

An aerial view of a white and blue high-speed train on a track, with a red train visible in the background.

# International Tax Services

A cluster of yellow cubes connected by black lines, arranged in a geometric pattern.

## Overview

To succeed in globalised markets, multinational businesses must stay abreast of tax, legislative and regulatory developments around the world. Meanwhile, challenges such as new business models, liquidity concerns and evolving information technologies make efficient management of global business more complex than ever.

Tax departments need to be agile, aware of both internal and external developments, and able to deal with competing goals and interests on a global scale. To achieve a competitive worldwide effective tax rate, global tax strategies must be fully aligned with corporate strategy, planning and operations.

International Tax Services (ITS) include a range of solutions designed to reduce direct and indirect tax costs through the use of efficient structuring techniques and trading arrangements<sup>1</sup> and planning for global tax developments (i.e. Pillar Two global minimum tax rules).

## Outbound Services:

Thai-based multinational corporations (MNCs) face the complexities of different tax jurisdictions as they expand globally. To remain competitive, they must examine the tax implications of their business strategy in each jurisdiction where they currently conduct, or plan to conduct, business.

PwC's ITS professionals have a wealth of experience in helping companies address their cross-border needs. We advise on all aspects of international taxation to help MNCs achieve their business goals in a tax-efficient manner, locally and globally. We can advise on the following areas:

- Tax-efficient holding company locations
- Cross-border financing and treasury solutions
- Income tax treaties, profit repatriation, loss utilisation
- Inbound and outbound structuring
- Managing intellectual property and intangible assets
- Tax-efficient supply chain and shared services
- Pillar Two impact assessment and advisory services

## Inbound Services:

The current economic environment raises a number of challenges and opportunities for those foreign-based MNCs with investments in Thailand or considering Thai investments.

The interaction between Thai and foreign tax regimes often provides opportunities for foreign-based MNCs to reduce taxes on a worldwide basis, resulting in permanent cash savings.

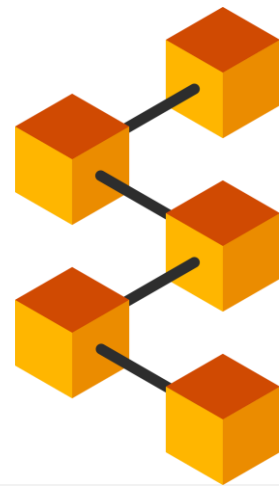
We offer a variety of strategies to help foreign MNCs meet their business needs while maintaining a competitive effective tax rate. These may include repatriating cash or redeploying funds in a tax-efficient manner, reducing tax costs on investment exit, establishing a tax effective structure when exploiting acquisition opportunities and refinancing debt efficiently.

Our approach is designed to ensure tax opportunities are exploited and adverse tax outcomes are identified and managed effectively. These strategies are aimed at ensuring the Thai business of a foreign MNC plays its part in implementing a globally effective and integrated approach to tax planning for the group. These strategies are carefully designed to ensure that desired tax outcomes are integrated seamlessly into business objectives and operations.

## Value Chain Transformation:

Value Chain Transformation is a unique value proposition. It brings together consulting expertise in areas including supply chain management, shared services and human resources with tax expertise in transfer pricing, commissionaire and agency structures, and VAT and customs duties, to create an integrated best practice model. Through our integrated offerings we can help you:

- Align tax/fiscal and operational models;
- Attain sustainable structural tax improvements, increase shareholder value and cash flow;
- Achieve a rationalised manufacturing capacity and improved physical distribution network;
- Establish potential synergies within your supply chain and operating structure;
- Align profits with restructured business processes;
- Achieve flexibility to accommodate future business changes.



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