnam as a global hub for innovation, AI solutions development, and applications by 2030. Local conglomerates such as Vingroup, Viettel, FPT, or VNG proactively establish partnerships with global leading tech companies such as NVIDIA, Google and Microsoft to build up infrastructure and AI talents in Vietnam. As labour costs trend higher, automation and IT investments are becoming more important for Vietnamese companies. Vietnam is emerging as a leading hub for investment and AI startups in the region, with its economy projected to gain up to USD 120 billion in economic benefits from AI according to a report by the National Innovation Center on 12 June 2025.

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Vietnam's AI startups are gaining momentum, surpassing regional peers to rank 2nd in SEA



AI is projected to contribute over \$120B to Vietnam's economy by 2040 (US\$B)



1. AI's impact on Vietnam's economy is estimated based on contribution to revenue growth and cost savings by improving labor productivity. In particular, this estimate is based on a forecast on the size of GDP of sectors in Vietnam in 2040, AI revenue impact rate according to BCG analysis, along with industry-specific cost savings rates published by the OECD. The figure is calculated using real 2015 USD exchange rate
Source: Pitchbook, GenAI Startup 2024 report, BCG analysis

Decision 1131/QD-TTg publishes the list of strategic technologies and strategic technology products, with an official count of 11 groups and 35 products reported by government channels and reflected in official listings. The AI-related group includes Vietnamese LLMs, virtual assistants, domain-specific AI, analytical AI, digital twins, and metaverse categories, indicating an intent to prioritise both foundational AI capability and applied AI products. The same strategic list includes enabling layers such as cloud computing and large-scale data centers, robotics/automation, semiconductor chips (including AI chips), and next-generation mobile networks, which together suggest an integrated approach to industrial digital capability rather than "AI in isolation".

2. High-level legal perimeter: Law on Artificial Intelligence (Law 134/2025/QH15)

2.1. Scope and applicability

The AI Law regulates research, development, provision, deployment, and use of AI systems in Vietnam, and applies to both domestic and foreign organisations/individuals engaged in AI activities in Vietnam, with exclusions for AI activities exclusively serving national defense/security/cipher purposes. The law defines key lifecycle roles (developer, provider, deployer, user), which is relevant for allocating responsibilities across AI development and deployment chains.

2.2. Risk-based framing (high level)

Practitioner summaries describe the AI Law as adopting a risk-based approach, typically classifying AI systems into high-risk, medium-risk, and low-risk categories based on their potential impact on human rights, safety and security, sector of application, scope and scale of users and impact,

with increasing obligations for higher-risk systems (e.g., documentation, transparency, safety/oversight expectations).

Following the AI Law, on 30 June 2026, the Prime Minister issued Decision 33/2026/QD-TTg, effective 15 August 2026, establishing the list of high-risk AI systems. The list covers AI systems in six sectors: education, healthcare, banking, transport, ethnic affairs and religion, and judicial proceedings, and sets sector-specific criteria for determining risk levels.

This risk-based framing is consistent with Vietnam's stated objectives of enabling AI development while setting baseline safeguards.

The responsibility for classifying AI systems primarily rests with the provider and deployer (in cases where modifications, integration or changes in functionality create new or higher risks).

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2.3. Adjacent rules that shape AI deployment (brief boundary conditions)

AI deployments involving personal data are materially affected by Vietnam's personal data protection framework under **Law on Personal Data Protection No. 91/2025/QH15** (effective 01 January 2026), which applies broadly to personal data processing activities. Cybersecurity regulations may also shape architecture decisions for certain service providers under Cybersecurity Law 2025.

AI systems used in consumer-facing activities should take into account the requirements under the Law on Protection of Consumer Rights 2023, including periodic assessment of the use of AI and automated systems, particularly for large digital platforms.

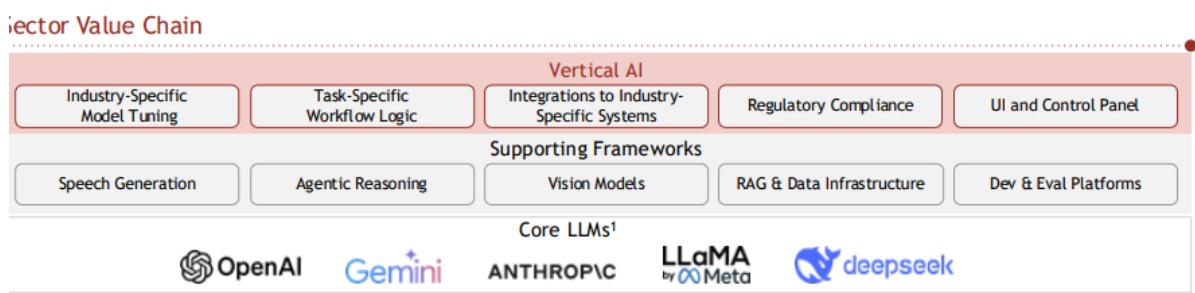
The AI Law also provides that the application of AI in specific sectors must not only comply with the risk-management principles under this Law but also comply with other relevant sector-specific laws and regulations.

