

# **Tax**Mazars in Thailand

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## 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 specializing 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



## Who we are

## **Mazars in Thailand**

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 currently has over 280 professionals. One of the main advantages we offer our clients is the multinational composition of staff. Our practice has Thai, British, Dutch, German, Indian, Japanese, Korean and Australian 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.

Global integrated partnership

13 € 11M
Partners Fee income

280 8 8
Staff Nationalities Languages

## Who we are

## Our tax team

Today's tax systems pose significant challenges for businesses. The complexities of domestic and international rules mean organizations need clear, informed, and considered guidance. Working closely with you as tax advisors in Thailand, we build transparent, integrated tax-efficient solutions that give you confidence, and help you excel in a sustainable way.

We work closely with you to provide tax solutions that help you achieve your strategic objectives. By acting as one agile, integrated, and collaborative team, across sectors, services, and geographies, our clients benefit from both our local roots and the global perspective that comes from being part of an international firm.

Mazars' advisory team supports clients with all aspects of personal and corporate income tax in Thailand, as well as international tax. As international consultants, we understand the complexities of working in a global economy.

In today's dynamic business environment, tax compliance and planning are areas that are sometimes neglected. Mazars advocates taking the initiative in planning and disciplined housekeeping by resolving any lingering tax issues. We can help with both. We can also assist you if you face a tax audit or tax investigation in Thailand.

"Our advisory team has assisted a multitude of clients and institutions, both in Thailand and abroad. The combination of our integrated international structure and experienced teams ensures that clients receive clear, concise, and practical tax consultant services in Thailand."



Jonathan Stuart-Smith Tax Partner



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## International tax

Providing clarity in the tangled world of global taxation. As an international firm with experts over 90 countries, we understand the tax implications of working in a global economy.

## Our approach

Companies that operate across borders or have a presence in multiple jurisdictions know that complying with local tax laws, and meeting reporting requirements, is a resource-intensive task. It demands local market expertise from trained professionals.

Our global network is ideally suited to serve large multinationals and global-minded mid-sized companies who need on-the-ground expertise in multiple jurisdictions. However, we also have substantial expertise helping fast-growing companies who need a tax-efficient structure for their first international expansion. The network means we have a clear view, not only of the global trend, but an on-the-ground view of disruptive, single-country initiatives, such as national taxes on digital services.

We have a particular focus on corporate structures. Whether it's the effects of Brexit, US tax reform, or changes triggered by the OECD Base Erosion and Profit Shifting (BEPS) action plan, the risk of a tax nexus is a growing and constant concern for businesses. We can also help with issues such as international tax transparency. Navigating such an ever-evolving business environment increasingly requires an integrated, global approach with access to coordinated advice that can support your strategy and business decisions for the long term.

#### **Our services**

- International tax advisory with our global tax expertise
- Providing expatriate tax services
- Structuring cross-border real estate transactions
- Supporting transfer-pricing policies and international financing operations
- Advising on cross-border mergers and acquisitions
- Determining the most tax-efficient way to structure foreign offices
- Structuring the funding of an overseas business, taking into consideration the tax laws of the respective countries
- Managing the effective rate of tax and assisting with the timing of transactions



## Global mobility & employment tax

Changes to the way we work are happening faster than ever before. Businesses need to keep up to survive. A new model is emerging, where staff with critical skills may be based anywhere in the world. This mobility increases the challenge of managing fast-changing government requirements in areas such as tax, social security, and immigration law. Our experienced team has global reach and can ensure both employer and employee remain compliant.

## Our approach

In an increasingly globalized world, companies need to have access to the right people at the right time, wherever they are in the world. These days, having a global footprint can often mean moving the task to the worker rather than moving the worker to the task. This flexibility is key to success, but achieving it means overcoming the complexity of managing teams in multiple locations.

We know there are many reasons companies use cross-border resources. Understanding what is behind these decisions helps us tailor our support to achieve the best results possible. We aim to build long-lasting relationships with our clients, and therefore place high value on the quality and practicality of our advice, as well as on transparency and fairness in all our client interactions.

Our global mobility specialists provide access to a worldwide network of experts in areas including tax and social security, employment law, immigration, risk assessment, global payroll management, and HR policy.

#### **Our services**

- Advising on cross-border employment arrangements.
- Supporting clients with "remote worker" situations and planning.
- Social security optimization.
- Assisting clients to remain fully compliant with tax, social security, payroll and other in-country requirements.
- Managing immigration risk and supporting our clients with applications.
- Tracking and reporting short-term business visitors.
- Reviewing global mobility and tax equalization strategy and policy.
- Mobility cost projection.
- Global payroll coordination and reporting.



## **VAT & indirect tax**

VAT and indirect taxes need careful planning, as they make up an ever-larger part of the tax take. Governments worldwide have shifted taxation to VAT and other indirect taxes over recent years to stabilize their tax base. VAT is a complex area which applies to various transactions, and which can have a direct impact on the bottom line, leading to significant penalties if one gets it wrong.

