

22nd Annual Conference

Maximise Shareholder Value 2024

Date:

Tuesday, 14 November 2023

Venue:

Royal Maneeya Ballroom, M Floor

Renaissance Bangkok Ratchaprasong Hotel

Get ticket



Early-bird rate

THB 5,500

Normal rate

THB 6,000

Embracing today's complexities, welcoming tomorrow's opportunities

The tax environment is rapidly changing both globally and in Thailand. Companies and groups that embrace these changes and develop their tax expertise and preparedness in this evolving landscape will have a competitive edge in navigating through areas of uncertainty and minimising tax costs and administrative burdens of compliance.

On the global front, the Pillar Two – Global Minimum Tax will significantly change the way multinationals operate and manage their accounting and tax functions. At the same time, there are still upcoming areas of change in international taxation that are fast approaching, including the effects of Pillar One and the reallocation of taxing rights.

As the global economy continues to recover from the pandemic, the ways in which businesses conduct themselves in the modern digital climate are forcing taxpayers to take a global approach when thinking about tax issues. The emphasis on transparency between related party transactions and information reporting continues to be a strong push locally as well, with significant transfer pricing reporting developments, and Thailand's adoption of the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI) – which will affect how taxpayers interpret and assess tax treaty benefits and business structuring going forward.

Furthermore, new business and tax laws, including the amendment to the Civil and Commercial Code earlier this year which introduced an additional business integration (or merger method) to Thailand, provides new complexities and a wide-range of consequences for taxpayers. Businesses need to holistically evaluate new legislation and the changing regulatory landscape to address commercial, legal and tax concerns that arise.

During this event, our legal and tax experts will examine these developments and share their views with you. You'll gain a better understanding of how the tax environment is likely to change in the coming years and be given insights and solutions to address the challenges ahead.

We hope you'll find our conference invaluable, and we look forward to seeing you there.

Tuesday, 14 November 2023

Time	Topic
08.15 – 08.45	Registration
08.45 – 09.00	Welcome note and opening remarks
09.00 – 09.30	Keynote speech by the Revenue Department
09.30 – 10.20	Thailand's tax update
10.20 – 10.40	Navigating data protection – what lies ahead for Thailand: international case studies and emerging privacy trends in Asia
10.40 – 11.00	Coffee break 
11.00 – 11.45	Business integration and the New Merger scheme
11.45 – 12.30	Charting the path for the future of capital management
12.30 – 13.30	Lunch 
13.30 – 15.00	Breakout session (Please select one of these sessions) A: Empower a brighter future by reinforcing current tax compliance: common tax compliance pitfalls B: Navigating the changing landscape of international taxation – BEPS, MLI and the Two-Pillar solution for global minimum tax and the reallocation of global taxing rights
15.00 – 15.20	Coffee break 
15.20 – 16.05	The future of tax and legal operating models
16.05 – 16.50	Managing transfer pricing risks through APA/MAP
16.50 – 17.00	Wrap up



Session
09.30 – 10.20

Thailand's tax update

The ever evolving landscape of tax regulations in the wake of the COVID-19 pandemic is undeniable. Businesses are experiencing a rapid transformation in the digital realm, necessitating swift adjustments in tax provisions. In this session, we'll offer a comprehensive overview of the latest tax updates that could impact your business to ensure you stay informed and prepared for the digital revolution.

In addition, there are notable changes to the duty imposed on cross-border trade. The Carbon Border Adjustment Mechanism (CBAM) is one of the key mechanisms under the EU ESG concept which impacts Thai businesses. As a starting point, Thai exporters of steel, aluminium, cement, fertiliser and electricity to the EU will need to work with EU importers for quarterly reporting on production information and carbon emissions. EU importers who can't get the required information or who don't meet the threshold will have to pay additional duties.

We'll also highlight Thai customs matters and audit trends as many companies are currently challenged at ports or audited by the Customs Audit or Investigation Teams for incorrect HS codes, customs valuation, and the most recent, non-compliance with regards to duty privileges (BOI). The financial impact for non-compliance with customs regulations can be significant as Customs can assess the retroactive duties for three to five years, plus a maximum of twice-imposed fines. We'll provide you with customs insights and share experiences in this section.

