Asia Pacific VAT/GST Alert

InTouch

with indirect tax news

Issue 04/14

pwc

Welcome to issue 04/14 of InTouch* which covers developments in VAT/GST in Asia Pacific during the period October 2014 to December 2014.

Please feel free to reach out to any of the PwC contacts on the back of this issue.

Australia

GST Rulings

- GSTR 2014/1: This ruling explains the Commissioner's views on the GST consequences of incentive payments made by motor vehicle manufacturers, importers and motor vehicle dealers. The ruling provides practical guidance to the motor vehicle industry following the decision of the Full Federal Court in AP Group Limited v Commissioner of Taxation [2013] FCAFC 105.

- GSTR 2014/2: This ruling explains the Commissioner's view on the GST treatment of ATM service fees, credit card surcharges and debit card surcharges.

- GSTR 2014/3: This ruling explains the Commissioner's view that a transfer of bitcoin from one entity to another is a "supply" for GST purposes. The exclusion of supplies of money from the definition of the term "supply" does not apply to bitcoins, because a bitcoin is not "money" as defined in the GST Act.

- GSTD 2014/D4: This ruling sets out the Commissioner's preliminary view that the supply of brokerage services that facilitate the sale or purchase of financial products on overseas securities or futures exchanges are GST-free, as they are a supply made in relation to rights that are for use outside Australia. This is a belated clarification of the Commissioner's view of the GST-free treatment of "rights" following the High Court decision in Travelex Ltd v Commissioner of Taxation [2010]HCA 33.

- GSTR 2014/D4: This ruling sets out the Commissioner's preliminary views on the meaning of the terms "passed on" and "reimburse" for the purposes of the new refund rules in Division 142 of the GST Act.

- GSTR 2014/D5: This ruling sets out the Commissioner's preliminary view on the GST treatment of particular transactions in development lease arrangements between government agencies and private property developers.

GST Cases Update

- The High Court has refused the taxpayer's application for special leave to appeal against the decision of the Full Federal Court in ATS Pacific Pty Ltd v Commissioner of Taxation [2014] FCAFC 33. The Full Federal Court found that the supplies made by the taxpayer, an Australian resident inbound tour operator, to non-resident travel agents were taxable (and not GST-free).

- On 3 December 2014, the High Court handed down its decision in Commissioner of Taxation v MBI Properties Pty Ltd [2014] HCA 49 and unanimously reversed the decision of the Full Federal Court. The High Court decided that the taxpayer (MBI) was required to make an increasing adjustment under Division 135 of the GST Act in relation to its GST-free acquisition of a going concern comprising three residential apartments encumbered by lease agreements with the previous owner of the apartments. This decision also provides certainty on whether the new owner of a reversionary interest in real property is required to pay GST on the rent received for the lease of the property.

- The Commissioner of Taxation issued an amended Decision Impact Statement setting out his view of the impact of the decision of the High Court in MBI. This states that the High Court decision "is consistent with existing practice", and that there are no anticipated material changes to the Commissioner's existing rulings resulting from the decision.

For more information, please contact:
Peter Konidaris
peter.konidaris@au.pwc.com
+61 3 8603 1168

China

Adjustment of export VAT refund rates

China's Ministry of Finance ("MOF") and the State Administration of Taxation ("SAT") have jointly issued the Caishui Circular [2014] No.150 ("Circular 150") adjusting the export VAT refund rates of certain goods. By way of background, China prescribes the rate of refund of input VAT for certain goods that are exported out of China. The following changes were announced in the circular:

- With effect from 1 January 2015, the export VAT refund rates of certain high value-added products, processed corn products, textiles and articles of apparel and clothing will be increased. The increase for processed corn products will be implemented till 31 December 2015.
- With effect from 1 January 2015, the export VAT refund for boron steel will be abolished.
- With effect from 1 April 2015, the export VAT refund rates of certain articles of human hair and wigs will be reduced.

For more information, please contact:
Alan Wu
alan.wu@cn.pwc.com
+86 10 6533 2889

India

Delhi

- The requirement to file information relating to statutory forms online in Form CD-1 has been withdrawn.
- The facility of VAT exemption/refund has been granted to the Embassy of the Republic of Latvia in New Delhi.
- The State Bank of Bikaner and Jaipur located in the National Capital Territory of Delhi has been notified as "Appropriate Government Treasury" for the collection of tax, interest, penalty and any other amount due under the VAT/CST Act.