## Our approach

Mazars helps businesses plan for VAT before setting out on a new venture, including setting up overseas, buying or selling property, or raising finances. Our experienced team addresses compliance issues proactively to help clients avoid penalties, as well as the impact of transactions on other areas of the business, such as audit and direct tax.

International cooperation is particularly important in the field of VAT and indirect taxes. Therefore, besides your regular partner responsible for the mandate, your allocated VAT and/or indirect tax expert is available to answer all your questions concerning VAT and indirect taxes and is available as sparring partner where needed. We have deep national and international expertise from a team of tax consultants, specialist lawyers for tax law as well as auditors and management consultants.

#### **Our services**

Mazars' indirect tax experts can offer advice and support with the following issues across all sectors:

- Health checks that can identify both VAT risks and opportunities for VAT savings
- International tax and dealing with trading outside Thailand
- Land and property transactions and related tax options
- Expert advice for specific tax solutions
- Acquisitions and disposals
- Compliance with Thai tax authorities' requirements
- Compliance with tax returns and payments, penalties and surcharges, tax registration, reviews and tax audits
- Indirect tax investigations and independent tax reviews
- Managing the impact of an indirect tax investigation
- Negotiating with the Thai tax authorities
- Conducting appeals proceedings and dealing with finance court actions



## **Transfer pricing**

Organizations that span international borders are increasingly facing complex regulatory and tax issues in the different jurisdictions in which they operate. Transfer pricing is at the top of the tax priority list for many mid-sized and large businesses, with an outsized impact on business units. We offer a range of solutions for transfer-pricing management so you can ensure compliance with local regulations.

## Our approach

There is greater scrutiny of transfer pricing the world over. Only a global, multi-layered approach can bring simplicity to this fast-evolving issue. In order to help clients assess the risks adequately and utilize all possibilities for optimization, Mazars' experts consider not only the Thai regulations, but the transfer-pricing regulations in the other countries involved as well.

Our global partnership in more than 90 countries provides vital expertise in tracking developments, such as new legislation and court/tribunal rulings in each jurisdiction, through direct contact with our transfer-pricing experts who have deep industry know-how and the local and international expertise necessary.

Our service begins with a diagnostic risk assessment that seeks to highlight areas for savings, as well as exposure. We then work closely with you to make sure you can meet your documentation obligations and optimize your tax positions.

#### **Our services**

- TP reports and benchmarking studies
- TP policy implementation
- TP planning and structuring
- TP compliance and documentation
- Tax advisory services on specific TP issues
- Support with tax audits related to TP issues
- Justifying the transfer prices used to the tax authorities in the course of a tax audit



## M&A tax

M&A transactions are key moments in any company's progress, and also moments when years of tax planning can be undone, especially cross-border deals involving less developed countries. Many deals are done under time pressure, making immediate access to on-the-ground expertise vital.

## Our approach

When you are considering a merger or an acquisition, it is important to assess your tax obligations. You will want to make sure your transaction is as efficient as possible, both commercially and financially.

Tax is a vital part of our global, cross-disciplinary M&A service that brings in advisory, valuation, due diligence, and integration consulting. Our understanding of the full transaction lifecycle helps us deliver key tax advice at the speed needed to ensure opportunities are seized and best prices obtained.

Our network spans more than 90 countries and territories, including expert presence in countries such as Brazil, China, and India, where tax systems are undergoing significant change and transactions can be tripped up by tax issues such as transfer pricing and rules on controlled foreign companies.

We offer particular assistance to a wide range of corporate clients, both listed and privately-owned companies, for whom a major, cross-border M&A deal can be transformative, but which previously may have needed sophisticated tax planning.

#### **Our services**

We offer tax advice covering:

- Direct advice on transaction structure;
- Tax risk assessment;
- Strategic advice on tax for holding companies and other new corporate structures;
- Advice on tax-efficient deal finance;
- Advice on the tax-efficient return of funds to investors after a disposal;
- Advice on post-acquisition structuring.



## National & domestic tax

Amid an evolving landscape of tax policies and legislation, our team of tax and legal experts can ensure you remain compliant. Mazars' global team of tax experts works with companies and private clients operating in single or multiple jurisdictions to ensure compliance with tax legislation and the necessary reporting requirements.

## Our approach

Whether you are a small business owner or a large corporate entity, our extensive knowledge of local tax matters means we are perfectly placed to help you, wherever you are in the world.

Our team, based in jurisdictions across the world, has the technical expertise and specialist know-how to provide individual services and bespoke planning so you can effectively manage your tax. We offer advice on employment, corporate, personal, indirect, international and multi-jurisdiction tax issues, crafting solutions and dedicated teams around your needs.

