Doing business in Thailand

2021

mazars

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A word from our Managing Partner

Mazars in Thailand is a leading audit, accounting, legal, tax and financial advisory practice, combining the benefits of an integrated global partnership with the entrepreneurial drive of the partners. Mazars in Thailand has over 300 professionals. One of the main advantages we offer our clients is the multinational composition of staff. Our practice has Australian, British, Dutch, German, Indian, Japanese, Korean, and Thai nationals among its senior advisors, which ensures that we are well placed to act as a bridge between businesses operating in Thailand and related companies overseas.

Rob Hurenkamp
Managing Partner, Thailand

"Mazars, a leading audit and advisory firm, providing services with a personal touch in response to the local and global needs of our clients and people. Our talented professionals will work in partnership guidelines with our clients to capture future opportunities in a growing market with the aim to both do the right thing and create long-term economic prosperity."

1
Global integrated partnership

12
Partners

€11M
Fee income

300
Staff

9
Nationalities

8
Languages

Who we are
Mazars at a glance

We, at Mazars, are dedicated to delivering tailormade solutions and services to our clients wherever they are in the world. International, integrated and independent, we are a partnership specialising in audit and advisory services.

We care about the success of our clients and people, we preserve the integrity of our industry, and we are committed to passing on a just and prosperous world to future generations.

Our values guide us in everything we do: how we work with our clients, how we develop our people and what role we play in our communities. Not only have our values contributed to our firm's decades long story of growth, they also demonstrate our commitment to going above and beyond what is expected of us - today and tomorrow.

Integrity

Responsibility

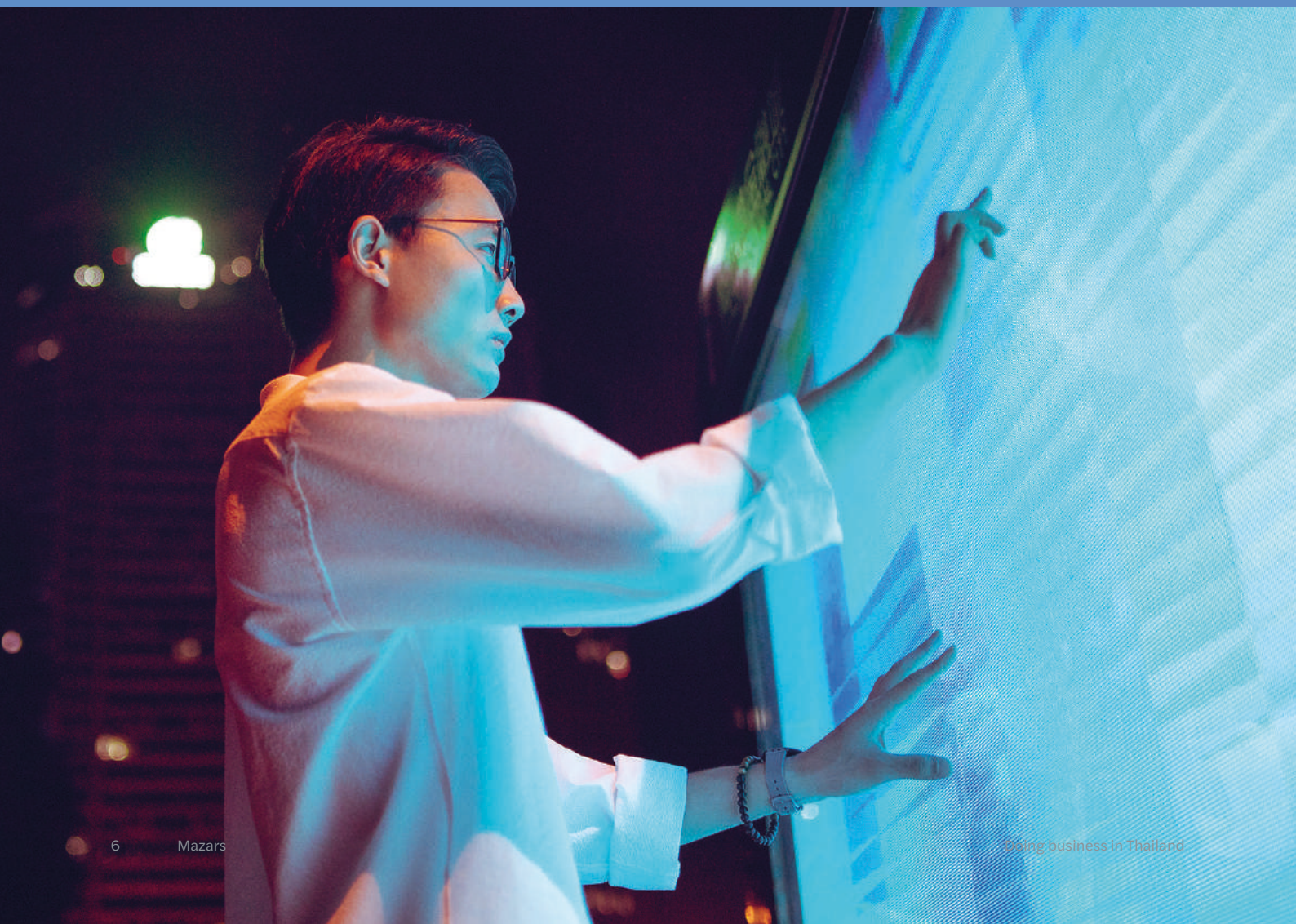
Diversity and respect

Technical excellence

Independence

Stewardship

Focus on
General information



Focus on

General information

Opportunities and possible obstacles for foreign investors

The Thai Government has long maintained an open market-oriented economy, and encouraged foreign direct investment. Following the 1997-98 Asian financial crisis, the Government embarked on an International Monetary Fund-sponsored economic reform programme, designed in part to promote a more competitive and transparent climate for foreign investors. Although protracted, the reform process continues to move ahead, and Thailand remains committed to economic reform and an open investment regime.

The Foreign Business Act of 1999 governs most investment activities by foreign nationals. It opened additional business sectors to foreign investment, and increased maximum ownership stakes permitted in some sectors above the standard 49% limitation. It continues to restrict foreign-majority participation in certain types of businesses, but this restriction excludes the majority of manufacturing ventures.

Area and population

Thailand is one of the largest countries in Southeast Asia. It shares borders with Myanmar to the west, Lao PDR to the north and northeast, Cambodia to the east, and Malaysia to the south. The population of Thailand is estimated at 67 million. With a population of over 10 million, the capital city of Bangkok is the most important city, economically and politically.

Government and law

Thailand is a constitutional monarchy, with the Prime Minister as the head of government, and a hereditary monarch as the head of state. The judiciary is independent of the executive and the legislative branches.

Thailand is divided into 77 provinces (changwat), which are gathered into five groups of provinces by location. There are also two specially governed districts - the capital Bangkok (Krung Thep Maha Nakhon) and Pattaya. For administrative purposes, each province is divided into districts and the districts are further divided into sub-districts (tambons).

Thailand's legal system combines principles of traditional Thai and Western laws. Its members are nominated by the Senate and appointed by the King. The Courts of Justice have jurisdiction over criminal and civil cases, and are organised in three tiers:

1. Court of First Instance
2. The Court of Appeals
3. The Supreme Court of Justice

Administrative courts have jurisdiction over suits between private parties and the Government, and cases in which one government entity is suing another.

Currency

The Thai Baht ("฿" or "THB") is the currency of Thailand. One baht is divided into 100 satang. Issuing currency is the responsibility of the Bank of Thailand.

Economy

The economy of Thailand is a newly industrialised country one which is heavily export-dependent, with exports accounting for more than two-thirds of GDP.

Thailand's main exports are machinery (including computers), electronic equipment, vehicles, rubber, and gems.

Electrical machinery, mineral fuels, and other machinery (including computers) are the top three import products of Thailand.

To encourage export activities, a number of tax incentives are available. The exportation of goods is zero rated for purposes of value-added tax (VAT), whilst custom duties already paid will be refunded on materials imported for the production of goods which are then exported.

The Ministry of Commerce designates classes of goods that are subject to import controls, which usually take the form of permits and licences. Applications for a licence must be accompanied by a supplier's order, confirmation, invoice, and other pertinent documents. Goods subject to import controls include medicine, minerals, explosives, fireworks, antiques, and cosmetics. Customs duty is also levied on some type of goods imported into Thailand.

Finance

Thailand has a substantial number of financial institutions, both private and government owned. The financial institutions in Thailand offer a full range of financial services under the supervision of the Bank of Thailand. In general, Thai banks are reluctant to lend money to start-up companies and small international entities. Normally, collateral is needed to secure external funding. The collateral can be in the form of a title deed of land, a bank guarantee from a parent company, or a guarantee via the Thai

Credit Guarantee Corporation. In addition, Thailand is a member of the World Bank and the Asian Development Bank.

Immigration law

Visas

All people, other than those in transit and Thai nationals, are required to obtain a visa in order to enter Thailand. Foreign nationals who intend to remain in Thailand to work or conduct business must comply with visa requirements, in addition to obtaining a work permit. Visa categories include:

1. **Tourist** - Foreigners who obtain a visa from a Thai embassy or consulate will be granted a stay of 60 days. Renewals, at the discretion of the Immigration Department, are normally granted for up to 30 days at a time.
2. **Visitor in transit / on arrival** - Nationals of many countries are able to enter Thailand without a visa and remain for 30 days per visit. Foreigners who have a visa exemption for a 30-day stay will receive one extension of stay for no longer than 30 days from the end of the original 30-day stay.
3. **Immigrant** - A person wishing to immigrate to Thailand may apply for a certificate of permanent residence. However, the conditions for qualifying as an immigrant are quite restrictive, being covered by annual immigration quotas and other conditions fixed for each country by the Ministry of the Interior.
4. **Non-quota immigrant** - This category includes former residents who have lost their residence status, but who have reapplied to resume their residency, and who are able to provide a convincing reason for granting this type of visa.
5. **Non-Immigrant** - Foreigners seeking a prolonged stay or looking to work in Thailand, should obtain non-immigrant visas for themselves and all family members before entering Thailand. The visa is generally granted for an initial stay of 90 days, but it may be extended to up to one year, and is renewable each year. A foreigner holding this type of visa is entitled to apply for a work permit. Holders of a transit, tourist or non immigrant O (non Thai-Spouse) visa cannot apply for a work permit.
6. **Ninety-day report** – Foreigners granted permission to stay in Thailand must report to the Immigration Department every 90 days, or 90 days from the date of most recent entry into Thailand.