Haryana

- The VAT rate on diesel has been increased from 8.8% to 11.5%.

Uttar Pradesh

- The exemption from the deduction of tax at source to "a University or an Educational Institution or a Training Centre" has been withdrawn.
- The VAT rate on "shoe welts" has been reduced from 14% to 5%.
- The VAT rate on certain goods has been changed as follows:

Goods	Previous Rate	Revised Rate
Computer Parts	14%	5%
Aviation turbine fuel sold to a civil aircraft in Agra and Varanasi	14/21%	5%
Transformer and Transformer parts	14%	5%

- The turnover of the sale of Bio-fuel (i.e. Bio-diesel, Bio-Ethanol, Bio-Gas and Producer Gas) and machinery in the production of Bio-fuel in the State of Uttar Pradesh has been exempt from the levy of tax for a period of ten years commencing from 14 November 2014.

Tamil Nadu

- The VAT rate on certain goods has been changed as follows:

Goods	Previous Rate	Revised Rate
Cane, sugar, beet sugar, chemically pure sucrose in solid form	NIL	5%
Tobacco	20%	30%

Punjab

- The VAT rate on certain goods has been changed as follows:

Goods	Previous Rate	Revised Rate
Diesel (other than premium diesel)	9.75%	11.25%
Cold drinks (including aerated drinks, soda)	22.5%	27.5%
Cigarette (including cigar)	20.5%	30%

VAT Case Laws

- The Supreme Court, in State of Punjab and Ors. v Nokia India Pvt Ltd (TS-590-SC-2014-VAT), held that the mobile phone charger is an accessory to the mobile phone and subject to VAT at the residual rate as it is not a part of the mobile phone, even when supplied as a combo pack.

- The Kerala High Court, in Surya Constructions v State of Kerala (TS-552-HC-2014(KER)-VAT), held that no VAT was payable on the profit margin earned by a contractor where the entire contract had been sub-contracted to a third party sub-contractor. The High Court observed that in the absence of the sale of material by the contractor, no tax can be fastened on the contractor.

Notifications/Circulars for Service Tax

- The Central Board of Excise and Customs ("CBEC") has clarified that no service tax would be payable per se on the amount of foreign currency remitted to India from overseas by the foreign money transfer service operators (MTSO). However, the following services would be liable to tax:

  - Representation services or services rendered in the capacity of an agent by India bank/entity to MTSO; and

  - Services rendered by bank/agent/sub-agent to ultimate beneficiary or bank in India for which a separate consideration has been charged.

- The service tax rules (STR) have been amended to enable the officer or the audit party deputed by the Commissioner or the Comptroller and Auditor General of India, or a cost accountant or chartered accountant nominated under section 72A of the Finance Act, 1994 to conduct the audit/verification of records maintained by the person liable to pay service tax. This is to ensure compliance with service tax provisions.

Service Tax Case Laws

- The Supreme Court, in UOI v M/s Travelite (India) stayed the order passed by the High Court, which seeks to remove rule 5A(2) of the STR, 1994. The rule (which governs the powers to conduct an audit/verification of records maintained by the person liable to pay service tax) was removed as the said powers did not have the appropriate statutory backing.

- The Kerala High Court upheld the decision of the single member bench in Union of India and others v Kerala Bar Hotels Association and others (2014-TIOL-1913-HC-KERALA-ST). It was held that the levy of service tax on the sale of food and other articles for human consumption in restaurants and on consideration received for providing accommodation in hotels was ultra vires the Constitution of India.

- The High Court of Gujarat, in Sweta Sales Corporation v Union of India and 2 (2014-TIOL-2175-HC-AHM-ST) held that for the purpose of section 106(2) of the Finance Act, 2013 (the Service Tax Voluntary Compliance Encouragement Scheme, 2013 (STVCE)), the issuance of summons before 1 March 2013 for inquiry under section 14 of the Central Excise Act, 1944 (CEA) would result in initiation of proceedings under the Act. Hence, the benefits of the STVCE scheme would not be available to the appellant. This was irrespective of the fact that the summons were received after 1 March 2013.

- The Mumbai Tribunal, in Star India Pvt Ltd v CCE (2014-TIOL-1886-CESTAT-MUM) held that the services rendered to a foreign broadcaster by an Indian representative/ agency (comprising the soliciting of advertisements for their channels broadcast in India) would be liable to tax under the "broadcasting agency services" category. This is despite the fact that the advertisers were located outside India and invoices were raised by the foreign broadcaster directly on foreign advertisers, for which the consideration was also paid/received outside India.

