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ROYAL DECREE

Issued under the Revenue Code

Governing the Exemption from Revenue Taxes (No. 10)

B.E. 2500 (1957)

BHUMIBOL ADULYADEJ, REX.

Given on the 30th Day of August B.E. 2500 (1957)

Being the 12th Year of the Present Reign

His Majesty King Bhumibol Adulyadej is graciously pleased to proclaim that,-

Whereas it is deemed proper to modify the granting of exemption from revenue taxes under Section 3 of the Revenue Code;

By Virtue of Section 95 of the Constitution of the Kingdom of Thailand B.E. 2475 (1932) as amended in B.E. 2495 (1952) and Section 3 of The Revenue Code as amended by the Revenue Code Amendment Act (No. 10) B.E. 2496 (1953), the King's Most Excellent Majesty hereby enacts a Royal Decree as follows:

Section 1 This Royal Decree is called the "Royal Decree Issued under The Revenue Code Governing the Exemption from Revenue Taxes (No. 10) B.E. 2500 (1957)."

Section 2 This Royal Decree shall come into force as from the day following the date of its publication in the Government Gazette.

Section 3 The following shall be repealed-

(1) The Royal Decree Issued under the Revenue Code Governing the Exemption from Revenue Taxes (No. 5) B.E. 2496,

(2) The Royal Decree Issued under the Revenue Code Governing the Exemption from Revenue Taxes (No. 6) B.E. 2497,

(3) The Royal Decree Issued under the Revenue Code Governing the Exemption from Revenue Taxes (No. 7) B.E. 2498.

Section 4 Exemption from the various revenue taxes imposed under the Revenue Code shall be granted to-

(1) The United Nations Organization, its specialized agencies and the officials of such organizations or agencies performing their duties in Thailand, whenever Thailand is under the obligation to grant exemption under a convention or an agreement,

(2) An embassy, legation, consulate-general, consulate, member of

diplomatic or consular corps and a person who is by agreement regarded as a member of diplomatic corps, subject, however, to the principle of reciprocal treatment.

Provided, however, that the exemption is not extended to business tax on gross receipts in respect of imported goods which are exempt under Section 79 ter (10) but subsequently become liable to business tax under Section 79 quinqué of the Revenue Code.

(R.D. (No. 25) B.E. 2510) This last paragraph has become obsolete since business tax was replaced by VAT since 1st January B.E.2535)

Section 5 Tax-payers shall be exempted from income tax under Chapter 3, value added taxes under Chapter 4, and specific business tax under Chapter 5, Title 2, of the Revenue Code, only in respect of a fraction of one baht of the amount of tax computed.

(R.D. (No. 238) B.E. 2534) and shall be effective from 1 January B.E.2535 onwards)

Section 5 bis Exemption from income tax under Title 2, Chapter 3, Division 3, of the Revenue Code on that part of assessable income that is dividends or share of profits derived from a joint venture carrying on business in Thailand shall be granted to-

(1) Companies and juristic partnerships incorporated under Thai law,
(see D.I. No. Paw 119/2545) [Notes Link](#)

(see D.I. No. Paw 122/2545) [Notes Link](#)

(2) Companies and juristic partnerships incorporated under foreign law and carrying on business in Thailand.

(R.D. (No. 108) B.E. 2524 (1981)) and effective from the accounting period ending on or after 31 Dec. B.E. 2523 (1980) onwards

Section 5 ter (*Section 5 ter has become obsolete since business tax was replaced by VAT since 1 January B.E. 2535 (1992)*)

Section 5 quarter Exemption from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code shall be accorded in respect of income arising from international air transport to a company or juristic partnership incorporated under the law of a foreign country, only if such a country has accorded the same exemption to an enterprise of Thailand carrying on international transport since before B.E. 2527 (1984), subject to the principle of reciprocal treatment.

(R.D. (No. 139) B.E. 2526 (1983)) and effective from the accounting period ending on or after 31 Dec. B.E. 2526 (1983) onwards

Section 5 quinqu There shall be exempted from income tax under Division 3, Chapter 3,in Title 2 of the Revenue Code:

(1) That part of income of a finance company that represents interest on government bonds used as security for a loan granted by the Bank of Thailand for dealings in exchange of promissory notes according to the rules and procedures prescribed by the Bank of Thailand and approved by the Ministry of Finance;

(2) Income of a finance company derived from debtors in connection with the exchanges of promissory notes mentioned in (1), only if paid to Bank of Thailand;

Provided that the finance company may not treat losses incurred in connection with the dealings in (1) as expenses for the computation of net profits or net loss.