Giving notification of the residence (TM30) - The owner or landlord of the place where an expatriate lives must notify the immigration office of this by submitting Form TM30. In theory, notice should be given within 24 hours of the expatriate entering the country. In practice, the landlord or house owner should give this notice every time the expat return back to Thailand. If the immigration found that an expatriate who does not give such notice is subject to a maximum fine of THB 2,000, and cannot extend visa and 90 days report.

Work permits

The Foreign Employment Act (Foreigners' working Management Emergency Decree No 2 BE 2561) lists numerous rules regarding work permits, which are summarised here:

1. With a few exceptions, the law requires all foreign nationals who work in Thailand to have work permits issued by the Department of Employment, and Ministry of Labour. Employers in Thailand may apply for a work permit for prospective foreign employees who wish to work in Thailand before the employee starts working.
2. The use of these work permits is restricted to the particular occupation, particular employer, and particular locality for which they are requested. Any change in these restrictions will require a new work permit.
3. Foreigners temporarily working in Thailand under the Foreigners' working law to perform an essential and urgent assignment for a period not exceeding 15 days do not have to apply for a work permit. However, such a foreigner may engage in such work upon notifying the registrar in writing. If the foreigner does not complete the work within such prescribed time period, the employer may request for extending before the time has lapsed but can extending for a period not exceeding 15 days. Activities not requiring a work permit – a foreign national entering into Thailand irregularly for attendance a meeting, training, seminar, performance of arts, culture, sports competition or other activities as prescribed by the Council of Ministers , will be given an exemption from having to obtain a work permit.
4. The employer who employs the foreigner has to inform the Labour officer the name, nationally of such foreigner and job description of within 15 days as from the day of employment and when the foreigner has resigned.

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General information

5. A foreigner seeking permission to work in Thailand under a special law must submit an application for positions for foreign skilled workers and experts, then apply for individual placement in the approved position by the governmental authority (such as the Board of Investment [BOI], the Industrial Estate Authority of Thailand [IEAT], or the Department of Mineral Fuels [DMF]). Such a foreigner may engage in authorised work while the application is being processed.

Smart visa

The smart visa project is intended to encourage foreigners to enter Thailand to exchange knowledge with the Thai public and private sectors to enhance business growth.

The holder of a smart visa will be able to stay in Thailand a maximum of 4 years. Dependants (such as a spouse and children) will also be entitled to the same right to live and work in Thailand as the smart visa holder. A person who receives a smart visa will not be required to apply for a work permit, and the period of time for giving notice of continued residence in Thailand will be extended from every 90 days to once a year.

Focus on

Regulation of foreign investment

Focus on

Regulation of foreign investment

The Thai Government offers a range of incentives to investors, administered by the Board of Investment (BOI) and the Industrial Estate Authority of Thailand (IEAT), and these incentives often come with permission for full foreign ownership. The BOI issued a new policy effective 1 January 2015. Under the new scheme, special consideration is given to enhancing Thailand's competitiveness. The IEAT carries out the government's industrial development policy, which includes allocating land for further expansion, improving land conditions, and providing accommodations and facilities to assist entrepreneurs.

Foreign Business Act

The Foreign Business Act regulates the activities in which companies designated as "foreign" may engage in. While some activities are completely prohibited, some may be engaged in with prior approval from a designated government agency, and some do not require any special approval.

Definition of "foreign company"

Under Thai law, a company registered under the following laws must be deemed a foreign company:

1. The laws of another country (including all branches, representative offices, and regional offices of companies abroad operating in Thailand);
2. Thai law, but where 50% or more of its shares are held by foreign individuals or business entities.

The Foreign Business Act has identified three lists of activities in which foreign participation may be prohibited or restricted.

1. **Activities stated in List 1** are designated as "businesses that foreigners are not permitted to conduct for special reasons". Foreign companies are completely restricted from engaging in the activities contained in List 1.
2. **Activities stated in List 2** are designated as "businesses related to national safety or security, activities affecting arts and culture, traditional and folk handicraft, or natural resources and the environment". Foreign companies may only engage n the activities stated in List 2 with prior Cabinet approval.
3. **Activities stated in List 3** are designated as "businesses in which Thai nationals are not yet ready to compete with foreigners". To engage in activities stated in List 3, the foreign company must apply for and obtain a foreign business licence prior to commencing the activity.

Companies promoted by the BOI are permitted to engage in certain business activities restricted under the Foreign Business Act by obtaining the foreign business certificate prior to conducting its business.

Exchange controls

Foreign currency

Foreign currencies can be transferred from or brought into Thailand without limit. With limited exceptions, any person receiving foreign currencies from abroad is required to convert such foreign currency into Thai baht or to deposit the same in a foreign currency account with an authorised financial institution within 360 days. A Foreign Exchange Transaction must be submitted to authorised commercial banks for each transaction involving the purchase, sale, deposit, or withdrawal of such foreign currency.

The Bank of Thailand issued rules on 6 November 2019 (with effective on 8 November 2019) to facilitate outward transfers. An individual who wishes to relocate abroad or to transfer funds to relatives abroad is free to transfer funds. If the purpose of the transfer is to buy real estate abroad, the equivalent of USD 50 million a year can remitted abroad.

As part of these new rules, the Bank of Thailand relaxed the documentation requirements for outward transfers of up to the equivalent of USD 200,000. However, there are many exceptions to the general rule, where permission from the Bank of Thailand is still required.

Focus on

Regulation of foreign investment

Local currency

There is no restriction on the amount of Thai baht that may be brought into the country. A person travelling to Thailand's bordering countries, as well as Vietnam, is allowed to take out up to THB 2,000,000, and up to THB 50,000 if travelling to other countries, without authorisation. Any amount exceeding THB 450,000 or equivalent to USD 15,000 must be declared to Thai customs before arriving or departing Thailand.

All foreign exchange transactions must be conducted through commercial banks and through authorised non-banking institutions that are granted foreign exchange licences by the Minister of Finance, namely authorised money changers, authorised money transfer agents, and authorised companies. Any transactions not conducted through the above-mentioned licensees require approval from the Bank of Thailand, which will be assessed on a case-by-case basis.

Focus on
Government incentives

Focus on

Government incentives

The Thai Government has issued several incentives to promote business. In the second half of 2018, the investment promotion measures include incentives from the Eastern Economic Corridor (EEC) and the International Business Center ("IBC").

Current BOI investment promotion scheme

Thailand's Board of Investment (BOI) changed the investment promotion scheme effective from 2015 to match the needs and level of development in Thailand. Under the current scheme, zones 1-2-3 were removed, and a number of eligible activities which do not involve high technology were deleted or entitled to fewer incentives. Under this scheme, the BOI pays more attention to the following issues:

1. Investments that help enhance Thailand's competitiveness by encouraging R&D, innovation, and value creation in the agricultural, industrial, and services sectors, SMEs, fair competition, and social/economic improvement;
2. Activities that are environmentally friendly, save energy, or use alternative energy to drive balanced and sustainable growth;
3. Projects within clusters to create investment within the region and to strengthen value chains;
4. Investments in border provinces in the south of Thailand to develop the local economy that supports the enhancement of security in the area;
5. Investments in special economic zones, especially in border areas, both inside and outside industrial estates, to create economic connectivity with neighbouring countries, and to prepare for the ASEAN Economic Community (AEC); and
6. Thai investments abroad to enhance the competitiveness of Thai businesses and Thailand's role in the global economy.

Under the current scheme, the BOI offers activity-based incentives and merit-based incentives to encourage the entities receiving investment incentives to create more value in Thailand.

Focus on
Government incentives

Activity-based incentives

From "seven-year investment promotion strategy (2015-2021)", the BOI continue offering 6 different packages of activity-based incentives, as follows:

Packages	Incentives
A1: For knowledge-based activities, focusing on R&D and design to enhance the country's competitiveness	• An eight-year corporate income tax ("CIT") exemption without a cap • An exemption from import duty for machinery/raw materials • Non-tax incentives
A2: Activities in infrastructure for the country's development, activities using advanced technology to create added value, where there are no or very few existing investments in Thailand	• An eight-year CIT exemption (with a cap) • An exemption from import duty for machinery/raw materials • Non-tax incentives
A3: High-technology activities which are important to the country's development, where there are a few investments already existing in Thailand	• A five-year CIT exemption (with a cap) • An exemption from import duty for machinery/raw materials • Non-tax incentives
A4: Activities with lower technology than Group A1 through Group A3 above, but which add value to domestic resources and strengthen the supply chain	• A three-year CIT exemption (with a cap) • An exemption from import duty for machinery/raw materials • Non-tax incentives
B1-B2: Supporting industries that do not use high technology but are still important to the value chain	• An exemption from import duty for machinery (for Group B1) • An exemption from import duty for raw materials (for Group B1 and Group B2) • Non-tax incentives (for Group B1 and Group B2)

Focus on
Government incentives

Merit-based incentives

1. **Enhancement of competitiveness**
   Additional CIT incentives will be granted, depending on the ratio of investment to expenditure.