- The Bangalore Tribunal, in Saipem (Portugal) Comercio Maritimo v CCESTC (2014-TIOL-1892-CESTAT-BANG), held that activities of drilling, testing, casing, coring, and completion of exploratory and development of oil and gas wells in specific locations identified by the recipient of services would not be taxable under "survey and exploration of mineral, oil and gas services".

- In Microsoft Corporation (I) (P) Ltd v CST (2014-TIOL-1964-CESTAT-DEL), the Delhi Tribunal held that the business auxiliary services in the nature of technical support rendered by the Indian subsidiary for the foreign holding company, including marketing of products in India, qualified as an export of services as per the former provisions of the Export of Services Rules, 2005 and would not be liable to tax.

- The Mumbai Tribunal, in Hindustan Petroleum Corporation Ltd v CCE (2014-TIOL-2070-CESTAT-MUM) held that overriding commission paid for promotion/marketing of goods produced by the manufacturers by making available the marketing/distributor network, and by adding brand value to the products, was liable to service tax under the service category of "business auxiliary services".

- The Mumbai Tribunal held in Blue Star Ltd v CST (2014–TIOL-2257-CESTAT-MUM), that the services of procuring purchase orders for foreign clients and maintenance services in relation to equipment provided to Indian buyers on behalf of foreign clients during the warranty period, were covered under the category of "business auxiliary services" and qualified as export of services under rule 3(3)(i) of the former Export of Services Rules. Accordingly, the service provider was held to be entitled to a refund of CENVAT credit.

- The Mumbai Tribunal, in CCE v Meadwestvaco India Pvt Ltd (2014- TIOL-2359-CESTAT-MUM), held that the relevant date for calculation of limitation period in respect of filing refund claims relating to service tax was the date of payment of service tax.

- The Mumbai Tribunal, in Zim Laboratories Ltd v CCE (2014-TIOL-2436-CESTAT-MUM), held that where the appellant had paid a sum towards the demanded tax which was appropriated in the impugned order, the same would fulfil the condition of mandatory pre-deposit of 7.5% under section 35F of the Central Excise Act 1944, and no further pre-deposit was warranted.

For more information, please contact:
Vivek Mishra
vivek.mishra@in.pwc.com
+91 124 330 6518

Anita Rastogi
anita.rastogi@in.pwc.com
+91 124 330 6531

Indonesia

VAT-exempt low budget houses

The Ministry of Finance has clarified the new criteria on VAT-exempted low budget housing. The new criteria includes the following:

- The width of the building is not more than 36 m2; and
- The sale price does not exceed the price threshold based on various zones and relevant year (e.g. Rp 120 million for Jakarta for 2014 to 2018).

VAT implications on agricultural products

The Indonesian Tax Office has issued a regulation (SE-24) which stipulates the tax implications of agricultural products as follows:

- Agricultural products which are specifically mentioned in the VAT Law and/or Government Regulations (GR31) as VAT-exempted are still treated as VAT-exempted (i.e. fresh fruits, vegetables, rice, grain, corn, sago and soybeans).
- Plantation products, ornamental plants, herbal plants, food-crop and forestry products which are listed in GR-31 are now subject to VAT (previously VAT-exempted). Entrepreneurs must collect VAT on deliveries of these products and registered as VAT-able Entrepreneur (PKP) if the turnover exceeds Rp 4.8 billion per annum.

However, when determining the VAT treatment of a product, the PKP should not only look at the type of plants, because the same type of product may have a different VAT treatment. Therefore, they should also analyse the following:

- Consumption purpose of the delivered products. For example, coffee beans processed from coffee fruits are goods subject to VAT. However, they become VAT-exempted if consumed as animal feed.
- Specific parts of the products that are delivered. For example, corn kernel is a good not subject to VAT. However, other parts of the corn (e.g. ear of corn, corncob and cornhusk) that have been separated from the kernel and are further processed and delivered in other forms, are goods subject to VAT.

