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Clarification

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For the Leading the Way article on page B5 of Tuesday's Business section, PwC Thailand would like to clarify that besides Vietnam, Cambodia also has transfer pricing regulations among the new members of Asean. Although Cambodia has a provision (Article 18 of the Law on Taxation) allowing the tax authority to distribute revenue and allocate expenses among enterprises with common ownership (defined as "at least 20%") to prevent tax avoidance or evasion, it provides no details or guidance. The country is in the process of introducing transfer pricing guidelines.