(R.D. (No. 154) B.E. 2527 (1984)) and shall be effective from 1 January B.E. 2527 (1984) onwards

Section 5 sex There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code on income derived from a transfer of the ownership in properties to a government agency or a governmental enterprise not being in a company or juristic partnership, but only if the compensation that the transferor receives is in the form of the right to use the transferred properties for production of his own goods.

(R.D. (No. 155) B.E. 2527 (1984)) and shall be effective from 1 January B.E. 2528 (1985) onwards

Section 5 septem There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code on income in the form of interest of foreign currency loans paid to-

(1) A financial institution of a foreign government set up by a specific law and the capital of which is totally owned by the government;

(2) A company or juristic partnership formed under a foreign law, only on interest received from;

(a) The Bank of Thailand;

(b) A governmental enterprise, if the loan has been approved by the Ministry of Finance.

Section 5 octo There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code for a company or juristic partnership incorporated under a foreign law and not carrying on business in Thailand for assessable income as follows:

(1) Interest on bonds or interest on debentures issued by government enterprises;

(2) The difference between the redemption price and the initial price of bonds or debentures initially offered to the public where such price is lower than the redemption price: provided only for bonds or debentures of the government, governmental enterprises, or an institution organized by a specific law of Thailand for the purpose of lending money to promote agriculture, commerce, or industry.

(3) Any benefit received from transferring bonds or debentures: provided only for bonds or debentures of the government, governmental enterprises, or an institution organized by a specific law of Thailand for the purpose of lending money to promote agriculture, commerce, or industry.

(R.D. (No. 429) B.E. 2548 (2005)) and shall be effective from 25 January B.E. 2548 (2005) onwards

“A company or juristic partnership incorporated under foreign law and not carrying on business in Thailand is eligible for tax exemption under the paragraph one in respect of investments in or transfer of ownership of the bonds before 13 October 2010, whereby the bonds were issued for sale before 13 October 2010. Where the registrar has not been informed of any transfer of ownership of the bonds, the date of transfer must be clearly mentioned in the bond transfer documents as evidence”.

(R.D. (No. 509) B.E. 2553 (2010)) and shall be effective from 13 October B.E. 2553 (2010) onwards

"Section 5 novies The income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code shall be exempted for foundations or associations, specifically on the income obtained from private school business established under the law governing private school, however, excluding income obtained from private school business outside the school system of tutorial school category established under private school."

Section 5 novem (Amending by R.D. (No. 589) B.E. 2558 (2015)) and shall be effective from 7 July B.E. 2558 (2015) onwards

(R.D. (No. 159) B.E. 2528 (1985)) and shall be effective from 18 April B.E. 2528 (1985) onwards

Section 5 decem There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code on income derived from charges collected for radio communication services in connection with international aviation between surface

and surface stations or between air and surface stations, radio communication in connection with meteorological services, and other relating services, paid to the juristic company or partnership assigned by the government with the execution of responsibilities under the convention on international civil aviation, but only on the portion collected from aviation companies.

(R.D. (No. 170) B.E. 2529 (1986)) and shall be effective from 4 February B.E. 2529 (1986) onwards

Section 5 undecim There shall be exempted from income tax under Division 2 and 3, Chapter 3, in Title 2 of the Revenue Code, on assessable income in the form of interest on deposits or interest on loans derived from operators of international banking facilities for extending loans in a foreign country under the Notification of the Ministry of Finance, Subject: Operation of international banking facilities by commercial banks dated 16 September B.E. 2535 (1992) or as subsequently amended, to -

(1) An individual who does not possess the Thai nationality and is domiciled or residing in a foreign country,

(2) A company or juristic partnership incorporated under a foreign law and not carrying on business in Thailand.

(Repealed by R.D. (No. 454) B.E. 2549 (2006) and shall be enforced until 17 April B.E. 2552 (2009).