For more information, please contact:
Ali Widodo
ali.widodo@id.pwc.com
+62 21 52890623

Abdullah Azis
abdullah.azis@id.pwc.com
+62 21 52890601

Japan

Introduction of Japanese Consumption Tax ("JCT") on cross-border digital services

As part of the 2015 Tax Reform, the ruling Liberal Democratic Party and New Komeito coalition recently confirmed plans to subject electronic supplies by offshore suppliers to JCT with effect from 1 October 2015. The measure is expected to pass through the Diet around the end of March 2015.

2015 Tax Reform Outline

The details of the 2015 Ruling Party's Tax Reform Outline were publicly announced on 30 December 2014.

- Change of the in-or-out-of-scope criteria (from origin principle to destination principle)

  The provision of digital online services performed via telecommunications, such as the distribution of e-books, music or advertisements, is defined as the "Provision of Telecommunication Services", and the in-or-out-of-scope criteria is changed to the destination place of the person who receives the services, instead of the origin place of the service supplying office.

- Introduction of reverse charge mechanism for Provision of B2B Telecommunications Services

  The "Provision of Telecommunication Services" supplied by an Offshore Business Person in which it is clear in view of the nature of such services or the terms and conditions, etc. of such services that the recipient of such services is a business person, is defined as the "Provision of B2B Telecommunication Services". In this case, the consumption tax liability of the transaction is shifted to the business person who receives the provision of services (i.e. the introduction of a reverse charge mechanism).

  With the reverse charge mechanism in place, specific purchases among taxable purchases in Japan (hereinafter referred to as "Specific Taxable Purchase") is included in the scope of consumption tax liability.

  An Offshore Business Person engaged in the Provision of B2B Telecommunications Services in Japan is required to notify the counterparty prior to the provision of such services, that a business person completing a Specific Taxable Purchase of such services becomes a consumption taxpayer.

- Transitional measure to ensure fair taxation

  For the time being, the input tax credit on a taxable purchase for receiving the Provision of B2C (Business to Consumer) Telecommunication Services from an Offshore Business Person is not allowed even though it was actually provided to a business person. However, the input tax credit on a taxable purchase for receiving the Provision of B2C Telecommunication Services from a "Registered Offshore Business Person" is allowed if the incoming invoice or the like describing the registration number, etc. of such Registered Offshore Business Person is retained under certain conditions.

For more information, please contact:
Masanori Kato
masanori.kato@jp.pwc.com
+81 3 5251 2536

Kotaku Kimu
kotaku.kimu@jp.pwc.com
+81 3 5251 2713

Malaysia

Regulations on the mechanism to determine unreasonably high profit

The Price Control and Anti-Profiteering Act 2011 ("the Act") makes it an offence for any person who "profiteers" in the course of his trade or business. Profiteering is defined in the Act as making unreasonably high profits. The regulations on the mechanism to determine unreasonably high profit have just been gazetted. The Act and regulations are applicable to businesses regardless of its GST registration status. Reliance is placed on the Act and the regulations to ensure that businesses do not profit from the implementation of GST in Malaysia.

The regulations prescribe that profit is unreasonably high for the period 2 January 2015 to 30 June 2016 if is there is an increment in the net profit (in Ringgit Malaysia) of any goods or services as compared to the net profit of the same description of goods or services as at 1 January 2015. However, the profit will not be regarded as unreasonably high during the abovementioned period if the increment in net profit is due to the reduction of costs and there is no increase in the selling price of the goods or services.

The regulations also provide details on how the net profit on 1 January 2015 should be calculated if the goods or services are:

- On cheap sale/promotion; or
- New (i.e. not previously available in the market).

Accounting for GST on imported services

The time of supply for imported services is treated to have been triggered when the supplies are paid for. However, the Royal Malaysian Customs Department ("RMCD") has allowed for output tax to be accounted for based on the date of the invoice if the invoice is issued earlier than the date of payment. Further, the value for imported services will be regarded as GST exclusive.

For more information, please contact:
Wan Heng Choon
heng.choon.wan@my.pwc.com
+60 3 2173 1488

New Zealand

GST and online shopping

In the recently released Briefing for the Incoming Minister of Revenue, the Inland Revenue identified overseas purchases of goods and services entering New Zealand GST free as a growing issue. The Briefing noted that this is of particular concern for New Zealand because of the importance of the GST base.

This issue has been highlighted by Inland Revenue with digital imports (e.g. purchases of online music) as the biggest concern.

