

Thailand

Thailand to Implement Global Minimum Tax Under Pillar Two

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The Cabinet has approved, in principle, a proposal to collect the global minimum tax in Thailand in line with Pillar Two of the OECD/G20 Inclusive Framework on BEPS.

In a meeting on 7 March 2023, the Cabinet directed the Revenue Department to draft legislation and determine the appropriate guidelines to:

- collect the top-up tax in accordance with Pillar Two;
- allocate 50-70% of the top-up tax collection to the National Competitiveness Enhancement for Targeted Industries Fund under the National Competitiveness Enhancement for Targeted Industries Act B.E. 2560 (2017) (subject to further discussions with the Board of Investment (BOI)); and
- deliver information on payers of top-up tax to the BOI;

The BOI was assigned the following tasks:

- amend the National Competitiveness Enhancement for the Targeted Industries Act B.E. 2560 (2017) to increase funding sources by way of the top-up tax collections, to support the implementation of investment promotion measures;
- propose measures to enhance competitiveness by subsidizing qualifying investors; and
- propose measures to mitigate the impact of the new tax collection guidelines under the Investment Promotion Act B.E. 2520 (1977).

The Cabinet notes that the Revenue Department is currently drafting a law on the collection of the top-up tax, which is expected to be issued in 2023 and take effect in 2025.

Further details will be reported in due course.

See also

[Thailand joins inclusive framework for implementing measures against BEPS \(6 June 2017\)](#)

[Thailand - Country Analyses - Corporate Taxation section 7.4. Tax treaties and other agreements](#)