



# Tax services





# Tax Services

## 1. Tax Compliance and reporting

### a. Tax compliance services

Working side by side with our clients, we help organisations redefine the way they manage their tax functions. Our aim is to enhance decision-making capabilities while effectively controlling risk and tax costs.

It's becoming increasingly challenging to ensure corporate income tax compliance in Cambodia as tax laws and interpretations evolve and become ever-more complex. The financial and reputational consequences of non-compliance can be significant.

Regardless of the nature or size of your organisation, our team of multi-industry specialists has local market insights and regulatory knowledge to help transform your tax function and compliance process into a strategic business asset. Our efficient and proven approach empowers companies to do more with fewer resources, allowing tax and finance professionals to focus more on business priorities and strategic initiatives

### Tax return reviews and preparation

We understand there's pressure to comply with the laws, but you don't want to pay more than you need to. We can help you navigate these complexities efficiently by:

- obtaining reasonable assurance that you've complied with the tax laws and regulations on a monthly and annual basis
- reducing your potential tax exposures and make sure you understand your current tax status
- making sure your tax returns don't contain any inappropriate treatment/information
- identifying any major exceptions in your tax compliance, and
- tax consulting advice on contentious or unclear matters and/or retainer arrangements to support your team and provide comfort and insight on tax matters on a day-to-day basis.



# Tax Services

## 1. Tax Compliance and reporting

### b. Taxation compliance review

We understand that you don't want any surprises. So, we offer a tax health check to identify potential areas of non-compliance, mitigate risks and enhance overall tax efficiency.

Our tax compliance professionals will assess your tax compliance in all aspects of taxation including tax on income, tax on salary, value-added tax, withholding tax, specific tax, accommodation tax, public lighting tax, stamp duty, property tax, and customs and excise tax.

We'll perform a high-level, issues-driven review, focusing on key risk areas, so that we can identify any problem areas and potential planning opportunities.



# Tax Services

## 2. Tax accounting services (TAS)

Keeping track of tax law changes around the world is virtually impossible, especially when you have a business to run. Companies now face an increased strain on their tax accounting and reporting professionals. Our tax accounting specialists can provide you guidance, and best practices, on a range of tax accounting issues tailored to your situation. We provide:

- tax provision support
- tax accounting consultation, including deferred tax analyses
- advice regarding accounting for uncertain tax positions
- tax accounting technical assistance and support, including customised training.



# Tax Services

## 3. Tax structuring

We have a range of solutions designed to help you reduce your direct and indirect tax costs using efficient structuring techniques and trading arrangements. We can help you with:

- international tax planning
- tax-efficient group reorganisation
- value chain transformation
- group tax-planning programmes, and
- finance and treasury.

Our integrated offerings mean we can also help you to:

- align your tax/fiscal and operational models
- make sustainable structural tax improvements and increase shareholder value and cash flow
- achieve a rationalised manufacturing capacity and optimise your physical distribution network
- make your supply chain and operating structure more efficient
- align profits with restructured business processes, and
- create flexibility so that you can adapt to future business changes.



# Tax Services

## 4. Tax dispute resolution

Today's tax controversy landscape represents a perfect storm of competing factors. In Cambodia's self-assessment system, tax audits by the General Department of Taxation have become the norm rather than the exception. We can work with you to:

- prevent tax disputes with tax officers and identify tax risks and exposures arising from tax compliance
- manage the tax audit process
- resolve tax disputes with the tax authority
- exploring alternatives for tax dispute resolution and advocating for successful dispute resolution by:
  - assisting with the tax appeal and litigation processes
  - assisting with mutual agreement proceedings.



# Tax Services

## 5. Tax mergers and acquisitions (M&A)

Our tax M&A professionals assist businesses with their acquisitions, disposals and restructuring, mergers and amalgamations, tax deal structuring, due diligence, post-transaction integration, contract negotiation and documentation.

Our specific services include:

**a.**

### Tax due diligence

We provide tax buy-side and sell-side due diligence for clients. Our due diligence team carries out its review on a systematic basis and focuses on quantifying tax risks and opportunities. Our sell-side due diligence allows clients to manage risk and better position the company's assets to be sold.

**b.**

### Deal structuring

We provide structuring advice at the pre-acquisition, deal execution and post-deal integration stages. Our pre-acquisition and deal execution advice focuses on reducing the group tax rate going forward, as well as identifying and executing required pre-transaction reorganisations. Our post-deal integration services allow us to work with our clients to prioritise a work plan for post-transaction work streams that deliver tax value from the transaction.

**c.**

### Support services

In addition to our tax M&A services, we offer complementary support services that address the legal and human resources matters that arise during the M&A process.