AI Adoption in Vietnam:

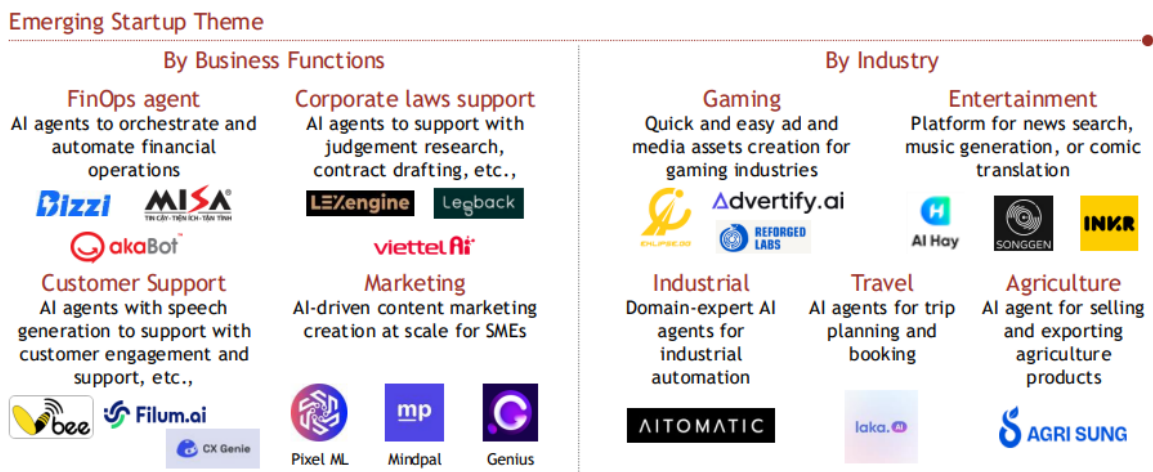
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3. Adoption patterns in sectors (examples; high level)

According to BCG, AI is expected to significantly boost Vietnam’s economy - especially in the manufacturing sector, which alone could see an impact of USD25b - 30b, followed by consumer products, financial services, telecom, and education. Many of these sectors have lagged in digitalisation due to the challenge of processing large volumes of unstructured data and relying on outdated legacy IT systems that depend on numerous physical interactions. The new generation of AI, driven by large language models (LLMs), is tailor-made for these vertical markets. It can efficiently manage domain-specific, unstructured, and regulated data while automating tasks traditionally performed by human experts, ultimately capturing a larger share of the customer value chain.



Looking ahead, success in Vertical AI will be shaped by dynamics distinct from those driving foundational model companies. While foundational AI players focus on advancing technology and pushing technical boundaries, Vertical AI will be defined by its ability to tailor these cutting-edge tools to the unique demands of each industry. The key challenge - and opportunity - lies in transforming powerful yet generic AI into specialised, deployment-ready solutions that deliver tangible value.



Vietnam currently ranks 45th out of 195 countries in the Government AI Readiness Index report by Oxford Insights (UK), surpassing the global average and maintaining its position regionally at 5th in Southeast Asia.

In the private sector, AI has gradually expanded across industries in Vietnam since 2019, including banking, insurance, consumer finance, retail, healthcare, consumer packaged goods (CPG) and manufacturing. However, the AI use cases currently being implemented remain relatively nascent compared to those in other countries. For example, in the banking industry, one of the leading sectors in AI adoption, AI is primarily used for facial recognition, electronic know-your-customer (eKYC), optical character recognition (OCR), and call or voice bots deployed in contact centers, collections and credit card activation. In other industries, some advanced applications are emerging, such as image diagnostics in healthcare and AI/ML-driven analytics in some global CPG/FMCG companies.

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Late 2023 and early 2024 marked a turning point for AI in Vietnam, driven by the rapid rise of the ChatGPT phenomenon. As a result, Vietnamese companies began increasing their focus on AI, with a growing interest in GenAI. However, as GenAI is still a relatively new technology, its adoption remains in the early stages. Some large companies have started piloting GenAI, mainly for internal purposes such as document and knowledge navigation, HR tasks like automated CV scanning and profiling, staff training, and IT support through code copilots. External-facing use cases are still largely focused on GenAI-powered chatbots and voice bots.