Inland Revenue is clear that goods and services that are consumed by New Zealanders should be subject to GST. However, it also recognises that there are inherent enforcement difficulties in imposing GST on offshore online purchases. In Inland Revenue's view, the most productive way forward is to work with the OECD and therefore in concert with other countries in developing a way to levy GST on imported goods and services.

Early indications are that a solution could be developed at the OECD level that would require foreign suppliers to register for GST in the country of consumption. This solution is versatile and would be capable of extending to intangibles.

The solution will also need to address imports of low value goods. We expect that the Government will closely consider various options including the foreign supplier rules (for digital downloads) already introduced by some countries.

For more information, please contact:
Eugen Trombitas
eugen.x.trombitas@nz.pwc.com
+64 9 355 8686

Gary O'Neill
gary.oneill@nz.pwc.com
+64 9 355 8432

Ian Rowe
ian.rowe@nz.pwc.com
+ 64 4 462 727

Singapore

New e-Tax Guide on the re-import of value-added goods

The Inland Revenue Authority of Singapore ("IRAS") has released a new e-Tax Guide on the re-import of value-added goods on 10 December 2014 which explains the qualifying conditions under which a GST-registered business is entitled to claim GST incurred on the re-import of goods previously sent overseas for value-added activities (e.g. testing, repair or assembly).

Prior to 1 January 2015, a GST-registered business is not entitled to recover the full import GST as input tax unless the Comptroller of GST grants remission under Section 89(1) of the GST Act.

The amended GST legislation allows a GST-registered business to claim the full import GST from 1 January 2015, subject to certain stipulated conditions.

New IRAS audit initiative

The IRAS will be stepping up their GST compliance audit on large companies in 2015 to check on the accuracy of their GST returns. While such audits are a matter of routine given the self-assessment nature of GST reporting, what is new this time round, is that the IRAS will conduct a field audit for selected large companies. However, certain businesses selected for the field audit will be offered the opportunity to participate in the Assisted Compliance Assurance Programme (ACAP) in place of the field audit. In other words, the IRAS will only initiate the field audit on businesses who have decided not to participate in the ACAP. We note that the IRAS has been progressively sending out invitation letters to large businesses on the above since late last year.

For more information, please contact:
Koh Soo How
soo.how.koh@sg.pwc.com
+65 6236 3600

Weijie Lin
weijie.lin@sg.pwc.com
+65 6236 7481

South Korea

Proposed Tax Amendment expected to be implemented in January 2015

Under the newly enacted Article 33 of the Presidential Enforcement Decree of Korean VAT Law amendment, when a domestic hospital or medical institution supplies clinical test services to a foreign pharmaceutical company and receives consideration for the supply of services in a foreign currency, zero-rating VAT will apply to the supply of these services. The proposed changes will be effective from the supply of services on or after the date of implementation which is expected to take place in late January 2015.

Refund for VAT

Under existing Article 107(6) of Special Tax Treatment Control Law of Korea ("STTCL"), VAT refund is available for a non-resident foreign entity for the incurred business-related costs associated with meals and accommodation, advertisement, electricity and communications, real estate lease, repair of building and structure for office used in Korea, and rental of office furniture and supplies. The VAT refund is available if the refundable VAT amount exceeds KRW 300,000.

The application for the VAT refund can be submitted to the Seoul Regional National Tax Office for eligible expenses incurred from 1 January to 31 December by no later than the 30 June of the following year. In this regard, non-resident foreign entities must file application for the VAT refund by 30 June 2015 for the VAT refund in connection to goods and services purchased during the calendar year 2014 from 1 January 2014 to 31 December 2014.

For more information, please contact:
Dong-Keon (D.K.) Lee
dklee@samil.com
+82 2 709 0561

Taiwan

Penalties for failure to issue Government Uniform Invoices ("GUI") when conducting barter transactions

In accordance with a newsletter issued by the tax authority on 6 October 2014, the Kaohsiung High Administrative Court recently ruled that in all barter transactions where the exchange of goods and services involves non-monetary consideration, there are two transactions for VAT purposes. In other words, goods or services exchanged-out is treated as a sales transaction, while goods or services exchanged-in is treated as a purchase transaction.

Therefore, valid GUIs must be issued by both parties involved in order to substantiate both the sales and purchase transactions. Failure to issue/obtain GUIs will result in penalties imposed for tax evasion or non-compliance under Article 51 of the Business Tax Act or Article 44 of the Tax Collection Act, whichever is higher.

