

# Thailand

## Overview of CbC reporting requirements

First reporting fiscal year: Commencing on or after 1 January 2021

Consolidated group revenue threshold: THB 28,000,000,000

Filing deadline: 12 months following the end of the reporting fiscal year

Local filing required: Requirement suspended

Surrogate parent entity filing permitted: Yes

First review of the domestic legal framework: 2021/2022

## Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	None.
Exchange of information framework	None.
Appropriate use	None.

## The domestic legal and administrative framework

Thailand's 2021/2022 peer review included a recommendation that Thailand amend its legislation or otherwise take steps to ensure that enforcement provisions and monitoring relating to CbC reporting's effective implementation are provided for as contained in the terms of reference as from the first reporting period. Information has been provided showing that enforcement and monitoring relating to CbC reporting's effective implementation are now in place and the recommendation is removed.

Thailand's domestic legal and administrative framework meets all the other terms of reference.

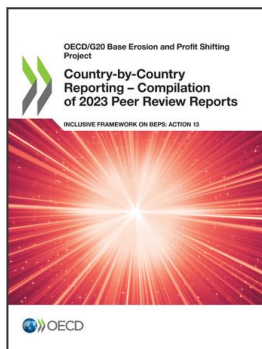
## The exchange of information framework

Thailand's 2017/2018 peer review included a recommendation that Thailand take steps to have qualifying competent authority agreements in effect with jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions and with which Thailand has an international exchange of information agreement in effect that allows for the automatic exchange of tax information. Thailand has now activated relationships under the Multilateral Competent Authority Agreement for exchanging CbC reports and this recommendation is removed.

Thailand's 2018/2019 peer review included a recommendation that Thailand take steps to implement the necessary processes or written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework. These processes are in place and the recommendation is now removed.

## Appropriate use of CbC reports

Thailand's 2017/2018 peer review included a recommendation that Thailand take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information. Thailand now has controls in place to ensure the appropriate use of CbC reports and this recommendation is removed.



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