

ศูนย์บริการลงทุน
สำนักงานคณะกรรมการส่งเสริมการลงทุน
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**BOI Reaffirms Continued Tax Incentives;
Introduces New OECD-Aligned “Tax Credit” Scheme**

The Thailand Board of Investment (BOI) has reaffirmed that all existing tax incentives—both exemptions and reductions—remain fully in place, and emphasized that no changes will be made to the tax privileges available to current or new investors. At the same time, the BOI is preparing for a new incentive tool, the Qualified Refundable Tax Credit (QRTC), designed to help multinational enterprises manage the impact of the OECD Global Minimum Tax (GMT) while providing investors with additional flexibility.

“We would like to reaffirm that Thailand will continue to offer current tax exemptions and reductions under the BOI promotion system. In parallel, the BOI, in collaboration with the Ministry of Finance, has been preparing measures to address the Global Minimum Tax rules by introducing a new type of incentive called the ‘Qualified Refundable Tax Credit’ (QRTC), designed to provide additional options for multinational investors who are required to pay top-up tax under the OECD’s criteria. Investors who do not fall under the GMT rules can still apply for the BOI’s existing incentives,” Mr. Narit Therdsteerasukdi, Secretary General of the BOI, said.

The criteria set by the OECD require multinational enterprises with annual consolidated revenues of at least 750 million euros to maintain an effective tax rate (ETR) of no less than 15 percent. Enterprises with an ETR of less than 15 percent are required to pay a top-up tax to the jurisdiction of the parent company or relevant subsidiaries.

To mitigate the impacts of the upcoming new global minimum tax rules, the BOI is in the process of revising the National Competitiveness Enhancement for Targeted Industries Act to introduce the QRTC as a new mechanism for granting incentives in line with the OECD guidelines. With this effective tool, Thailand aims to attract additional investments, maintain manufacturing bases in target industries, and stimulate new investments that contribute to the country’s competitiveness and economic growth.

The QRTC scheme allows companies to use investment capital and essential expenditures that contribute to the country’s competitiveness, such as research and development, high-skilled workforce development, standards upgrading, and productivity enhancement, to calculate a tax credit. This credit can be applied to various types of tax payments as specified by the Ministry of Finance. The scheme

helps mitigate the impacts of top-up tax collection, improve business liquidity, and support continuous investment to enhance the country's competitiveness.

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