Ratio of qualified investment/expenses to combined revenue of the first 3 years	Additional tax exemption period with an additional cap
1% or more than THB 200 million	1 year
2% or more than THB 400 million	2 years
3% or more than THB 600 million	3 years

Qualified investment/expenses and the amount of the additional cap are as follows:

Qualified investments/expenditures	Additional cap
1. R&D: in-house, outsourced in Thailand, or joint R&D with institutes abroad	300%
2. Donations to technology and human resources development funds, educational institutes, specialised training centres, R&D institutes, or governmental agencies in scientific and technological fields in Thailand, as approved by the BOI	100%
3. IP acquisition/licensing fees for commercialising technology developed in Thailand 4. Advanced technology training 5. Development of local suppliers with at least a 51% Thai shareholding in advanced technology training, and technical assistance 6. Product & packaging design: in-house or outsourced in Thailand, as approved by the BOI	200%

2. **Decentralisation**
   Projects located in the 20 provinces with the lowest per capita income (Kalasin, Chaiya-phum, Nakhon Phanom, Nan, Bueng Kan, Buri Ram, Phrae, Maha Sarakham, Mukdahan, Mae Hong Son, Yasothon, Roi Et, Si Sa Ket, Sakhon Nakhon, Sa Kaew, Sukhothai, Surin, Nong Bua Lamphu, Ubon Ratchatani, and Amnatcharoen) could receive the following benefits:

- Additional years of exemption from corporate income tax;
- Activities in Group A1 and A2 receive an additional 50% reduction in CIT for 5 years after the end of the CIT exemption period;
- Double deductions for the costs of transportation, electricity, and water for 10 years; and
- An additional 25% deduction of the cost of the installation or construction of facilities

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Government incentives

3. **Industrial area development**
   Projects located in industrial estates or promoted industrial zones could receive 1 additional year of exemptions from CIT.
4. **Other special policies**
   Some incentives can be granted based on the following policies:
   - Investment promotion policy for industrial development in border provinces in southern Thailand
   - Promotion of industrial estates or industrial zones and projects located inside industrial estates or industrial zones or clusters in border provinces in southern Thailand
   - Investment promotion policy for investment in special economic zones
   - Promotion of rail system industry

Investment incentives and measures in EEC

By virtue of the Investment Promotion Act, the Board of Investment ("BOI") issued BOI Announcement No. 2/2020 on 15 January 2020, revising the investment incentives to be offered to private investors who conduct business in the EEC area, which covers three provinces: Chachoengsao, Chonburi, and Rayong.

Activities eligible for additional tax incentives cover the following 5 categories:

1. Knowledge-based activities focusing on R&D and design to enhance the country's competitiveness ("A1");
2. Infrastructure activities for the country's development, and activities using advanced technology to create added value, with no or very few such investments in Thailand ("A2");
3. High-technology activities which are important to the development of the country, with a few such investments already existing in Thailand ("A3");
4. Activities supporting the development of targeted technology and innovation, such as biotechnology, nanotechnology, advanced material technology, and digital technology ("Section 8"); and
5. Activities supporting the development of targeted technology and meeting the conditions for cooperation set out by the BOI ("Activities combining with Section 8"), including:
   - Business category 5.6 - The manufacture of electrical products
   - Business category 7.11 - Research and development
   - Business category 7.13 - Engineering design
   - Business category 7.14 - Scientific laboratories
   - Business category 7.15 - Calibration services
   - Business category 7.19.1 - Vocational training centres

The additional tax incentives to be offered to investors under this announcement will be determined based on the human resource development programme provided in the investor's project and the zone in which the investor's project is located. The details are summarised below:

1. **Human resource development programme related to science and technology** – The investor must cooperate with educational institutions or others in a manner approved by the BOI. For instance, in the areas of talent mobility, work-integrated learning, and dual vocational training.
2. **Location of the BOI project** – The investor's project must be located in Chachoengsao, Chonburi, or Rayong Provinces, and in any of the following designated zones:
   A. Investment incentive zones for special activities ("Zone A")
      - Eastern Airport City ("EECa")
      - The Eastern Economic Corridor of Innovation ("EECi")
      - Digital Park Thailand ("EECd")
      - The Medical Hub of Thammasat University in Pattaya ("EECmd")

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Government incentives

B. BOI-promoted industrial estates or industrial zones ("Zone B")

The tax incentives offered to qualifying investors in the EEC area are summarised in the table below:

Targeted industries	Standard tax incentives	Additional tax incentives		
		Human resource development programme	Location of BOI project	
			Zone A	Zone B
A1, A2	8-year CIT exemption	+ 50% reduction in CIT for 3 years	+ 50% reduction in CIT for 2 years	-
A3	5-year CIT exemption	+ 50% reduction in CIT for 3 years	+ 50% reduction in CIT for 2 years	+ 1-year CIT exemption
Section 8 and Activities combining with Section 8	10-year CIT exemption	+ 2-year CIT exemption	+ 1-year CIT exemption	+ 1-year CIT exemption

*"CIT" = corporate income tax

Please note that applications to receive these rights and incentives must be submitted to the BOI from 2 January 2020 to the last working day of the BOI in 2021, except applications for incentives under the Zone A criteria, which can be submitted to the BOI, and for which there is no deadline.

Remarks:

Applications to receive the rights and incentives under these EEC measures must be submitted to the BOI by 30 December 2021 except applications for incentives under the Zone A, which can be submitted to the BOI without the deadline.

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Government incentives

Criteria for project approval

Before the project is eligible for BOI incentives, it will need to be approved by the BOI. In the approval process the following criteria are used:

1. Development of competitiveness in agricultural, industrial and service sectors
   - Have added value of at least 20% of revenues, except for projects in agriculture and agricultural products, electronic products and parts, and coil centres, which must have added value of at least 10% of revenues.
   - Use modern production processes.
   - Projects that have investment capital of THB 10 million or more (excluding the cost of land and working capital) must obtain ISO 9000 or ISO 14000 certification or similar international standard certification within 2 years of the date of commencing full operations. Otherwise, the exemption period for corporate income tax shall be reduced by 1 year.
   - For concession projects and the privatisation of state enterprise projects, the criteria must be based on the Cabinet's decisions in 1998 and 2004 – the state enterprise cannot apply for investment promotions, a build-transfer-operate or build-operate-transfer project can be promoted only if it is approved by the BOI before the bidding process takes place, and a build-own-operate project and a state enterprise after privatisation can be promoted.

Criteria for granting approval for imported used machinery

Types of machinery	Can be used	Counted as investment capital	Exemption from import duty
New machinery	✓	✓	✓
Not over 5 years old* (from manufacturing year to importing year)	✓	✓	–
Over 5 years old up to 10 years old (only metal stamping machinery)*	✓	✓	–

* Must obtain a machinery performance certificate from trusted institutes identifying machinery efficiency, environmental impact, energy usage, and fair value.

2. Environmental protection
   - Adequate and efficient guidelines and measures to protect the environment and to reduce environmental impact must be installed. The BOI will give special consideration to the location and pollution treatment measures of a project with a potential environmental impact.
   - Projects or activities of a type and size that are required to submit environmental impact assessments must comply with related environmental laws and regulations or Cabinet resolutions.
   - Projects located in Rayong Province must comply with Office of the Board of Investment Announcement No. Por 1/2554.
3. Minimum capital investment and project feasibility
   - The minimum capital investment requirement of each project is THB 1 million (excluding the cost of land and working capital). For knowledge-based services, such as creative product design and development centres, electronic design, software, R&D and engineering design, the minimum capital investment requirement is based on the minimum salary expense for

personnel in the specified field of at least THB 1.5 million a year, according to the conditions for each activity.

- For newly established projects, the debt-to-equity ratio must not exceed 3 to 1. Expansion projects must be considered on a case-by-case basis.
- Projects with an investment value of over THB 750 million (excluding the cost of land and working capital) must submit a feasibility study.

International Business Centre (IBC)

In response to the Harmful Tax Practices -2017 Progress Report on Preferential Regimes (Inclusive Framework on Base Erosion and Profit Shifting (BEPS): Article 5), the Cabinet approved the repeal of existing ROH Scheme I, ROH Scheme II, as well as the IHQ and ITC regimes, replacing them with the International Business Centre (IBC) scheme. An IBC is defined as a company incorporated under Thai law to conduct the business of providing management services, technical services, supporting services, or treasury centre services to its associated enterprise, whether located in Thailand or abroad, or to conduct the business of international trading.

Tax incentives

Under the Royal Decree No. 674 issued on 25 December 2018, qualified IBCs will receive the following tax incentives:

1. A reduction of the corporate income tax rate to 8%, 5%, or 3% on the types of income listed below, provided that the IBC meets the minimum local spending requirements of THB 60 million, THB 300 million, or THB 600 million, respectively.
   - Income received from the provision of services or treasury centre services to associated entities incorporated under Thai or foreign law.
   - Royalty income derived from all associated entities (both in Thailand and abroad).
2. A withholding tax exemption on dividends paid from associated entities (both in Thailand and abroad).
3. A specific business tax exemption for income received from the provision of treasury centre services to associated entities incorporated under Thai or foreign law.
4. A flat personal income tax rate of 15%, reduced from the normal maximum progressive rate of 35%, will apply to the employment income of an expatriate employee of the IBC.
5. A corporate income tax exemption on dividend income and interest income which associated entities incorporated under foreign law receive from the IBC.

Conditions

1. IBCs must be incorporated under Thai law, and have paid-up capital of at least THB 10 million at the end of the accounting period.
2. IBCs must have annual operating expenses of at least THB 60 million that are paid to Thai recipients. However, an existing ROH or IHQ which chooses to convert its status to an IBC does not have to meet this condition.
3. IBCs must have at least 10 employees (at least 5 employees for a treasury services centre).

Industrial Estate Authority of Thailand act

As a state enterprise under the Ministry of Industry, the Industrial Estate Authority of Thailand (IEAT) is responsible for the development and establishment of industrial estates, where factories for various industries are orderly and systematically clustered together. The IEAT also serves as a governmental mechanism to decentralise industrial development to provincial areas throughout the country. Industrial estates are divided into two zones: General Industrial Zones (GIZ) and I-EA-T Free Zone (FZ).

Investment in a General Industrial Zone (GIZ)

Investors in a GIZ are eligible for the following opportunities, options, and privileges:

1. Permission to conduct service businesses in the GIZ

   The IEAT offers industrial operators in a GIZ comprehensive services essential for industrial operations - such as transportation, warehouses, training centres, and clinics.
2. Non-tax privileges for operators in a GIZ
   - The right to own land in an industrial estate
   - The right to bring in foreign skilled workers, plus their spouses or dependents
   - The right to remit money abroad

Focus on
Government incentives

Investment in an I-EA-T Free Zone (FZ)

Under the most recent Industrial Estate Authority of Thailand Act, investors in an FZ are entitled to additional tax and other privileges, including the following:

1. Operators in an FZ are afforded the privilege of exporting products without any restrictions, and with the added convenience of being able to bring merchandise or raw materials into an FZ.
2. Supplies taken into an FZ are entitled to certain additional tax and duty privileges, such as:
    - Tax burden relief for products taken out of an FZ for domestic use or consumption. Contrary to the previous Act, raw material components, if produced domestically, can be granted tax and duty exemptions.
    - Operators in an FZ remain entitled to claim privileges specified in the previous Industrial Estate Authority of Thailand Act. These include:
        - Tax privileges, including import/export tax and duty exemptions, as well as exemptions from VAT and excise tax on machinery, equipment, components, raw materials, and supplies used for the production of goods and other merchandise.
        - General privileges, such as the right to own land, the ability to bring in technical experts (and family members and dependents), as well as the ability to remit foreign currency to their home countries.