# Tax Services

## 6. Transfer pricing services

Transfer pricing continues to be a burning issue on multiple, converging fronts. Globalisation and the continued complexities around international trade have made inter-company pricing an general necessity for many businesses. Meanwhile, changing regulations, audits, enforcement – and much steeper penalties – continue to present significant challenges.

With PwC's global transfer pricing network, we are well positioned to advise you on a strategy that will help advance your goals despite the frequent changes to compliance requirements. We have the tools, the local presence and sophisticated regulatory knowledge that will help you stay ahead of the game.



## Our services



Transfer pricing advice



Transfer price setting



Transfer pricing risk assessment



Transfer pricing compliance review and documentation



Transfer pricing benchmarking



Transfer pricing dispute resolution

# Business process outsourcing services

PwC offers a broad range of outsourcing services designed to help organisations manage their non-core functions more efficiently and effectively. Our expertise and resources help our clients to achieve their strategic objectives while ensuring compliance and operational excellence. Here's an overview of PwC's outsourcing services:

## Bookkeeping services

As your business grows, accurate and timely bookkeeping becomes crucial. Inconsistent financial records with errors can hinder your company's progress as reliable financial information provides a strong foundation for growth and success.

At PwC Cambodia, we provide precise bookkeeping services that allow you to focus on your business. Our services include:

- automating essential bookkeeping tasks (day-to-day bookkeeping, maintenance of financial records, and transaction processing) and enhancing business processes, and
- providing insightful financial data reports to drive productivity in tax, accounting and management functions.

Let us handle your bookkeeping needs so you can concentrate on achieving your business goals.

## Statutory financial statements preparation

Our experienced professionals specialise in financial statement preparation and are well-versed in current regulations and standards. We can help you with:

- drafting detailed notes and disclosures as required by regulatory bodies, and
- filing your statements on time so you meet the statutory filing and reporting obligations as required by the Accounting and Auditing Regulator of Cambodia (ACAR).



# Business process outsourcing services

## Audit support

Accounting audits are a requirement by the accounting and auditing regulator in Cambodia. We're here to support you through every step of the audit process. We can assist you with:

- preparing and submitting documents and records for internal or external audits.
- audit queries and requirements.

## Payroll and HR services

Many finance departments grapple with complex compliance and reporting requirements, data manipulation, and manual processes that create risk. Adding to these challenges are limited resources, data security concerns, and a need to focus on core business matters.

Our team can support you with managing processes, people, and technology to help you redesign, redefine, and redeploy your payroll function. If you lack in-house payroll expertise or resources, are struggling with lengthy, repetitive, and error-prone processes, or have concerns about regulatory compliance and data protection, get in touch with our team today. Our services include:

- handling payroll tax calculations, filings, and compliance with the labour law and social security fund contributions.
- assisting with registration and applying for work permits and quotas.



# Company Secretarial Support Services

**Understanding Cambodian laws and adhering to the regulations can be confusing and time-consuming. This makes it essential to seek support from professionals who specialise in the field. We've been assisting companies for nearly three decades to meet their legal obligations in Cambodia. Our goal when working with you is to provide you with peace of mind by ensuring you comply with the law and minimise any legal risks. With our experience and expertise, we can help you with the following:**

1



## Company incorporation

To ensure an entity is established correctly and meets the needs of the intended business structure, we conduct a comprehensive pre-establishment analysis. Where necessary, this process is supported by our restructuring and tax experts, ensuring that our clients don't encounter unforeseen issues or expenses in the future. Our team of dedicated entity formation specialists provides an end-to-end service, supporting you throughout and creating a seamless experience for market entry into Cambodia.

2



## Corporate changes

We provide direct support for a variety of corporate transactional services, tailored to each business' unique requirements, including:

- ad-hoc corporate changes – such as director changes, company name changes, registered address changes, amendments to constitutional documents, share transfers
- ancillary legal support – including corporate structuring projects, corporate simplification projects, redomiciliation and drafting Powers of Attorney

3



## Dissolutions

Ensuring the proper closure of your company with the authorities is as important as maintaining your business during its operational phase. Our team offers continuous support with closing all entity types in Cambodia, ensuring the dissolution of a business is handled diligently and effectively, so you can focus on your ongoing business operations without any distractions.

**Talk to us about  
how we can  
help you**



**Heng Thy**  
Partner  
Tel: +855 (0) 23 860 606  
heng.thy@pwc.com



**Pov Ratha**  
Partner  
Tel: +855 (0) 23 860 606  
pov.ratha@pwc.com



# Thank you