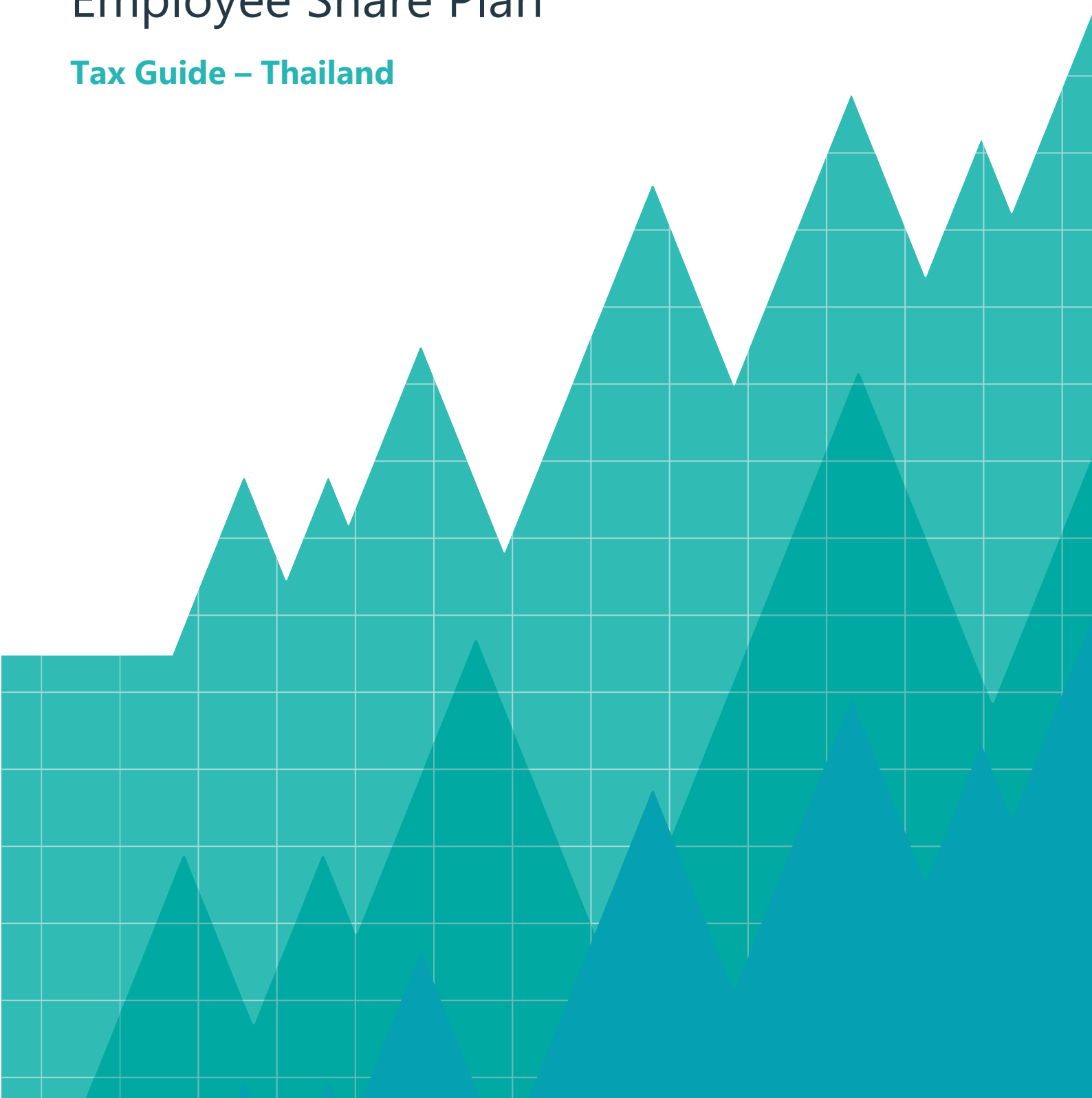


Wood Guidance

Employee Share Plan

Tax Guide – Thailand



Wood Guidance Employee Share Plan Tax Guidance – Thailand

This information is for guidance only and may differ according to your personal circumstances. Other than for the 'Income tax and social tax for mobile employees' section, it assumes that for tax purposes you are a domiciliary, national and resident of Thailand and have been/will be at all material times – i.e. from the date on which you purchase your first shares in the Plan until the end of the Plan period 24 months later – this is known as the Holding Period.