Petroleum laws

To develop Thailand's natural resources, the Petroleum Act and the Petroleum Income Tax Act of Thailand offer special incentives in relation to petroleum surveying, exploration, and production.

Petroleum - related investment incentives include:

1. Import duty - imported machinery, spare parts, and materials required for business or for the use of drilling and oil field service contractors are exempt from tariffs.
2. Land ownership - the business is permitted to own land used for its operation.
3. Immigration - relaxed work permits and visa rules exist for foreign experts, technical staff and their dependents, including contractors.
4. Other incentives - the government will not restrict the export of petroleum, except in very exceptional circumstances, and will also provide a guarantee that it will not nationalise any private industrial activity.

Corporate income tax incentives

Research & Development costs

Under the Research & Development (R&D) provisions of income tax legislation, companies or legal partnerships may take a double corporate tax deduction for payments made for eligible R&D costs to governmental or private agencies that are approved providers of R&D services. In addition, for machinery and equipment acquired for use in R&D activities, an initial depreciation allowance of 40% of the cost is granted on the date of its acquisition, and the residual value can be depreciated over its effective life (but not less than 5 years).

Staff training

Under Royal Decree No. 437, companies or legal partnerships may take a double corporate tax deduction for costs incurred for training employees at certain educational or vocational training institutions, as well as for costs incurred for organising approved in-house training for their employees.

Focus on

Business entities available to foreigners

Focus on

Business entities available to foreigners

Thailand recognises several types of legal business entities including partnerships, limited companies, unincorporated joint ventures, and other forms of corporate entities.

Partnerships

There are three types of partnerships in Thailand, differing principally by the liability attached to each.

1. Unregistered ordinary partnerships have partners that are jointly and wholly liable for all obligations of the partnership. This form of partnership is not a legal entity, and therefore, for tax purposes, is treated as an individual.
2. Registered ordinary partnerships that are registered with the Commercial Registrar are legal entities, separate and distinct from the individual partners, and are taxed as a corporate entity.
3. Limited partnerships consist of one or more partners, whose individual liability is restricted to the amount of capital contributed to the partnership, and one or more of the partners will be jointly liable, without any limitation, for all obligations of the partnership. A limited partnership must be registered, and is taxed as a corporate entity.

Limited companies

There are two types of limited companies - private limited companies and public limited companies. The first is governed by the Civil and Commercial Code, the second by the Public Limited Company Act.

Private limited company

A Thai private limited company has basic characteristics similar to Western corporations. A private limited company is formed through a process that leads to the registration of a Memorandum of Association (Articles of Incorporation) and Articles of Association (By-laws). These are the company's registered constitutive documents.

Public limited company

The procedures for setting up a public limited company are similar to those for a private limited company. A Thai public limited company may, subject to compliance with the prospectus, Securities and Exchange Commission (SEC) approval and other requirements, offer shares, debentures, and warrants to the public, and may apply to have its securities listed on the Stock Exchange of Thailand (SET).

Focus on
Business entities available to foreigners

The table below illustrates the different procedures involved in establishing a private limited company and a public limited company:

	Private limited company	Public limited company
Minimum number of natural persons as promoters	3	15
Minimum number of shareholders required at all times	3	15
Minimum number of directors	1	5
Public subscription of shares by prospectus	Not allowed	Allowed*
Public subscription of debentures by prospectus	Allowed*	Allowed*
Registration fee	THB 5,500	THB 2,000-300,000

* Subject to SEC approval.

Appointing directors

Every company must appoint at least one director to act as an agent of the company. The number of directors of a private company is not fixed under Thai law, but set by the shareholders' general meeting. A director is appointed or removed only by a general meeting of shareholders. For public companies, there must be at least five directors, of which three must be Thai nationals.

The directors are jointly responsible for ensuring that payment for shares by the shareholders is actually made, as well as for the proper distribution of any dividend or interest, as prescribed by Thai law. In addition, the directors have a statutory obligation to keep the books and documents prescribed by Thai law, and to enforce the resolutions of general meetings.

Unincorporated joint ventures

An unincorporated joint venture may be described, in accordance with general practice, as a group of persons (resident and/or non-resident) entering into an agreement in order to conduct a business activity together. It is not yet recognised as a legal entity under the Thai Civil and Commercial Code. However, income from an unincorporated joint venture is subject to corporate taxation under the Thai Revenue Code, which classifies it as a single entity.

Other forms of corporate entities

Branch of a foreign corporation

Foreign companies may carry out certain business activities in Thailand through a branch office. Branch offices are required to maintain accounts only relating to the branch that is established in Thailand. It is important to clarify before establishing a branch what constitutes income subject to Thai tax. This is because the Revenue Department may consider revenues directly earned by the foreign head office from sources within Thailand as being subject to Thai tax.

One of a key condition for approval of a foreign business licence for a branch of a foreign corporation is that minimum capital of at least THB 3 million or average of 25% of 3 years estimated expenses whichever is higher must be brought into Thailand. This amount may be subject to change in subsequent Ministerial Regulations.

Focus on

Business entities available to foreigners

Representative office of a foreign corporation

Foreign corporations may establish representative offices in Thailand to engage in limited activities that do not generate revenue. These activities are restricted to:

1. Sourcing of goods or services in Thailand for the head office
2. Inspecting and controlling the quality of goods that the head office purchases in Thailand
3. Providing advice in various fields relating to products directly sold by its head office to local distributors or consumers
4. Disseminating information about new products and services of the head office
5. Reporting to its head office on local business developments and activities

The minimum capital contribution of THB 3 million for branches also applies to representative offices for immigration purposes.

Focus on

Setting up and running business entities

Focus on

Setting up and running business entities

Corporate registration procedures

Limited company

1. Before forming a limited company, the chosen corporate name must first be registered and approved by the Thai Commercial Registrar.
2. A Memorandum of Association must be filed, which contains the approved name of the company, its business address, its objectives, the personal details about the promoters and the shares subscribed for by each, and data on the authorised capital of the company.
3. The next step is to hold a statutory meeting of shareholders, during which:
    - the articles of incorporation and by-laws are approved;
    - the board of directors is elected;
    - the transactions and expenditures of the founders are ratified; and
    - the authorised auditor is appointed.
4. The directors may then register the company with the Commercial Registrar

A limited company that has registered capital of more than THB 5 million must file evidence issued by a commercial bank to prove that share payments have been made to the company's bank account no later than 15 days after incorporation.

Branch, representative office, and regional office

Prior to the new Ministerial Regulations of the Department of Business Development becoming effective in May 2017, foreign corporations wishing to do business in Thailand through a branch, representative office, or regional office had to submit certain required documents, including the application for a foreign business licence.

Currently, in order to set up a representative office or regional office, it is only necessary to apply for a company registration number and corporate taxpayer number from the governmental authorities. However, in order to set up a branch office, it is still necessary to apply for a foreign business licence (except for a branch office which has contracts with the governmental authorities or a state enterprise to render service activities).

Public securities

In order to offer newly issued securities for sale to the public, companies must apply for approval from the Securities and Exchange Commission (SEC), complying with the rules and regulations issued by the SEC Board according to the Securities and Exchange Act, 2535 B.E. However, existing securities can be offered for sale without the SEC's approval, on the condition that the company discloses information to the SEC prior to offering those securities for sale. Before offering securities to the public, the company or existing shareholders will generally need to file a registration statement and a draft prospectus with the SEC. This is in order to provide information to potential investors.

Focus on

Setting up and running business entities

Tax registration

An individual person who is subject to Thai personal income tax and has no Thai identification number (such as an expatriate employee) must obtain a tax identification number from the Thai Revenue Department within 60 days of the date of deriving taxable income.

A legal entity which is subject to corporate income tax, except for Thai incorporated companies which have a 13-digit registration number issued by the Ministry of Commerce, must obtain a tax identification number from the Thai Revenue Department within 60 days of the date of commencing business in Thailand.

All entities that have annual turnover exceeding THB 1.8 million must register for VAT within 30 days of the annual turnover exceeding the threshold, unless specifically exempt.

It is possible to apply for VAT registration before the date of commencing business under conditions specified by the Director-General of the Thai Revenue Department.

Licensing a factory

The Factory Act, 2535 B.E. (1992), divides factories into three groups:

1. **Group 1** – factories that can function immediately without licensing.
2. **Group 2** – factories for which notification to officials is required only prior to the start of operations. Operators may commence operations upon acquiring a receipt from the Ministry stating that their report has been received.
3. **Group 3** – factories for which a factory licence is required before the establishment of the factory.

Before the establishment of a factory under Group 3, the operator must obtain a factory licence from the Department of Industrial Works, Ministry of Industry. The operator of a Group 3 factory must notify the authorities at least 15 days before a factory test-run commences, and again 15 days before actual manufacturing operations start.

At present, the factory licence does not expire until the factory ceases doing business. While the factory licence is valid, the licensee must pay an annual fee for the licence, as determined by the authorities.

Prior permission from the Ministry of Industry must be obtained for any factory expansion, transfer of machinery to other sites, or transfer of a factory site, as well as to transfer, lease, assign, or sell a factory operation.

Audit and accounting requirements

The financial statements of a legal entity, including a limited company, registered partnership, branch office, representative office, and unincorporated joint venture, must be audited by a Thai certified public accountant and submitted to the Revenue Department and the Department of Business Development for each accounting year. The audited financial statements must be prepared in compliance with Thai Accounting Standards, and approved by the shareholders in a general meeting within four months of the end of the accounting period.

Companies listed on the Stock Exchange of Thailand or the Market for Alternative Investment in Thailand must also prepare financial statements which must be reviewed by Thai auditors on a quarterly basis.

Shareholding by non-residents

Shareholders in a Thai company can be residents of any country. However, some specific business activities limit the percentage of foreign ownership, as detailed in the Foreign Business Act 1991.

Labour law

Thailand's employment laws, administered by the Department of Labour, Protection, and Welfare, set out working conditions, such as maximum work hours, holidays, sick leave, the minimum wage, and severance pay. The laws, which may significantly affect a firm's decision to do business in Thailand, also give employers some flexibility with regard to managing labour, such as staff recruitment processes, retrenchment policies, and employee transfers.