(see also R.D. (No. 270) B.E. 2537 (1994))

(see also R.D. (No. 306) B.E. 2540 (1997))

(see also R.D. (No. 307) B.E. 2540 (1997))

Section 5 duodecim There shall be exempted from specific business tax under Chapter 5 in Title 2 of the Revenue Code the operation of international banking facilities by commercial banks under the Notification of die Ministry of Finance, Subject: Operation of international banking facilities by commercial banks dated 16 September B.E. 2535 (1992), or as subsequently amended: Only in respect of gross receipts under Section 91/5 (1) of the Revenue Code.

(R.D. (No. 259) B.E. 2535 (1992)) and shall be effective from 10 October B.E. 2535 (1992) onwards

(Repealed by R.D. (No. 454) B.E. 2549 (2006))

Section 5 tredecim There shall be exempted from specific business tax under Chapter 5 in Title 2 of the Revenue Code for businesses as follows:

(1) Sale of operators' immovable properties to the Real Estate Loan Administration Organization or the juristic company organized by financial institutions under the Royal Decree governing the Organizing of the Real Estate Loan Administration Organization B.E. 2540 (1997), to carry on the credit management of an immovable property under the approval from the Bank of Thailand.

(2) Sale of the Real Estate Loan Administration Organization's immovable property or the juristic company organized by financial institutions under the Royal Decree governing the organizing of the Real Estate Loan Administration Organization B.E. 2540 (1997), to carry on the credit management of an immovable property under the approval from the Bank of Thailand.

(R.D. (No. 303) B.E. 2540 (1997), and shall be effective from 23 May B.E. 2540 (1997) onwards)

(Repealed by R.D. (No. 454) B.E. 2549 (2006) and shall be enforced until 18 April B.E.2552 (2009), see also section 12 of R.D. (no.454))

Section 5 quattuordecim There shall be exempted from taxes, an issuance of a specific charity lottery of which the Council of Ministers has passed a resolution that the project is a benefit to the people:

(1) Income tax under Chapter 3, Division 2 in Title 2 of the Revenue Code for the lottery winning prize which allows the tax payer to deduct the income tax at the source at the rate of 1 percent of the prize, by not retaining or crediting regardless of all or in portion of such a deducted tax.

(2) Income tax under Chapter 3, Division 2 in Title 2 of the Revenue Code, for selling or discount from purchasing lotteries.

(3) Value added tax under Chapter 4 in Title 2 of the Revenue Code, for selling lotteries.

Regardless of whether or not such a sale has taken place before or after the date this Royal Decree came into force.

(R.D. (No. 310) B.E. 2540 (1997)) and shall be effective from 13 September B.E. 2540 (1997) onwards

Section 5 quindecim There shall be exempted from income tax under Division 3, Chapter 3 and the specific business tax under Chapter 5 in Title 2 of the Revenue Code for the transferring of the ownership or the possession right of lands without any remuneration to the Buddhist temple, Catholic church, or Mosque, established under the law governing

such purpose: provided only for the transferring the lands that does not make the Buddhist temple, Catholic church, or Mosque to have the total exceeding 50 rais of land.

(R.D. (No. 326) B.E. 2541 (1998)) and shall be effective from 10 October B.E. 2541 (1998) onwards

Section 5 sedecim There shall be exempted from specific business tax under Chapter 5 in Title 2 of the Revenue Code for income from sale of an immovable property which is the seller's place of business only the transferring of an immovable property which a registrant who is a public company or a juristic company merging together or transferring all business to one another under the rules, procedures, and conditions, prescribed by the Director-General.

(R.D. (No. 330) B.E. 2541 (1998)) and shall be effective from 17 October B.E. 2541 (1998) onwards

(see also Merger and entire business transfer (no.3) dated 19 October B.E.2555 (2012) Notes Link)

"Section 5 septuordecies The income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code shall be exempted for companies or juristic partnerships who are shareholders in a company on the benefits received from the merger or transfer of entire business to each other of business operators who are companies by transferring shares in exchange of shares in the new company so merged or of the company that has accepted the transfer of entire business, however, specifically that has been valued in money exceeding the capital and the transfer made within the same accounting period as the merger or transfer of entire business.

The merger or transfer of entire business to each other under paragraph one shall be in accordance with the bases, procedures, and conditions prescribed by the Director-General."

