

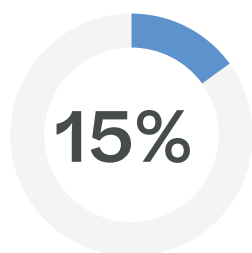


Global Minimum Tax (Pillar Two) in Thailand

What multinational groups need to know

The global tax landscape is undergoing a significant transformation with the introduction of the OECD Pillar Two – Global Minimum Tax (GMT) rules.

These rules aim to ensure that large Multinational Enterprises (MNE) pay a minimum effective tax rate of



in each jurisdiction where they operate, thereby reducing base erosion and profit shifting to low-tax jurisdictions.

Thailand has enacted and adopted the OECD Pillar Two Inclusive Framework, which is effective for fiscal years beginning on or after **1 January 2025**.

Who is subject to Pillar Two?

A MNE Group will be subject to Pillar Two if the following conditions are met.

- The Group has annual group consolidated revenue exceeding EUR 750 million.
- The Group consolidated revenue threshold is met in at least two out of the four preceding fiscal years.
- The Group has at least one entity or permanent establishment located in a jurisdiction different from that of the Ultimate Parent Entity (UPE).

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Filing obligations and deadlines

Once an MNE Group falls within the scope of Pillar Two, mandatory compliance obligations arise.

The Group is required to submit the following forms to the Thai Revenue Department:



Notification form (mandatory)

Required to be filed in Thailand.



GloBE Information Return (GIR)

Required to be filed in the country of UPE, but depending on the involved jurisdictions within the group.



Top-Up Tax return

Required to be filed in Thailand only if Top-Up Tax is payable.

The filing deadline is within 15 months after the end of the Group's fiscal year. For FY25 of the MNE Group with an accounting period ended December 2025, the filing deadline is extended to 30 June 2027.

Next steps



It is advisable for the MNE Group to conduct an assessment to determine the potential impacts, availability of reliefs, and Top-up Tax exposure in Thailand.

How we can assist



Forvis Mazars team has dedicated Pillar Two specialists both locally and globally to support the MNE Group in meeting their compliance obligations.

Our services include:

- Pillar Two assessment, including identification of the in-scope entities
- Transitional CbCR Safe Harbour and Permanent Safe Harbour analysis
- Top-Up Tax calculations
- Compliance and filing assistance with local tax authorities
- Advisory services on Pillar Two implications for transactions and restructuring

For the MNE Group interested in adopting automated tools, **Forvis Mazars** has developed **Pillar Two tools** that simplify complex processes, ensuring seamless navigation from start to finish.

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