The maximum number of work hours is eight a day, or 48 a week. The exception is when work is deemed by law to be hazardous, in which case working hours are limited to seven hours a day, or 42 a week. Overtime compensation must be paid at a rate of between 1.5 to 3 times the normal hourly rates to qualified employees. Employees are entitled to a minimum of 13 national holidays a year, plus a minimum of six vacation days after one year of consecutive work.

Thirty annual paid sick days is standard. An employer may require a doctor's certificate for sick leave that is three consecutive days or more.

Female employees are entitled to 98 days of maternity leave, including 45 days of paid leave.

We note that maternity leave has been clarified to include leave taken to visit doctors for prenatal care and will now be capped at 98 days per pregnancy inclusive of holidays.

Currently, the employer arranges for a certain number of days of business leave for the employee with or without pay as the employer deems appropriate.

The government has set, with effective from 1 January 2020, the minimum wage of THB 331 a day for Bangkok and the surrounding area, THB 336 a day for Phuket and Chonburi, THB 335 a day for Rayong, and THB 313 a day for Narathiwat, Pattani, and Yala.

As a result of the minimum wage increase, the minimum monthly salary of Thai staff listed in the monthly tax return (Form PND.1) submitted to the Revenue Department, and in Forms SPS.1-10 submitted to the Social Security Office, must be changed based on a company's registered address (for example, the minimum wage for office staff is Bangkok should be raised from THB 9,750 to THB 9,930 a month).

Staff recruitment and transfers

Employers often recruit staff through advertisements in either Thai or English-language newspapers, and there are several domestic and international personnel recruitment services. Employers may specify criteria, such as preferences for an applicant's age and gender. Employers have the right to transfer staff to other locations, providing the transfer is not ordered with the intent to create personal hardship. An employee's refusal to transfer is legal cause for dismissal.

Social security contributions

The Social Security Act requires all employers to withhold social security contributions of 5% from the monthly salary of all employees, up to a maximum of THB 750 (approximately USD 25) per person a month. Employees registered for social security may file compensation claims for injury, illness, disability, or death if it is not a consequence of work performance, as well as for childbirth, child welfare, retirement, and unemployment.

Severance pay

Severance pay upon termination of the employment agreement is mandatory. The amount is determined based on the length of service and the current salary. If business conditions necessitate cutbacks, firms have freedom in determining retrenchment policies. There is no 'first in, last out' requirement in Thailand.

The amount of severance pay ranges from 30 days' wages for 120 days or more of service to 400 days' wages for 20 years or more years of service.

Workmen's compensation

The Workmen's Compensation Act requires an employer to provide benefits at rates prescribed by law for employees who suffer injury, illness, or death while performing their work. In general, the compensation amount is paid monthly at a rate of 60% of monthly wages, between a minimum of THB 2,000 (approximately USD 67) and a maximum of THB 9,000 (approximately USD 300) a month. Actual and necessary medical expenses must be paid up to THB 35,000 (approximately USD 1,167) for normal cases and THB 50,000 (approximately USD 1,667) for a serious injury.

Work regulations

Employers who have 10 or more employees must draw up work regulations and announce them with the employees. The work regulations must contain provisions on working conditions, leave, discipline, submission of grievances, and termination of employment.

Protection of intellectual property

Copyright

The Copyright Act protects works in the categories of literary work, including computer programs; dramatic, artistic, and musical work; audio-visual material, cinematic films or recorded material; disseminated pictures or disseminated audio; or any other works in the fields of literature, science, or the fine arts.

Copyright belongs to the creator of a work, subject to the following conditions:

1. For unpublished work, the creator must be of Thai nationality or reside in Thailand, or be a national of or reside in a country which is a member of the Convention on the Protection of Copyright, of which Thailand is a member, provided that the creator spends all or most of the time residing in Thailand on the creation of the work.
2. For published work, the first publication must be made in Thailand or in a country that is a member of the Convention on the Protection of Copyright. If the first publication was made outside of Thailand or in a country which is not a member of the Convention, the work created must have been published in Thailand or in a country which is a member of the Convention within 30 days of the first publication. Alternatively, the creator must have met the criteria set out in the paragraph above at the time that the work was first published.

Copyright is valid for the period of the creator's life, plus an additional 50 years thereafter. Where the creator is a legal entity, the protection period is 50 years from the date of creation, or 25 years if the copyright application is for art. The following are not deemed eligible for copyright protection under the Act:

1. Daily news and facts that are, by nature, merely news items
2. The Constitution and laws
3. Announcements, orders, and regulations of ministries, bureaus, departments, or any other agency of the state or local jurisdiction
4. Court judgments, orders, rulings, and official reports
5. Translations and collections of items specified above, which are prepared by government agencies or local administrations

Thailand is a member of the Berne Convention for the Protection of Literary and Artistic Works. This allows certain copyrights registered in other Berne Convention countries to be enforced in Thailand.

Trademark

The Trademark Act of Thailand governs the registration and protection of trademarks. The Act defines a trademark as a symbol used in connection with goods, for the purpose of indicating that they belong to the owner of the trademark. The trademark must be distinctive, and not identical or similar to those registered by others.

Registration of a trademark may be completed by the trademark proprietor, or through an agent. Application for registration must be made on official forms duly signed either by the proprietor or the agent, and filed with the Trademark Office. If an application is approved, the registration will be published in the Official Journal. Once published, if not opposed, the proprietor has the exclusive right to use the registered mark on all of the products for which registration has been granted. Trademark registration is valid for 10 years from the date of application. It is renewable for an unlimited number of periods of 10 years each. Renewal of the registered trademark must be made 90 days before the date of expiration.

The Trademark Act allows the protection of service marks, service names, collective marks, certification marks, and trade names.

Patents

The Patent Act protects both inventions and product designs and pharmaceuticals. Thailand has numerous bilateral agreements enabling citizens of other countries to file patent applications in Thailand. However, Thailand is neither a signatory to the Paris Convention for the Protection of Industrial Property, nor a signatory of any other international convention for the reciprocal protection of patents.

Under the Patent Act, patents for inventions are valid for 20 years, and patents for designs are valid for 10 years.

The invention must be patentable by meeting the following requirements:

1. Being novel
2. Involving an inventive step
3. Capable of being made or used for some kind of production activity

Any patent that is widely published and/or patented or registered in a different place prior to the filing date of the Thai application is not patentable in Thailand. In addition, the following are not patentable in Thailand:

1. Microbes and any components thereof which exist naturally, such as animals, plants, and extracted substances from animals or plants
2. Scientific or mathematical rules or theories
3. Computer programs
4. Methods of diagnosis, treatment, and care of human and animal diseases
5. Inventions that are contrary to public order or morality, public health, or welfare

Focus on
Corporate taxes

Focus on

Corporate taxes

The principal taxation law of Thailand is the Revenue Code of 1938. In Thailand, taxes are collected in two ways. There are direct taxes (personal and corporate income taxes, and petroleum income tax) and indirect taxes (value-added tax, excise tax, customs duties, stamp duties, and specific business tax).

Generally, income tax in Thailand is by self-assessment, where tax declarations and payments are assumed to be correct. However, the Revenue Department has the power to audit taxes and taxpayers' financial records. Value-added tax (VAT) is collected upon the consumption of goods and services, and is also levied on imports.

Corporate income tax

Corporate income tax (CIT) is a direct tax levied on legal entities (companies) established under Thai law, as well as legal entities established under foreign law that conduct business in Thailand, or which derive certain types of income from Thailand.

The term "legal entity" means a legal company or partnership operating in Thailand. Companies incorporated in Thailand are subject to corporate income tax on all profits derived from both domestic and foreign sources. The term also includes any unincorporated joint venture, and any trading or profit-seeking activity conducted by a foreign government or its agency, or by any other legal body incorporated under foreign law.

Taxable entities

Corporate income tax is levied on both Thai and foreign companies. A Thai company means a company incorporated in Thailand. A Thai company is subject to tax in Thailand on its worldwide net profit at the end of each accounting period (12 months).

A foreign company means a company incorporated under foreign law. Generally, a foreign company is treated as conducting business in Thailand if it has an office, a branch, or any other place of business in Thailand, or if it has an employee, agent, or representative that is conducting business in Thailand. A foreign company conducting business in Thailand is subject to CIT only on net profit arising from, or as a consequence of, business conducted in Thailand at the end of each accounting period.

A separate profit remittance tax of 10% of the amount remitted is imposed on foreign companies that remit their Thailand-based profits offshore. Profits include any sum set aside out of profits, as well as any sum which may be regarded as profits.

A foreign company not conducting business in Thailand, but deriving certain types of income from Thailand, such as service fees, interest, dividends, rent, or professional fees, may be subject to CIT on the gross amount received. It is collected in the form of withholding tax, which the payer of income must deduct from the income at the rate shown in the section on withholding tax (payments to non-resident individuals and companies). A foreign company engaged in international transport is also subject to tax only on its gross receipts.

Fiscal year

The usual fiscal year for tax submission is for the 12-month period ending 31 December. However, with the consent of the Director-General of the Revenue Department, corporate taxpayers may choose an alternative accounting period for the purpose of determining taxable income.

Determining a company's taxable income

The CIT of a company conducting business in Thailand is calculated from the company's net profit on an accrual basis. A company must take into account all revenue arising from, or as a consequence of, the business conducted in an accounting period, and may deduct all expenses in accordance with the conditions set out in the Revenue Code.

Tax rates

1. The standard corporate income tax rate in Thailand is 20% of net profits.
2. A progressive tax rate applies to small and medium-sized enterprises (SMEs*), as follows:

Focus on
Corporate taxes

Net profit (Thai baht)	CIT rates
0-300,000	Nil
300,001 - 3,000,000	15%
Over 3,000,000	20%

(*An 'SME' means a company which has paid-up capital at the end of any accounting period not exceeding THB 5 million, and which has revenue from the sale of goods or the provision of services in any accounting period not exceeding THB 30 million.)

Foreign tax relief

For income derived from countries that do not have a Double Taxation Agreement (DTA) with Thailand, foreign tax credits are allowed. These foreign tax credits are subject to certain criteria and conditions, and can be taken up to the amount of Thai tax that would have been payable had the income been derived in Thailand. The same rules apply in regard to foreign tax relief for DTA countries.