The 'Income tax and social tax for mobile employees' section outlines the tax treatment for your shares if you have spent time working outside Thailand – for these purposes, it is assumed that you are tax resident in the respective countries where you are working at the relevant times.

This is not tax advice tailored to your personal situation. If you require confirmation of your personal tax position, you should contact a professional tax advisor.

This information is understood to be correct as at 6 November 2018. Any future changes to legislation or tax rates may affect this information.

Income tax and social tax

Will I have to pay income tax or social tax in respect of my Shares?

The table below sets out the tax point and the taxable amount for the shares received under the Plan:

Income tax and Social Security		
	Point at which tax will be paid	Taxable amount
Purchased Shares	No income tax or social tax will apply.	N/A
Matching Shares	Income tax will be payable when your Matching Shares are delivered to your personal account following the end of the Holding Period. This is known as the Delivery Date.	The amount subject to income tax will be the market value of the shares on the Delivery Date.
Dividend Shares	You will be taxed upon receipt of the cash dividend used to acquire Dividend Shares. No social tax will be payable on this amount	The amount subject to income tax is the cash dividend received and used to acquire the Dividend Shares.

How do I pay the income tax and social tax in respect of my Shares?

Your employer will **not** withhold the income tax and social tax payable on the Matching Shares. Your employer will **not** withhold any income tax due on the dividend income used to acquire the Dividend Shares. You are responsible for any tax due on the dividend income.

Wood Guidance Employee Share Plan Tax Guidance – Thailand employees

Income tax and social tax for mobile employees

Will I have to pay income tax or social tax in respect of my Shares if I have only spent a portion of the Holding Period working in Thailand?

Thailand taxes its residents and non-residents on their assessable income derived from employment or business carried on in Thailand, regardless of whether such income is paid in or outside Thailand. Residents who derive income from abroad are taxable on that income if remitted into Thailand in the year in which it is received.

How do I pay the income tax and social tax due in respect of my Shares?

Your employer will **not** withhold the income tax and social tax payable on the Matching Shares.

Your employer will **not** withhold any income tax due on the dividend income used to acquire the Dividend Shares. You are responsible for any tax due in Thailand on the share derived income.

Sale of shares

Will I incur a further tax liability and social tax when I sell my Shares?

You may be liable to pay capital gains tax on any gains arising when you sell your shares. The taxable gain is calculated as the difference between your sale proceeds and the total of: (i) the amount that you paid for the shares (for your Purchased Shares and Dividend Shares) and (ii) any amount previously subject to income tax (for your Matching Shares).

You are responsible for reporting any chargeable gains and paying any tax due via your personal tax return (see below).

Reporting

Will I have any reporting requirements?

Yes. All persons earning income are required to file a tax return no later than 31 March of the following year, except for individuals whose income from employment is THB 120,000 or less (for single persons) or THB 220,000 or less (for married persons) and in the case of having income from other sources (with or without employment income) THB 60,000 or more (for single persons) or THB 120,000 or more (for married persons). Details on your income relating to your shares should be detailed in this return.

Individuals engaged in most forms of business are also required to file a return of their income for the first six months of the year by 30 September and pay the tax due.

Wood Guidance Employee Share Plan Tax Guidance – Thailand

Appendix 1 – relevant tax rate summary

This appendix sets out the relevant tax rates in Thailand, for the tax year ending 31 December 2018.

Income tax		
	Maximum effective tax rate	Notes
Federal income tax	35%	Progressive rates of tax apply. The maximum tax rate applies to income over THB5million.

Dividends and capital gains tax		
	Maximum effective tax rate	Notes
Dividends	35%	Foreign sourced dividends and capital gains are taxed at progressive personal income tax rates if repatriated/remitted to Thailand during the same tax year that the funds were received by a Thai tax resident. Note that foreign exchange rules may require the repatriation of the funds.
Capital Gains	35%	