(R.D. (No. 542) B.E. 2555 (2012)) and shall be effective from 20 September B.E.2555 (2012) onwards

(see also Merger and entire business transfer (no.3) dated 19 October B.E.2555 (2012) Notes Link)

Section 5 Octodecim There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code to a company or juristic partnership for assessable income being dividends arising from holding shares in small and medium-sized enterprises (SMEs) or benefits arising from transferring such shares: provided under the

rules, procedures, and conditions as follows:

(1) It shall be a company set up under Thai law and shall be an equity participating juristic body under the Ministerial Notification governing the designation of the business of managing a venture capital fund in order to carry on the business of managing a venture capital fund and having the registered capital of not less than two hundred million baht, whereby the initial payment of shares shall not be less than half of the registered capital and the remainder shall be paid up within three years from the registering date.

The reduction of the registered capital shall be done when shares of the SMEs have been held for the period of not less than seven consecutive years

"(2) It shall be registered with the Securities Exchange Commission within 31st December 2011"

(R.D. (No. 481) B.E. 2552 (2009)) and shall be effective from 19 May B.E.2552 (2009) onwards

(3) It shall hold shares in SMEs at the amount of not less than the percentage of the paid-up registered capital of the company as follows:

(a) 20 percent for the first accounting period unless in the case where there is reasonable ground and is approved by the Director-General, it may be less than 20 percent,

((a) in paragraph one of (3) of Section 5 octuordecies, repealed by R.D. (No. 481) B.E. 2552 (2009))

(b) 40 percent for the second accounting period,

(c) 60 percent for the third accounting period,

(d) 80 percent for the fourth accounting period onwards,

Such SMEs shall be the business whose fixed assets excluding land does not exceed two hundred million baht and has hired labor of not more than two hundred persons or under the rules notified or designated by the Director-General after this Royal Decree is in force for three years

"(4) It shall hold shares in SMEs for a period not less than five years in consecutive accounting periods, except the following cases where holding of shares can be less than five years in consecutive accounting periods:

(a) the shareholding in small and medium enterprises listed on the Stock Exchange of Thailand for a period not less than three years in consecutive

accounting periods; or

(b) the shareholding in small and medium enterprises throughout the period that the said small and medium enterprises hold permanent assets, excluding land, not exceeding Baht two hundred million, and employ not more than two hundred employees."

(R.D. (No. 442) B.E. 2548 (2005)) and shall be effective from 24 November B.E. 2548 (2005) onwards)

(5) It shall appoint the party obtaining a license to operate securities businesses under the category of managing a venture capital fund under the law governing securities and exchange to manage the proceeds from joint ventures in the small and medium-sized enterprises.

Section 5 Novemdecim There shall be exempted from income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code for a company or juristic partnership for assessable income as follows:

(1) Dividends arising from the holding of shares in a company or juristic partnership set up to carry on a business of managing a venture capital fund and exempt from income tax under Sections 5 Octodecim.

(2) Any benefits from transferring shares of a company or juristic partnership set up to carry on a business of managing a venture capital fund and exempt from income tax under Section 5 Octodecim

(R.D. (No. 396) B.E. 2545 (2002)) and shall be effective from 31 January B.E.2545 (2002) onwards

"Section 5 viginti There shall be exempted from revenue taxes under Division 3, Chapter 3, in Title 2 of the Revenue Code for limited companies and public limited company incorporated under Thai law for assessable dividend income received from companies or juristic partnerships incorporated under foreign laws subject to the rules, procedures and conditions set out here below:

(1) The juristic companies or partnerships shall hold not less than twenty five per cent of the voting shares in the juristic companies or partnerships that pay dividends for a period not less than six months from the date of the acquisition of the shares until the date the dividends are received; and

(2) The said dividends must be derived from taxable net profits in the foreign countries of companies or juristic partnerships that pay dividends at the normal

rate of not lower than fifteen percent of the net profits regardless of whether or not there is a law in the countries of companies or juristic partnerships that pay dividends stipulating tax reduction or exemption for the net profits for such juristic companies or partnerships.

Section 5 unetviginti There shall be exemption from specific business tax under Division 2 Chapter 5 of the Revenue Code for revenue from sale of immovable property held by a seller for business operation only for the sale of immovable property which is a factory together with land that belongs to the company or juristic partnership in order to relocate the business establishment to an industrial estate under the Act on Industrial Estate Authority of Thailand for an amount not exceeding the value of the new factory and land provided that the factory must be relocated to the industrial estate to be used as a new business establishment within one year before and after the date of execution of the agreement to sell the immovable property which is the existing factory together land and the above process must be completed by September 30, 2010.