Losses and consolidation

Each company is taxed as a separate legal entity. Losses incurred by one affiliate may not be offset against profits made by another affiliate. Losses can only be carried forward for a maximum of five years.

Dividends

Dividends received by a company listed on the Stock Exchange of Thailand are exempt from tax. Exemptions also apply to dividends received by any other company incorporated in Thailand that holds at least 25% of the voting shares in another Thai company, without any cross shareholding, either directly or indirectly, provided that the related investments have been held for a period of at least three months before and three months after the receipt of the dividends. Where a Thai company does not qualify for the shareholding period specified, it will nevertheless only need to include in its assessable income an amount of 50% of a dividend received from another company incorporated in Thailand.

Dividends paid by a foreign company to a Thai company are exempt from Thai CIT if:

1. the highest corporate tax rate of the foreign jurisdiction from which the dividend is received is at least 15%;
2. the Thai company has a 25% or more equity interest in the foreign entity; and
3. the Thai company maintains its shareholding in that company for a 6-month period.

New transfer-pricing law

On 21 November 2018, Amendment No. 47 to the Revenue Code in regard to transfer pricing was published in the Royal Gazette.

The key aspects of the new transfer-pricing law are as follows:

1. The Revenue Department's tax auditors are granted the authority to adjust corporate taxpayers' revenue and expenses in relation to related-party transactions that were not at arm's length according to the rules, procedures, and conditions set out in the related Ministerial Regulation.
2. The term "related party" is defined as: (a) a legal entity that either directly or indirectly holds 50% or more of the total shares of another legal entity; (b) a legal entity of which 50% or more of its total shares are held either directly or indirectly by a shareholder or partner that also directly or indirectly holds 50% or more of total shares of another legal entity; or (c) a legal entity that has a dependent relationship with another legal entity in terms of capital, management, or control, to the extent that one entity cannot be operated independently from the other.
3. To relieve the double tax resulting from such adjustments, taxpayers who are deemed to have overpaid taxes on related-party transactions as a result of a transfer-pricing assessment will have the right to file a request for a tax refund within three years of the deadline for filing an annual corporate income tax return or 60 days of receiving notification of the tax assessment results, whichever is later, according to regulations set out by the Director-General.

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Corporate taxes

4. Taxpayers who are deemed to be related parties under the definition, and which have annual turnover exceeding THB 200 million, are required to prepare and file a transfer-pricing disclosure form together with their annual corporate income tax return. This form requires taxpayers to disclose relationships with related parties and the total value of related-party transactions during the accounting period.
5. The Revenue Department's tax auditors are granted the authority to request transfer-pricing documentation from taxpayers within five years of the report being filed. Taxpayers must submit such documentation within 60 days of receiving notice to do so from the tax auditors, with a possible extension to 120 days upon request. The transfer-pricing documentation is due 180 days after receiving a notification from the Thai Revenue Department for the first time.
6. Taxpayers that fail to submit the transfer-pricing disclosure form or transfer-pricing documentation by the due date, or that submit the form or documentation with incorrect or incomplete information, are subject to a maximum fine of THB 200,000.

The Ministerial Regulations specifying the calculation of revenue and expenses of a related entity and determining the format and details of the transfer pricing documentation are expected to be issued soon. In addition, the Revenue Department may also issue the Ministerial Regulations specifying exemptions and the revenue threshold for preparing and filing a transfer-pricing disclosure form.

Focus on
Personal taxation

Focus on

Personal taxation

Personal income tax (PIT) is a direct tax levied on the taxable income of a person. A person is defined as an individual, an ordinary partnership, a body of persons that is not a legal entity, a deceased person, and an undivided estate.

In general, a person liable to PIT must calculate his tax liability, file tax returns, and pay tax, if any, on a calendar-year basis. Taxpayers are classified as either "residents" or "non-residents".

A resident is any person residing in Thailand for a period, or periods, for a total of 180 days or more in any tax (calendar) year. A resident of Thailand is liable to pay tax on income from sources in Thailand on a cash basis, regardless of where the money is paid, and on the portion of income from foreign sources that is brought into Thailand in the same year that the foreign income is derived.

A non-resident is only subject to tax on income from sources in Thailand.

Taxable income

Income on which PIT is due is called "assessable income". The term covers income both in cash and in kind. This means that any benefits provided by an employer or other persons, such as rent-free housing, or the amount of tax paid by the employer on behalf of the employee, will also be treated as assessable income of the employee for PIT purposes.

Assessable income is divided into eight categories. Certain deductions and allowances can be offset against assessable income to calculate taxable income. Taxpayers must make deductions from assessable income before the allowances are granted.

Types of income	Deductions
1. Income from employment	50%, but not exceeding THB 100,000
2. Income from independent personal services	50%, but not exceeding THB 100,000
3. Income from goodwill, copyright, and other rights	50%, but not exceeding THB 100,000
4. Interest income, dividends, and capital gains	N/A
5. Income from letting out property	
• buildings and wharves	Actual expenses or 30%
• agricultural land	Actual expenses or 20%
• all other types of land	Actual expenses or 15%
• vehicles	Actual expenses or 30%
• any other type of property	Actual expenses or 10%
6. Income from professional services (law, medical practice, engineering, architecture, accountancy, and fine arts)	Actual expenses or 30%, except for the medical profession, where 60% is allowed

Types of income	Deductions
7. Income from the hire of work where the taxpayer is obliged to provide essential materials besides tools	Actual expenses or 60%
8. Income from business, commerce, agriculture, industry, transport, or any other activities not specified	Actual expenses or between 40% and 60%, depending on the types of income

Tax rates for resident and non-resident individuals

Taxable income (Thai baht)	Tax rate	Tax amount (Thai baht)	Accumulated tax (Thai baht)
0 - 150,000	0%	-	-
150,001 - 300,000	5%	7,500	7,500
300,001 - 500,000	10%	20,000	27,500
500,001 - 750,000	15%	37,500	65,000
750,001 - 1,000,000	20%	50,000	115,000
1,000,001 - 2,000,000	25%	250,000	365,000
2,000,001 - 5,000,000	30%	900,000	1,265,000
5,000,001 and over	35%		

Persons over the age of 65 are granted an exemption on the first THB 190,000 of taxable income instead of the normal THB 150,000 threshold.

Separate taxation

There are several types of income that a taxpayer may elect to have assessed separately.

Income from the sale of immovable property

Special rules apply to calculating gains on the sale of immovable property. This may allow a taxpayer to pay a final withholding tax to the Land Department in lieu of including the gain made on the sale as normal assessable income.

Interest

Interest income may, at the taxpayer's choice, be excluded from the PIT calculation, if that tax at 15 per cent is withheld at source. However, the following forms of an individual's interest income are exempt from any tax:

1. Interest on bonds or debentures issued by a governmental organisation,
2. Interest on savings deposits in commercial banks if the aggregate amount of interest received is not more than THB 20,000 during a taxable year.

Focus on
Personal taxation

Dividends

A resident individual taxpayer that derives dividends has a choice of including the dividend in PIT-assessable income or paying a final withholding tax at 10% and excluding that dividend from their income. Taxpayers who choose the first option must gross up the dividend to include the 10% withholding tax deducted, as well as the company tax paid on that dividend. However, a tax credit is granted for both the withholding tax and company tax deducted.

PIT filing and payment

A taxpayer is liable to file a PIT return (Form PND 90 or 91) and make a payment to a district Revenue Department office by the last day of March following the taxable year. A taxpayer who derives income in categories 5 to 8 (listed earlier in this section) during the first six months of the taxable year is also required to file a half-year return (Form PND 94), and to make a payment to a district Revenue Department Office by the last day of September of that taxable year. Any withholding or half-year tax that has been pre-paid can be used as a credit against the year-end tax liability.

Focus on
Withholding tax

Focus on
Withholding tax

Payments to resident individuals

For certain categories of income, the payer of income must withhold tax at source, file the necessary return (Form PND 1, 2, or 3) and submit the amount of tax withheld to the district Revenue Department office.

The tax withheld is then credited against the tax liability of the taxpayer when the tax return is filed. The table below shows the withholding tax rates for some categories of income:

Types of income	Withholding tax rate
1. Employment income/independent personal services	0% to 35%
2. Interest[1]	15%
3. Dividends	10%
4. Royalties	0% to 35%
5. Rent[1]	5%
6. Prizes	5%
7. Hire of work and professional services[1]	3%
8. Public entertainer remuneration	5%
9. Advertising fees[1]	2%
10. Capital gain[2]	0% to 35%

1. Not applicable if an individual is the payer of income
2. Not applicable for the sale of shares on the SET

Payments to resident companies and branches of foreign companies

Certain types of income paid to companies are subject to withholding tax at source. The withholding tax rates depend on the types of income and the tax status of the recipient. The payer of income is required to file a tax return (Form PND 53) and submit the amount of tax withheld to the district Revenue Department office within the first seven days of the month following that in which the payment was made. The tax withheld is credited against the final tax liability of the taxpayer. Governmental agencies are required to withhold tax at the rate of 1% on all types of income paid to Thai companies. The table below sets out the withholding tax rates on some important types of income:

Focus on
Withholding tax

Types of income	Withholding tax rate
1. Interest	10% if paid to associations or foundations, or 1% in other cases
2. Dividend	10%
3. Royalty	10% if paid to associations or foundations, or 3% in other cases
4. Rent	10% if paid to associations or foundations, or 3% in other cases
5. Prize	5%
6. Service and liberal profession	3%
7. Hire of work	3% if paid to a Thai company or a foreign company that has a permanent branch in Thailand; 5% if paid to a foreign company without a permanent branch in Thailand.
8. Advertising fee	2%

Payments to non-resident individuals and companies

Apart from dividends, for which a 10% withholding tax must be paid, a 15% withholding tax must be paid for most other payments applicable to a non-resident that resides in a non-DTA country (including interest, royalties, rent, management fees, consultancy payments, and capital gains). However, Thailand has concluded DTAs with many countries. The withholding tax rates may therefore be reduced, depending on the applicable DTA (see the following section on Double Taxation Agreements).

Focus on
Double taxation agreements

Focus on

Double taxation agreements

Thailand concluded its first double tax agreement (DTA) with Sweden in 1963. The Thai DTA network continues to be expanded and updated.

