

Independent Study Paper Title : Tax Returns Filing of Several Permanent Establishments for Foreign Corporations
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ABSTRACT

This study explored the process of filing tax return and tax payment of the foreign corporation, which has more than one Permanent Establishments in Thailand. This study considered the unique entity and the meaning of Permanent Establishment in accordance with the OECD principle in order to find alternatives and approaches to improve it. This study look at, United States laws and process, as the United States was one of the most famous taxation process in the world. Moreover, this paper also shows the Double Tax Agreement between Thailand and United States, which enacted depend on OECD principle.

This study found that the main problem of Tax Returns filing and Tax Payment of Permanent Establishment under Thai law is the problem of relating cryptic of the process. Since the Revenue Code does not specify the obvious process in separate filing tax returns or Tax Payment for the two Permanent Establishments, which has the separate transactions. Therefore, here is no formulation for tax-payer (Permanent Establishment) and the tax authority.

To resolve the problems regarding Permanent Establishment Tax Returns filing and Tax Payment, the Revenue Code should add the obvious process of filing tax returns and tax payment for the Permanent Establishment. In case of Permanent Establishments which have separate transaction there should be a separate file tax returns process, and the meaning of “Permanent Establishment” in the Revenue Code also should be made cleared.