The value of the immovable property which is the new factory together with land under paragraph one shall be based on the appraisal price for the purpose of charging the fees for registration of rights and juristic act under the Land Code, Pursuant to the rules, procedures and conditions prescribed by the Director-General of the Revenue Department."

(R.D. (No. 442) B.E. 2548 (2005)) and shall be effective from 24 November B.E. 2548 (2005) onwards

"Section 5 duovicies The income tax under Division 3, Chapter 3, in Title 2 of the Revenue Code, shall be exempted for a company or a juristic partnership established with an objective of operating venture capital business on the assessable income received from a transfer of shares in a medium and small enterprise, however, according to the following bases and conditions:

(1) Shall be a company or a juristic partnership that is in accordance with the bases, procedures and conditions under Section 5 octuordecies (1), (2), (3), paragraph one, (4) and (5).

(2) Shall be a medium and small enterprise that has been listed in the Stock Exchange of Thailand and shall be a business with permanent assets, excluding land, exceeding Baht two hundred million, or having employed more than two hundred employees.

(3) The shares so transferred must be those the company or juristic

partnership has held before the medium and small enterprise is listed in the Stock Exchange of Thailand and throughout the period the said enterprise has permanent assets, excluding land, not exceeding Baht two hundred million, and having employed not more than two hundred employees.”

(R.D. (No. 481) B.E. 2552 (2009)) and shall be effective from 19 May B.E.2552 (2009) onwards

“Section 5 travicies Income tax under Division 3, Chapter 3, in Title 2, of the Revenue Code shall be exempted on the dividends received from a company incorporated under Thai law or received from a mutual fund set up under the law governing securities and exchange for a new company that has been merged or a transferee company that has accepted the transfer of the entire business from other company, in the amount of one-half of the dividends so received, except:

(1) In the case where the company receiving the dividends is a listed company, when the tax shall be exempted equivalent to the dividends so received.

(2) In the case where the company receiving the dividends holds shares in the company paying the dividends at not less than twenty five percent of the total number of shares with right to vote, whereby the company paying dividends does not hold shares in the said company receiving the dividends, either directly or indirectly, when the tax shall be exempted equivalent to the dividends so received.

The company receiving dividends under paragraph one must have held shares or investment units creating such dividends for not less than three months from the date of acquirement of such shares or investment units until the date of having such income, and must continue holding said shares or investment units for a further period of not less than three months from the date of having such income, however, the period of time of holding said shares or investment units of the previous company that has been merged or of the previous company that is the transferor of the entire business shall also be counted.”

(R.D. (No. 534) B.E. 2555 (2012)) and shall be effective from 2 February B.E. 2555 (2012) onwards

“Section 5 quartuorvicies The income tax under Division 3, Chapter 3, in Title 2, of the Revenue Code, shall be exempted for a company which is an old company that has been merged or that is the transferor of business and duly applied for registration of dissolution of business, in the case of there having been a merger or a transfer of the entire business to each other between the companies operating life assurance business, insurance against loss business, commercial banking business, finance business, or credit

foncier business, on the income which is a reserve amount under Section 65 ter (1) (a) (b) or (c) of the Revenue Code, and which shall be included as income within the accounting period of merger or transfer of the entire business to each other under Section 74 (2) and (3) of the Revenue Code, as the case may be."

(R.D. (No. 573) B.E. 2556 (2013)) and shall be effective from 24 December B.E. 2556 (2013) onwards

Section 6 Exemption from stamp duty under Chapter 6 in Title 2 of the Revenue Code shall be granted to-

(1) The Bank of Thailand,
(2) The Government Housing Bank,
(3) The Bank of Agriculture and Agricultural Cooperatives,
(4) A person carrying on business of transport, only in respect of the receipt of passenger fares,

(5) A person carrying on entertainment business, only in respect of the receipt of the prices of admission,

(6) The Industrial Finance Corporation of Thailand,
(R.D. (No. 12) B.E. 2503 (1960)) and shall be effective from 28 June B.E. 2503 (1960) onwards

(7) A surety, only in respect of suretyship covering debts on accounts of loans and advances made by the Bank for Agriculture and Agricultural Co-operatives,

(8) An issuer of receipts, only in respect of receiving money representing loans and advances made by the Bank for Agriculture and Agricultural Co-operatives,