GenAI/AI is still in its early stages in Vietnam, but this presents significant opportunities for companies to fully harness its potential. While many Vietnamese companies are initially focusing on the productivity and efficiency benefits of GenAI/AI - the most tangible and easiest to implement - the real power of GenAI/AI is to fundamentally reshape how entire functions operate, driving deeper productivity gains and reducing costs, and even inventing new business models to create new sources of competitive advantage to improve top-line growth.



Deploy GenAI/AI in everyday tasks to realize 10% to 20% productivity potential. Select and test GenAI/AI tools, deliver massive upskilling, roll out solutions to support workers in day-to-day tasks and carefully evaluate the costs of deployment.



Reshape critical functions for 30% to 50% enhancement in efficiency and effectiveness. Anticipate the impact of GenAI/AI on your workforce and core functions, create new roles, reallocate budgets and guide a series of pilots that can reliably scale up.



Invent new GenAI/AI business models to build a long-term competitive advantage. Develop a strong customer-centric approach, and leverage first-party data and intellectual property to create interactions that customers can't find anywhere else.

AI adoption in Vietnam surged in 2024, with 47,000 new enterprises implementing AI, bringing total adoption to nearly 170,000 firms, accounting for around 18% of all enterprises nationwide, and increasing by 13% compared to the previous year, representing a year-on-year growth rate of approximately 39% in AI adoption according to a study by Amazon Web Services in 2025. AI solution provision is concentrated primarily in the IT sector, which accounts for 31%, followed by finance and banking (22%), education (17%), and healthcare and e-commerce (15%).

Despite strong growth momentum, Vietnam's AI market continues to face several structural challenges that may constrain its long-term scalability and competitiveness. According to the Vietnam Artificial Intelligence Annual Report 2025 by the Institute of Information Technology, Vietnam National University, based on a survey of nearly 500 enterprises and organisations conducted from July 2025, the most significant challenge facing AI solution providers is the shortage of high-quality talent (45%), while 23% struggle with data and computing infrastructure constraints.

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Vietnam's AI market is segmented between well-resourced technology conglomerates - such as FPT, Viettel, VNPT, and Vingroup - which lead in infrastructure and R&D but often keep applications within their own ecosystems, and emerging companies focused on specialised solutions. Several Vietnamese players have gained global recognition: Abivin won the 2019 Startup World Cup for AI-powered logistics optimisation, VinAI publishes in leading international journals, and NVIDIA's acquisition of VinBrain validated Vietnam's healthcare AI capabilities. Other domain specialists, including ELSA Speak in English learning and Trusting Social in alternative credit scoring, further demonstrate how focused expertise can create defensible advantages, although access for SMEs and the public sector remains limited.

No.	AI developers	Main products	AI Application Profile
1	CMC Corporation	C-OCR, CATI-VLM model, government AI services	CATI-VLM model achieved top 12 global ranking in 2025 Robust Reading Competition. C-OCR processes thousands of official documents daily for government services.
2	FPT Software	AI Center, FPT.AI platform, chatbots, NLP, computer vision	Vietnam's largest IT services company with \$7.7 billion market cap and \$2.47 billion revenue in 2024. Developing \$200M "AI Factory" using NVIDIA H100/H200 chips, targeting 6,000 AI engineers by 2028.
3	VNG Corporation (Zalo AI)	Zalo messaging, KilM LLM, GreenNode AI Cloud	Vietnam's first tech unicorn valued at \$3 billion with 2,000+ employees including 300+ AI specialists. Zalo processes nearly 2 billion messages daily, with 20% of users utilising AI features.
4	Cinnamon AI	Intelligent Document Processing (IDP), knowledge mining, OCR	Global enterprise AI startup with strong Vietnamese presence. Specialises in document intelligence for business process automation across finance and logistics sectors.
5	Viettel AI	Cyberbot Platform, AI Robot Platform, Digital Twin, facial recognition	Military-backed telecommunications conglomerate's AI division. Developing five core product lines covering chatbots, robotics, analytics, and digital twin technologies. Targets Asia-Pacific leadership by 2030.
6	VNPT AI	VNPT BioID, computer vision, ASR, video analytics	State-owned telecommunications provider's AI arm. BioID platform serves banking and securities sectors with high-speed biometric processing. Integrating NVIDIA DeepStream SDK for real-time video analytics.
7	VinBrain	AI-powered medical diagnostics, X-ray analysis, pathology imaging	Healthcare AI startup with solutions deployed in 182+ hospitals. NVIDIA announced acquisition in December 2024 to accelerate healthcare AI innovation.