VAT treatment of sale of foreign registered patents and trademarks

The Ministry of Finance ("MOF") promulgated Tax Ruling No. 10304022020 on 18 November 2014, which states that the sale of foreign registered patents and trademarks by a Taiwanese company to another Taiwanese company would be deemed as services supplied and utilised within the territory of Taiwan. It is classified as a sale of services in Taiwan, and is subject to the standard VAT rate of 5%.

For more information, please contact:
Lily Hsu
Lily.hsu@tw.pwc.com
+886 2 27296666 Ext. 26207

Li-Li Chou
li-li.chou@tw.pwc.com
+886-2-27296666 Ext. 2368

Vietnam

New decree and circular on invoicing

The Government has recently issued Decree 91/2014/ND-CP ("Decree 91") on 1 October 2014, amending current Decrees on VAT, other kinds of taxes and tax administration. Following Decree 91, the Ministry of Finance issued Circular 151/2014/TT-BTC ("Circular 151") on 10 October 2014 guiding the implementation of Decree 91. Both Decree 91 and Circular 151 became effective from 15 November 2014.

Some of the notable points of the Decree and Circular include:

- The sale of mortgaged assets by the borrower as authorised by the lender to settle a guaranteed loan is VAT exempt.
- For purchases under installment or deferred payment terms, the requirement for input VAT adjustment at 31 December no longer exists.
- Companies with prior year annual revenue of VND 50 billion (– USD 2.4 million) or less can declare VAT on a quarterly basis.

For more information, please contact:
Richard J Irwin
+84 8 3 823 0796
r.j.irwin@vn.pwc.com

Contacts

Australia
Peter Konidaris, Partner
peter.konidaris@au.pwc.com
Tel: +61 3 8603 1168

Cambodia
Heng Thy, Partner
heng.thy@kh.pwc.com
Tel: +855 23 218 086

China
Alan Wu, Partner
alan.wu@cn.pwc.com
Tel: +86 10 6533 2889

India
Vivek Mishra, Executive Director
vivek.mishra@in.pwc.com
Tel: +91 124 330 6518

Anita Rastogi, Associate Director
anita.rastogi@in.pwc.com
Tel: +91 124 330 6531

Indonesia
Ali Widodo, Partner
ali.widodo@id.pwc.com
Tel: +62 21 52890623

Abdullah Azis, Associate Director
abdullah.azis@id.pwc.com
Tel: +62 21 5289 0601

Japan
Masanori Kato, Partner
masanori.kato@jp.pwc.com
Tel: +81 3 5251 2536

Kotaku Kimu, Director
kotaku.kimu@jp.pwc.com
Tel: +81 3 5251 2713

Laos
Thavorn Rujivanarom, Partner
thavorn.rujivanarom@th.pwc.com
Tel: +662 344 1444

Malaysia
Wan Heng Choon,
Senior Executive Director
heng.choon.wan@my.pwc.com
Tel: +60 3 2173 1488

New Zealand
Eugen Trombitas, Partner
eugen.x.trombitas@nz.pwc.com
Tel: +64 9 355 8686

Gary O'Neill, Director
gary.oneill@nz.pwc.com
Tel: +64 9 355 8432

Ian Rowe, Director
ian.rowe@nz.pwc.com
Tel: +64 4 462 7274

Philippines
Malou P. Lim, Partner
malou.p.lim@ph.pwc.com
Tel: +63 2 459 2016

Singapore
Koh Soo How, Partner
soo.how.koh@sg.pwc.com
Tel: +65 6236 3600

Weijie Lin, Manager
weijie.lin@sg.pwc.com
Tel: +65 6236 7481

South Korea
Dong-Keon (D.K.) Lee, Partner
dklee@samil.com
Tel: +82 2 709 0561

Sri Lanka
Hiranthi Ratnayake, Director
hiranthi.c.ratnayake@lk.pwc.com
Tel: +94 11 4719838

Taiwan
Lily Hsu, Partner
lily.hsu@tw.pwc.com
Tel: +886 2 2729 6666 Ext. 26207

Thailand
Somboon Weerawutiwong, Partner
somboon.weerawutiwong@th.pwc.com
Tel: +662 344 1000 Ext. 1247

Vietnam
Richard J. Irwin, Partner
r.j.irwin@vn.pwc.com
Tel: +84 8 3823 0796

David Fitzgerald, Partner
david.fitzgerald@vn.pwc.com
Tel: +84 8 3824 0116

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