Session
10.20 – 10.40

Navigating data protection – what lies ahead for Thailand: international case studies and emerging privacy trends in Asia

After one year of PDPA enforcement, there's some subordinate legislation that business operators should be aware of: data subjects' complaint criteria and procedures of the authority, exemption for recording the data processing activities of small business operators, data security measures for data controllers and data breach notification criteria and procedures, and cases reported to the PDPC. We'll discuss updates on cases that fall under GDPR and US regulations, as well as privacy trends in Asia.

Session
11.00 – 11.45

Business integration and the New Merger scheme

There's been a tax debate surrounding the New Merger and the amendments to the Civil and Commercial Code (effective as of 7 February 2023). Although no amendments to the Revenue Code or written guidance have been issued, we'll share some notable tax and legal points under the New Merger scheme.

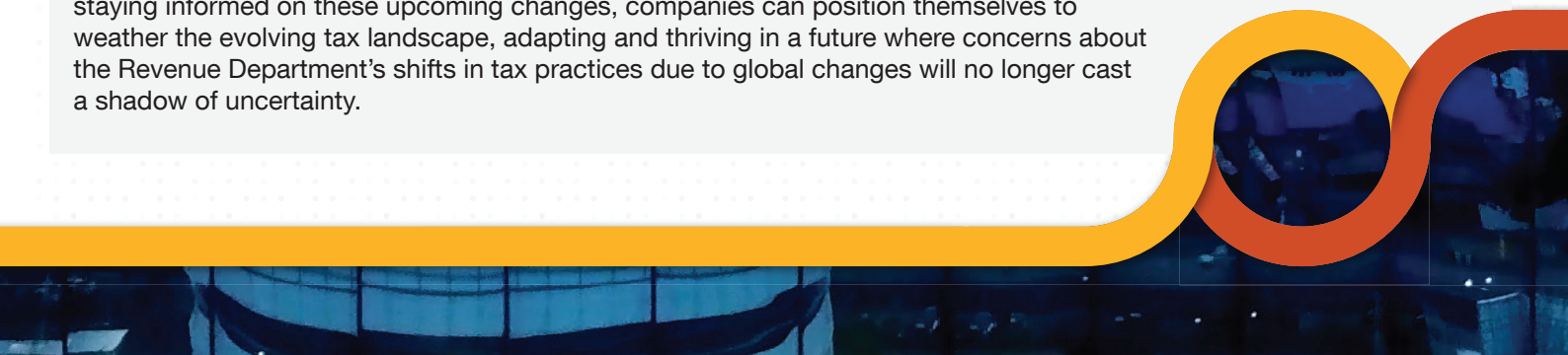
In addition, we'll briefly touch on common tax issues which may arise from various business integration methods, taking into account your commercial objectives to determine the most suitable method for you.

Session
11.45 – 12.30

Charting the path for the future of capital management

For entrepreneurs and businesses, the age-old dilemma of choosing between debt and equity funding has remained a fundamental decision when embarking on business ventures. However, impending shifts in tax practices in Thailand, influenced by global trends such as the introduction of financial service transfer pricing (FSTP) by the OECD, have brought new dimensions to this decision-making process. These changes have not only raised questions about the effectiveness of previously employed tax planning strategies which thrived – possibly due to legal ambiguities – but might have also rendered them obsolete.

The objective of this session is to revisit the timeless question on capital structuring and to give updates on regulations and on how to integrate emerging trends. By proactively staying informed on these upcoming changes, companies can position themselves to weather the evolving tax landscape, adapting and thriving in a future where concerns about the Revenue Department's shifts in tax practices due to global changes will no longer cast a shadow of uncertainty.



Session
13.30 – 15.00

Breakout session: Your choice

Session A:

Empower a brighter future by reinforcing current tax compliance: Common tax compliance pitfalls.

In anticipation of an upcoming wave of new tax regulations, many companies have shifted their focus towards preparing to adapt to these changes. However, this heightened focus on new regulations has, in some instances, led to the neglect of compliance requirements that already exist, possibly due to legal ambiguities, the tax authority's unexpected interpretations or improperly designed tax practices and policies.