Our corporate tax experts can help with annual tax returns, or in strengthening corporate compliance functions to ensure local tax risks are managed. We understand the increasing tax burden that companies and private clients face in today's world, and our expertise ensures you will always be up-to-date with the latest requirements and approaches.

At Mazars, we can also advise on implementing tax risk management processes and controls to ensure you are always confident of satisfying the requirements of domestic tax authorities and regulators.

#### **Our services**

Mazars provides specialist tax advice on various topics, such as:

- Corporate income tax;
- Personal income tax;
- Employment tax;
- VAT & indirect tax;
- Private client tax;
- Tax compliance.



## Tax compliance

Ensuring tax compliance is an increasingly heavy burden. Tax codes are getting more complex, and authorities are demanding increased reporting in their search for non-compliance. Yet precise compliance is vital, not only to prevent fines but also to avoid triggering audits and investigations.

## Our approach

Domestic businesses and multinational companies all face increasingly complex tax rules, greater scrutiny from tax authorities, and a greater obligation to ensure compliance with a complex web of laws. Our global network has the resources and local knowledge to handle the most obscure national compliance requirement efficiently.

We can offer particular assistance to fast-growing companies who are making their first international expansion, but which lack compliance and knowhow outside their home market.

Our internal expertise in areas such as connection to national tax gateways is also put at clients' disposal.

#### **Our services**

We can offer help across all aspects of tax compliance, including:

- VAT & indirect tax compliance;
- Corporate tax;
- Transfer pricing;
- Personal income tax;
- Support with tax authorities audit;
- Strategic compliance advice.



## Tax dispute resolution

Tax disputes are rising globally as governments focus on perceived underpayment. Cross-border taxation issues such as transfer payments, in particular, are creating a surge of disputes because new legislation creates grey areas and the need for test cases. This makes tax disputes a fact of life for firms with complex tax positions.

## Our approach

Businesses are facing an environment where audits from tax authorities are on the rise. As tax laws become more stringent and regulations more complex, companies have an incentive to avoid disputes whenever possible. We aim to prevent tax disputes at the source with robust, risk-based tax advice. We can also advise on recordkeeping and other processes to minimize the chances of proceedings.

When disputes occur, however, we offer consistent assistance throughout a difficult process which can take, in some cases, many years. We also provide strategic guidance on the risks and benefits of arbitration versus court proceedings and whether to accept settlement offers. We also advise on criminal action being taken against both companies and individuals.

Our dedicated local tax dispute teams in major jurisdictions have detailed procedural and administrative knowledge that can make an important difference to outcomes, with the ability to draw on global expertise in areas such as transfer pricing and customs duties.

We can also advise on issues such as alleged non-payment of minimum wages and executive remuneration that have a labour law component.

#### **Our services**

We offer support covering:

- Risk-based consultancy to minimize the chance of disputes;
- Local specialists to help with national tax cases, from prevention to management and settlement;
- Extensive experience with transnational mechanisms;
- Advice on the risks/benefits of starting action against tax authorities;
- Advice on voluntary disclosures.



## Global tax credits & incentives

Tax credits and incentives can be a major driver of growth for businesses, supporting their innovation and R&D initiatives. They are available by city, state, province or nationally in most of the world's jurisdictions. Our global team can assist you in identifying these programmes, as well as other potential sources of financing. We can also help with submission of applications to tax and government authorities.

## Our approach

When it comes to investments and location selection, tax credits and incentives can often be a deciding factor. Governments around the world offer incentives to companies that elect to do business in their jurisdiction. Finding and securing such incentives often requires knowledgeable advice and technical guidance.

We have a global team that tracks the incentives offered by jurisdiction and industry, including those for innovation, research and development, and capital investment. Following a proactive approach, we work closely with our clients throughout their tax year to access assistance programs and process tax credit applications in real time.

Tax incentives have become particularly vital amid the uncertainty triggered by Covid-19, which has led governments worldwide to expand tax incentive programs to cushion the economic impact. Our Covid-19 Global Tax and Law Tracker, launched at the onset of the pandemic, includes credit and incentives from 75 countries worldwide.

Our dedicated team of tax, legal, and accounting professionals and engineers (industry specific) will guide you through the process of claiming available tax credits and incentives from the applicable governments and authorities. We advise on the incentives that are right for your business and its growth plans. Our national teams have extensive contacts with authorities in each of the jurisdictions in which we operate, as well as the expertise in compliance, reporting and local follow-up requirements needed to secure your benefits.

#### **Our services**

We can offer help across all aspects of tax compliance, including:

- Claim planning to maximize legitimate use of credits and incentives;
- Drafting applications, project descriptions, and financial data summaries to support claims;
- Follow-up with local authorities to ensure benefits materialize.

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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 44,000 professionals – 28,000+ in the Mazars integrated partnership and 16,000+ via the Mazars North America Alliance – to assist clients of all sizes at every stage in their development.

\*Where permitted under applicable country laws

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