DTAs apply to persons (including individuals and corporate entities) which are residents of either one or both of the respective Contracting States. In order to be classified as a Thai resident and to be entitled to DTA benefits, a person must be one of the following:

1. An individual who stays in Thailand for a period (whether consecutive or not) of 180 days or more in a calendar year.
2. A company or other legal entity that is incorporated restablished under the laws of Thailand.

Taxes covered by DTAs

DTAs apply only to income taxes – namely, personal income tax, corporate income tax, and petroleum income tax. Other indirect taxes, such as VAT and specific business tax (SBT), are not covered by DTAs.

Types of income

In general, a DTA does not stipulate an exact tax rate that applies to a specific item of income. Instead, it states whether the source country or resident country is entitled to tax certain income. If the source country has taxing rights, the income will be subject to tax under the domestic laws of that country.

The DTA also prescribes a maximum tax rate applicable to investment income – namely, dividends, interest, and royalties. This means that the source country can tax investment income at a rate not exceeding that set out in the DTA. In many cases, tax rates in a DTA are lower than domestic tax rates, in order to reduce tax impediments for cross-border trade and investments.

Some Articles of DTAs clearly do not allow the source country to exercise taxing rights on certain income, such as income from international air transport, and income from general management and administrative services (business profits), provided such a business is not conducted through a permanent establishment (PE) in the source country.

Tax rates

Withholding tax is generally applied at a rate of 10% for dividends, and 15% for interest and royalties. However, for some DTA countries, the lower withholding tax rate is provided, on the condition that the recipient of dividends, interest, and royalties does not have a PE or fixed base in Thailand. The following table sets out the general tax applicable to dividends, interest, and royalty payments under Thailand's DTAs:

Focus on
Double taxation agreements

	Dividends (1)	Interest (2)	Royalties (3)
Armenia	10%	10%, 15%	15%
Australia	10%	10%, 15%	15%
Austria	10%	10%, 15%	15%
Bahrain	10%	10%, 15%	15%
Bangladesh	10%	10%, 15%	15%
Belarus	10%	10%, 15%	15%
Belgium	10%	10%, 15%	5%, 15%
Bulgaria	10%	10%, 15%	5%, 15%
Cambodia	10%	10%, 15%	10%
Canada	10%	10%, 15%	5%, 15%
Chile	10%	10%, 15%	5%, 15%
China	10%	10%, 15%	15%
Cyprus	10%	10%, 15%	5%, 10%, 15%
Czech Republic	10%	10%, 15%	5%, 10%, 15%
Denmark	10%	10%, 15%	5%, 15%
Estonia	10%	10%, 15%	8%, 15%
Finland	10%	10%, 15%	15%
France	10%	3%, 10%, 15%	5%, 15%
Germany	10%	10%, 15%	5%, 15%
Hong Kong	10%	10%, 15%	5%, 10%, 15%
Hungary	10%	10%, 15%	15%
India	10%	10%	10%
Indonesia	10%	10%, 15%	15%
Ireland	10%	10%, 15%	5%, 10%, 15%
Israel	10%	10%, 15%	5%, 15%
Italy	10%	10%, 15%	5%, 15%
Japan	10%	10%, 15%	15%
Korea	10%	10%, 15%	15%
Kuwait	10%	10%, 15%	15%
Laos	10%	10%, 15%	15%
Luxembourg	10%	10%, 15%	15%
Malaysia	10%	10%, 15%	15%

Focus on
Double taxation agreements

	Dividends (1)	Interest (2)	Royalties (3)
Mauritius	10%	10%, 15%	15%, 15%
Myanmar	10%	10%, 15%	5%, 10%, 15%
Nepal	10%	10%, 15%	15%
The Netherlands	10%	10%, 15%	15%, 15%
New Zealand	10%	10%, 15%	10%, 15%
Norway	10%	10%, 15%	5%, 10%, 15%
Oman	10%	10%, 15%	15%
Pakistan	10%	10%, 15%	10%, 15%
Philippines	10%	10%, 15%	15%
Poland	10%	10%, 15%	5%, 15%
Romania	10%	10%, 15%	15%
Russia	10%	10%, 15%	15%
The Seychelles	10%	10%, 15%	15%
Singapore	10%	10%, 15%	5%, 8%, 10%
Slovenia	10%	10%, 15%	10%, 15%
South Africa	10%	10%, 15%	15%
Spain	10%	10%, 15%	5%, 8%, 10%
Sri Lanka	10%	10%, 15%	15%
Sweden	10%	10%, 15%	15%
Switzerland	10%	10%, 15%	5%, 10%, 15%
Taiwan	5%, 10%	10%, 15%	10%
Tajikistan	10%	10%	5%, 10%
Turkey	10%	10%, 15%	15%
The Ukraine	10%	10%, 15%	15%
The United Arab Emirates	10%	10%, 15%	15%
The United Kingdom	10%	10%, 15%	5%, 15%
The United States of America	10%	10%, 15%	5%, 8%, 10%
Uzbekistan	10%	10%, 15%	15%
Vietnam	10%	10%, 15%	15%

1. The lower rate generally applies if certain conditions are met, including having a specified minimum percentage of equity in the company paying the dividend.
2. The lower rate generally applies to interest for which a financial institution is beneficially entitled.
3. The lower rate generally applies to payments made as consideration for the right to use any copyright of literary, artistic, or scientific work.

Focus on

Sales, VAT, and other taxes

Focus on
Sales, VAT, and other taxes

Value-added Tax (VAT)

VAT replaced sales ta on 1 January 1992. VAT is an indirect tax imposed on the value added at each stage of production and distribution.

Any person or entity that regularly supplies goods or provides services in Thailand, and has an annual turnover exceeding THB 1.8 million, is subject to VAT in Thailand. A supplier of services to an offshore entity will also have to pay VAT if the services are used in Thailand. VAT also applies to any import of goods or services. Suppliers of goods and services collect output VAT. Purchasers of goods and services pay input VAT. Input VAT is deducted from output VAT to determine VAT liability.

VAT is currently levied at a rate of 7% on gross receipts, although a zero rate applies to exported goods and services that are used abroad. Certain businesses are exempt from VAT.

Specific Business Tax (SBT)

Some businesses that are not subject to VAT are instead subject to SBT, although certain entities and activities may be exempt from SBT. The tax is imposed on gross revenue, and the tax rate differs based on the nature of the business conducted:

Business	Tax Base	Business
1. Banking, finance, and similar businesses	Interest, discounts, service fees, other fees, profits from the exchange of foreign currencies	3%
2. Life insurance	Interest, service fees, and other fees	2.5%
3. Pawn brokerage	Interest, fees, remuneration from selling property which has not been bought back	2.5%
4. Real estate	Gross receipts	3%
5. Factoring	Interest, discounts, service fees, and other fees	3%

Note: Local tax at the rate of 10% is imposed on top of SBT.

Petroleum income tax

Income derived from petroleum operations is subject to the Petroleum Income Tax Act. Petroleum companies are taxed at the rate of 50% on the annual net profit from operations, including other activities incidental to petroleum operations.

Stamp duty

Stamp duty is payable on most documents filed by companies with government agencies or entities, and on official company documents. This includes transfers of land, leases, stock transfers, debentures, mortgages, life assurance policies, annuities, powers of attorney, promissory notes, letters of credit, and cheques.

Instruments, not transactions or persons, are subject to stamp duty. For stamp duty purposes, an instrument is defined as any document chargeable with duty under the Revenue Code. The stamp duty rules are contained in Chapter VI of Title II of the Revenue Code.

Only instruments listed in the stamp duty schedule are subject to stamp duty, and the persons liable to pay stamp duty are those associated with the instrument. For example, the persons executing the instrument, the holders of the instrument, or the beneficiary. General exemptions are available under the Revenue Code. Rates vary according to the class of the instrument. Failure to pay stamp duty can result in a penalty or tax surcharge.

Focus on
Sales, VAT, and other taxes

Excise tax

Excise tax is levied on certain types of products, such as alcoholic beverages, tobacco, and fruit juice.

Customs duty

Tariff duties on goods are levied on an ad valorem (according to value) or a specific rate basis. The majority of goods imported by businesses are subject to rates ranging from 5% to 60%. The majority of imported articles are subject to two different taxes:

1. Tariff duty, calculated by multiplying the Cost, Insurance and Freight value (CIF value) of the goods by the duty rate. The duty determined is then added to the CIF value of the goods.
2. VAT is then levied on the total sum of the CIF value, duty, and excise tax, if any.

Goods imported for re-export are generally exempt from import duty and VAT. Export duties are imposed on only a few items, including rice, hides, skins and leather, scrap iron or steel, rubber, teak and other kinds of wood.

Two exceptions to mandatory customs duties apply to the importation of machinery, equipment, and materials for use by:

1. Oil and gas concessionaires and their contractors; and
2. Certain companies receiving investment incentives from the BOI.

Capital gains tax

There is no capital gains tax in Thailand. Capital gains are treated as ordinary income for the purpose of calculating income tax.

Branch profits tax

There is no branch profits tax in Thailand. Thai branches of foreign companies will generally only be taxed in Thailand on the net profit arising from business conducted in Thailand. Thai branches are subject to the same tax rate as resident companies. However, a separate profit remittance tax is imposed on profits that are remitted outside of Thailand.

Signboard tax

This tax may be imposed at various rates per square metre (depending on the language) on any signs or billboards that display a name, trademark, or product for the purpose of advertising or providing information about a business.

Property tax

Owners of land and buildings in designated areas may be subject to either local development tax (based on the unimproved capital value of land), or house and land tax (calculated as a percentage of actual or imputed annual rental value). Local development tax is based on the appraised value of land, as determined by the local authorities. Land that is subject to house and land tax is not subject to local development tax. House and land tax covers all properties, with the exception of owner-occupied residences. The annual value is the official assessment of rental income that could be derived from such premises.

Focus on
Sales, VAT, and other taxes

New land and building tax

On 16 November 2018, the National Legislative Assembly (NLA) passed a long-delayed bill on new land and building tax, which will replace the house and land tax and the local development tax, and which will come into effect on 1 January 2020, The new property tax rates are based the appraisal value of the property and the category of the property, as follows.