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No.	AI deployers	Main products	AI Application Profile
1	Vietcombank	Commercial banking	Largest Vietnamese bank by assets. Deploys AI for customer service automation, fraud prevention, credit risk assessment, and personalised banking experiences.
2	Vingroup	Conglomerate (real estate, retail, automotive)	Launched VinVentures fund with \$150M AUM focused on AI and semiconductor startups. Integrates AI across VinFast automotive, VinMart retail, and VinHomes real-estate.
3	MoMo	Digital payments, e-wallet	Vietnam's fintech unicorn using AI for fraud detection, credit scoring, and personalised financial services. 30+ million users leveraging AI-driven payment recommendations.
4	Tiki Corporation	E-commerce platform	Uses AI recommendation engines analysing 50M+ searches monthly, computer vision for product categorisation, and robotics processing 50,000 orders daily, 800 distribution hubs nationwide.
5	Trusting Social	Alternative credit scoring	FinTech startup using AI and machine learning to analyse non-traditional data for credit decisions, helping underbanked populations access financial services.
6	Shopee Vietnam	E-commerce marketplace	Employs machine learning for personalised shopping, resulting in 20% increase in customer retention. AI-powered inventory and demand forecasting systems.
7	ELSA Speak	English pronunciation AI coaching	Serves 50 million users worldwide with AI speech recognition technology achieving 95% accuracy. Raised \$60M total funding, representing Vietnam's EdTech success.
8	Be Group	Ride-hailing, delivery platform	Applies AI across its ride-hailing platform to improve real-time route optimisation, demand forecasting, and driver-passenger matching, enabling trip allocation and pricing decisions within seconds.

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Broad risk themes

For boards and management teams, the principal risks associated with GenAI and AI adoption in Vietnam extend beyond model performance.

They arise from strategic readiness, implementation capability, technology infrastructure, and the evolving legal and governance environment. These risks should be assessed across the AI lifecycle and calibrated to the nature, scale, and potential impact of each use case.



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Broad risk themes

1. Strategic and organizational risks

- Leadership capability and strategic direction. Limited AI proficiency at executive level can constrain informed decision-making, reduce awareness of enterprise-wide opportunities and risks, and leave initiatives without clear sponsorship. Where AI projects are embedded in broader transformation programs or launched to solve isolated problems, investment can become fragmented and difficult to scale.
- Governance and change management. Weak accountability, unclear decision rights, and resistance to new processes can prevent pilots from becoming sustainable operating capabilities. Effective adoption requires defined ownership, cross-functional governance, workforce engagement, and changes to controls, roles, and ways of working.

2. Implementation and technology risks

- Data quality, availability, and lawful use. AI performance depends on sufficiently structured, reliable, representative, and legally usable data. Weak data foundations can limit model development and fine-tuning, while personal data requirements may restrict how employee, customer, and third-party information is collected, stored, transferred, and processed.
- Talent and operating capability. Shortages of experienced AI professionals at both leadership and operational levels can hinder solution design, vendor oversight, integration, validation, and ongoing monitoring.
- Infrastructure and scalability. Access to computing capacity - particularly GPUs - and the cost of building secure inference environments can be significant. These constraints are more pronounced where organisations require private or on-premises deployment and may prevent promising pilots from scaling economically.
- Operational reliability. Model errors, system failures, or poorly integrated solutions can disrupt manufacturing, logistics, customer service, and other core processes. Organisations should therefore prioritise end-to-end design, testing,

fallback procedures, human oversight, and continuous performance monitoring rather than relying on fragmented pilots.

3. Security, legal, and regulatory risks

- Security, confidentiality, and third-party exposure. The use of external models and service providers can create risks of data leakage, unauthorised access, and reuse of proprietary or personal information for model training. Contractual safeguards, access controls, deployment architecture, and vendor monitoring should be proportionate to the sensitivity of the data and the criticality of the use case.
- Transparency and human oversight. Organisations may be unable to explain how an AI system reached a decision or to identify when human review is required. This risk becomes more significant where outputs affect individuals, regulated activities, or business-critical decisions.
- Regulatory classification and compliance. Vietnam's risk-based AI framework requires providers and deployers to understand their roles, determine the applicable risk classification, and implement corresponding documentation, transparency, safety, and oversight measures. Sector-specific rules, personal data protection requirements, consumer protection obligations, and cybersecurity controls may apply in parallel.
- Cybersecurity and data architecture. Requirements affecting information-system security, data storage, and cross-border transfers may shape the choice between public cloud, private cloud, and on-premises deployment. Architecture decisions should therefore be addressed early rather than treated as a technical issue after the use case has been designed.

Taken together, these risks argue for a portfolio-based approach: prioritise use cases by value and risk, establish accountable governance, strengthen data and infrastructure foundations, and scale only where controls and operating readiness are proportionate to the intended deployment.

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