This session aims to foster the exchange of experiences, highlighting common pitfalls, addressing frequently misunderstood topics. It will also be an opportunity to share interesting matters that raise awareness, enhance your current tax compliance and pave the way for a brighter future

Session B:

Navigating the changing landscape of international taxation – BEPS, MLI, and the Two-Pillar Solution to implement a global minimum tax and the reallocation of global taxing rights.

Thailand's adoption of the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI) means that many of the tax treaties that Thailand is a counterparty to have been amended.

Additionally, the OECD's Two-Pillar Solution will bring the more-than-century old international tax rules up to date and will apply to large MNEs.

- Pillar One, intended for 2025, aims to ensure a fairer profit distribution by reallocating taxing rights to market jurisdictions.
- Pillar Two, effective as of 2024, implements a global minimum tax of 15%. The rules will introduce a mechanism for groups to pay a top-up tax in jurisdictions where their effective taxes fall below the minimum rate.

Taxpayers should evaluate these new rules and assess the impact as soon as possible, given the pace at which many of them are being implemented.

Session
15.20 – 16.05

The future of tax and legal operating models

The tax and legal landscape is changing faster than ever and staying compliant can feel like a major challenge.

Today's tax and legal functions are facing unprecedented levels of external pressure and internal challenges to meet the increasing demands being placed on them to do more with less. Regulatory requirements are becoming increasingly complex. There's also more need for information transparency, and both tax authorities and management boards are demanding that risks are effectively managed. This constantly changing environment is driving companies to reimagine and transform their businesses.

In this session, we'll examine how having a robust tax policy and tax control framework can help manage your internal tax risk profile. Also, we'll look at how we can harness the power of technology and artificial intelligence to drive greater efficiency, improve processes, manage risks and help drive greater value for the tax and legal functions.

Session
16.05 – 16.50

Managing transfer pricing risks through APA/ MAP

Higher visibility for taxpayers' related-party transactions and other transfer pricing data have intensified transfer pricing audit cases over recent years. Meanwhile, having robust transfer pricing documentation alone is never sufficient for taxpayers to withstand transfer pricing audits without a hefty tax liability – which in turn creates double taxation for groups. Taxpayers should be well aware of what options are available to address double taxation.

During the session, we'll go through recent transfer pricing audit cases and demonstrate how costly it is when faced with transfer pricing assessments. We'll also share with you alternatives to resolve cross-border disputes and how to prevent transfer pricing disputes from happening in the first place with the Bilateral Advance Pricing Agreement (BAPA).

Event details

Date:	14 November 2023
Venue:	Royal Maneeya Ballroom, M Floor, Renaissance Bangkok Ratchaprasong Hotel
Language:	All sessions will be conducted in Thai.
Dress code:	Business Attire

Registration

Please visit

<http://short.happenn.com/pwc-22nd-annaul-conference-general>



Methods of Payment

- ☐ Crossed cheque or bank draft made payable to PricewaterhouseCoopers Legal & Tax Consultants Ltd.
- ☐ Transfer to:
PricewaterhouseCoopers Legal & Tax Consultants Ltd.
Bangkok Bank Public Co., Ltd., Sathorn Branch
Savings Account No. 142-0-629-39-4
Tax ID No. 0105531096223 (Head Office)

Please fax your pay-in slip and Withholding Tax Certificate to:

fax no. +66 (0) 2286 8200 or email to th_pwcaccountsreceivable@pwc.com

Please send the original Withholding Tax Certificate by post to:

PricewaterhouseCoopers Legal & Tax Consultants Ltd. (Finance Department)

15th Floor, Bangkok City Tower

179/74-80 South Sathorn Road

Thungmahamek, Sathorn Bangkok 10120

Collection Call Centre: Tel: +66 (0) 2844 1000 ext. 4521, 4528, 4531

Seminar Fee

Early-bird rate Deadline for Early-bird registration: 20 October 2023		Normal rate	
Early-bird rate	Net cash payment (+VAT7%-WHT3%)	Normal rate	Net cash payment (+VAT7%-WHT3%)
THB 5,500	THB 5,720	THB 6,000	THB 6,240

- The organisers reserve the right to amend programmes without prior notice.
- Refunds will not be provided for any cancellation.

For more information

PwC Tax & Legal Thailand Call Centre Tel. +66 (0) 2844 2498

or email us to th_pwc_tax_and_legal_event@pwc.com