Category of property	Statutory ceiling rate (As a percentage)	Appraisal value (Unit: millions of Thai baht)	Applicable rate (As a percentage)
1. Agricultural use	0.15	0 – 75 > 75 - 100 > 100 - 500 > 500 – 1,000 > 1000	0.01 0.03 0.05 0.07 0.1
Note: There is a tax exemption for agricultural land worth up to THB 50 million belonging to individuals, and the new law will not be applicable to individual owners for the first three years.			
2. Residence	0.3	0 – 50 > 50 - 75 > 75 - 100 > 100	0.02 0.03 0.05 0.1
Note: For first homes, there is a tax exemption of up to THB 50 million for owners of both the land and home, and whose names are on household registration documents, and up to THB 10 million for those who own homes only and whose names are on household registration documents.			
3. Commercial use	1.2	0 – 50 > 50 - 200 > 200 - 1,000 > 1,000 - 5,000 > 5,000	0.3 0.4 0.5 0.6 0.7
4. Undeveloped land	3	0 – 50 > 50 - 200 > 200 - 1,000 > 1,000 - 5,000 > 5,000	0.3 0.4 0.5 0.6 0.7
Note: Rates will be raised by 0.3% every three years, but will not exceed 3%.			

Focus on
Sales, VAT, and other taxes

Inheritance tax

On 1 February 2016, the Inheritance Tax Act came into effect in Thailand. The act does not apply to an inheritance where the owner dies before the date that the act is effective, or to an inheritance received by the spouse of the owner.

The following recipients of an inheritance will be liable to pay the tax:

1. A person who has Thai nationality – This includes: (1) a legal entity organised under Thai law; (2) a foreign legal entity in which shareholders of Thai nationality hold more than 50% of the share capital at the time that the legal entity has the right to receive an inheritance; and (3) a foreign legal entity where more than 50% of those who have managing power have Thai nationality. This applies regardless of where the property making up the inheritance is situated.
2. A person who does not have Thai nationality, but who has permanent residence in Thailand under the immigration law, regardless of where the property making up the inheritance is situated.
3. A person or international organization to which Thailand has an obligation under the United Nations or under international law, or in accordance with a treaty or agreement between Thailand and another country.

The following persons are exempt from the tax:

1. A person who receives an inheritance from the owner of the inheritance, where the owner has expressed his intention that the inheritance is to be used for the purposes of religion or education, or in the public interest.
2. A legal entity and governmental organization for religious, educational, or public purposes.
3. A person or international organization to which Thailand has an obligation under the United Nations or under international law, or in accordance with a treaty or agreement between Thailand and another country.

The following assets, received as an inheritance, are subject to the tax:

1. immovable property;
2. securities under the law governing securities and the securities market;
3. money that has been deposited, or other forms of money, where the owner of the inheritance has the right to withdraw it or claim it from the financial institution or person who accepted the deposit;
4. a registered vehicle; and
5. other assets as specified by a Royal Decree.

If the inheritance received has a value exceeding THB 100 million, no matter where received, or if received all at once or over a period of time, only that portion which exceeds the value of THB 100 million shall be taxed. For the purposes of this inheritance tax, the value of the inheritance subject to tax means the value of the asset received as an inheritance offset by the liabilities inherited.

The tax rate is 10% of the value of the inheritance subject to tax. However, if the recipient is a descendant or ancestor of the owner of the inheritance, the rate is reduced to 5%.

Gift tax

A new regulation on gift tax, as part of personal income tax, was announced on 5 August 2015, and became effective from 1 February 2016 onwards.

The following items will be assessable for personal income tax purposes:

1. Immovable property or rights of occupation of immovable property given to a legitimate son or daughter (but not including an adopted child) without compensation, the value of which exceeds THB 20 million in that calendar year;
2. Gifts (such as cash, shares, and other property), except for the following:
    - gifts received from an ancestor, a descendant, or spouse, the value of which does not exceed THB 20 million in that calendar year;
    - gifts received under moral obligation or gifts received in a ceremony or on occasions in accordance with established custom from a person who is not an ancestor, descendant, or spouse, the value of which does not exceed THB 10 million in that calendar year; and
    - gifts received for religious, educational, and public expenditure.

A taxpayer can choose to pay tax of 5% of the taxable portion without having to include the amount in the calculation of net taxable income for the year-end.

Focus on

Portfolio investment for foreigners

Focus on

Portfolio investment for foreigners

Stock Exchange of Thailand

A foreign individual that invests in securities listed on the Stock Exchange of Thailand (SET) is exempt from any tax on the capital gain made from the sale of shares. A foreign corporation will be subject to a 15% withholding tax on the capital gain under Thai law. However, this tax rate may be reduced or the gain may be exempt from tax under a DTA. Dividends received on shares are subject to a domestic withholding tax rate of 10%.

Thai real estate

Foreign investment in Thai real estate is restricted under the Alien Business Act 1999. However, the Land Code 1954 allows foreigners, under certain rules and conditions set out under the Department of Land's regulations, to have a proprietary right in immovable property.

Thus, a foreigner, with limited exceptions, cannot own land, but can own a building on land. Many foreigners therefore choose to obtain long-term leases. Depending on a quota based on total area size, a foreigner can own a condominium outright (for example, through freehold purchase) because the underlying land is owned by a Thai legal entity.

Focus on **Trusts**

Focus on **Trusts**

The concept of trusts and taxing trust income, which is prevalent in many western countries, does not exist in Thailand. There is no separate tax return that needs to be filed for trusts, and thus there is no separate taxation for trust income, either for the trustee or the beneficiary. Recently, however, trusts have been recognized purely for conducting transactions on the Stock Exchange of Thailand. In order to ensure that the trustee is not taxed on income derived, an exemption has been specifically granted to that type of investment income.

Focus on
Practical information

Focus on
Practical information

Transport

Bus transport dominates for long distances and in Bangkok, with motorbikes and bicycles dominating in rural areas. Road transportation is the primary form of freight transport. Standard rail travel has been used for many decades for rural long-distance transportation, though plans are underway to expand services with high-speed rail lines extending to several major regions of Thailand. There has also been a significant rise in domestic air transport.

Language

Thai is the national language. English is the next most commonly spoken language, and is especially prevalent among the business community in Bangkok. Many Thai-Chinese also speak Standard Chinese or a form of Mandarin Chinese.

Time relative to Greenwich Mean Time (GMT)

Thailand is seven hours ahead of GMT year round, as it does not observe Daylight Savings Time.

Business hours

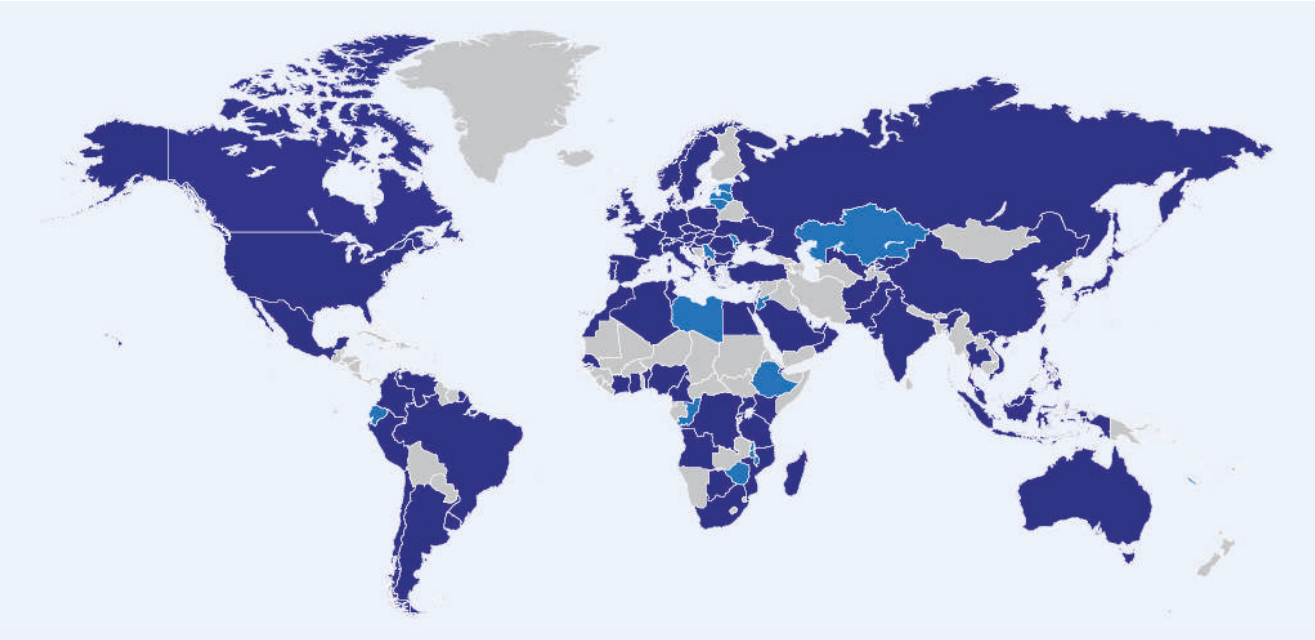
Businesses in Thailand generally observe an eight-hour day – from 8 a.m. to 5 p.m. A one-hour lunch period is usually taken between noon and 1 p.m. Most business offices are closed on Saturdays and Sundays.

Public holidays

The holidays observed by most businesses and government offices are:

- New Year's Day – 1 January (or the nearest weekday)
- Makha Bucha Day* – around the third week of February
- Chakri Memorial Day – 6 April
- Songkran – 13 to 15 April
- Labour Day – 1 May
- Coronation Day - 4 May
- Visakha Bucha Day* – around the third week of May
- HM the Queen's Birthday – 3 June
- Asarnha Bucha Day* – around the third week of July
- H.M. the King's Birthday (King Vajiralongkorn) – 28 July
- HM the Queen Mother's Birthday and National Mother's Day – 12 August
- Bhumilbol Memorial Day – 13 October
- Chulalongkorn Memorial Day – 23 October
- Father's Day and National Father's Day – 5 December
- Constitution Day – 10 December
- New Year's Eve Day – 31 December

*Dates are dependent on the Thai lunar calendar.



Valid as of 1 January 2020
*FTE at 31 August 2019

Integrated countries and territories

Non-integrated countries and territories:
Mazars correspondents and representative offices

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Mazars is an internationally integrated partnership, specialising in audit, accountancy, advisory, tax and legal services*. Operating in over 90 countries and territories around the world, we draw on the expertise of more than 42,000 professionals – 26,000+ in Mazars' integrated partnership and 16,000+ via the Mazars North America Alliance – to assist clients of all sizes at every stage in their development.

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