(R.D. (No. 29) B.E. 2511 (1968)) and shall be effective from 1 January B.E. 2512 (1969) onwards

The provisions of (4) (5) and (8) are not in use since the requirement for stamp duty on receipts has been revoked

(9) The National Housing Authority,
(R.D. (No. 47) B.E. 2516 (1973)) and shall be effective from 8 December B.E. 2516 (1973) onwards

(10) A transferor, only in respect of the transfer of registered or approved securities for which the Securities Exchange of Thailand acts as registrar,
(R.D. (No. 63) B.E. 2519 (1976)) and shall be effective from 18 August B.E. 2519 (1976) onwards

(11) A person liable to duty, in respect of an instrument on which the stamp duty is less than one baht, and in respect of a fraction of one baht for an instrument subject to stamp duty amounting to one baht or more, (R.D. (No. 100) B.E. 2523 (1980)) and shall be effective from 25 September B.E. 2523 (1980) onwards

(12) A transferor, only in respect of the transfer of bonds issued by the Bank of Housing Welfare, if the Bank of Thailand acts as registrar for such a transfer, (R.D. (No. 106) B.E. 2524 (1981)) and shall be effective from 9 November B.E. 2524 (1981) onwards

(13) A contractor, only in respect of being engaged in mineral ore exploration under a contract made with a governmental agency, and only if the governmental agency does not award any compensation other than the right of production in the area covered by the contract, (R.D. (No. 161) B.E. 2528 (1985)) and shall be effective from 14 November B.E. 2528 (1985) onwards

(14) The Financial Institutions Development Fund (Former: Fund for Rehabilitation and Development of Financial Institutions), (R.D. (No. 176) B.E. 2529 (1986)) and shall be effective from 25 July B.E. 2529 (1986) onwards

(15) A transferor, only in respect of the transfer of bonds issued by the Bank of Thailand, (R.D. (No. 187) B.E. 2530 (1987)) and shall be effective from 15 September B.E. 2530 (1987) onwards

(16) A transferor, only in respect of the transfer of instruments liable to stamp duty between a provident fund set up under the Ministerial Regulation No. 162 (B.E. 2526) issued under the Revenue Code Governing Provident Funds and a provident fund set up under the law governing provident funds, (R.D. (No. 210) B.E. 2533 (1990)) and shall be effective from 27 June B.E. 2532 (1990) onwards

(17) A transferor, only in respect of the transfer of bonds issued by a state enterprise, (R.D. (No. 235) B.E. 2534 (1991)) and shall be effective from 27 December B.E. 2535 (1991) onwards

(18) The Small Industries Finance Corporation,

(19) The Small Business Credit Guarantee Corporation (Former: Small Industries Credit Insurance)

(R.D. (No. 258) B.E. 2535 (1992)) and shall be effective from 1 January B.E. 2535 (1992) onwards

(20) The operator of international banking facilities under the exemption Notification of Ministry of Finance, Subject: Operation of international banking facilities by commercial banks dated 16 September B.E. 2535, or as subsequently amended: Only in the case where the operator is a person liable to duty under the Stamp Duty Schedule, (R.D. (No. 259) B.E. 2535 (1992)) and shall be effective from 10 October B.E. 2535 (1992) onwards

(Repealed by R.D. (No. 454) B.E. 2549 (2006)) and shall be effective from 18 April B.E. 2549 (2006) onwards

(21) The Bank for Export and Import of Thailand, (R.D. (No. 266) B.E. 2536 (1993)) and shall be effective from 7 September B.E. 2536 (1993) onwards

(22) A principal giving a power of attorney, only for appointing an individual as an agent for filing an income tax return in respect of a category of income designated by the Director-General in a Government Gazette, provided that such an agent delivers to the Revenue Department a disc, tape or other data recording media in a computer system for filing an income tax return, or delivers to the Revenue Department the data used in filing computerized income tax returns, for official usage: subject to the rules, procedures, and conditions prescribed by the Director-General,*

(R.D. (No. 281) B.E. 2538 (1995)) and shall be effective from 1 January B.E. 2538 (1995) onwards

(see also DG. N.-S.D. (No. 36) Notes Link

(23) A transferor, only in respect of a transfer of debentures, (R.D. (No. 285) B.E. 2538 (1995)) and shall be effective from 11 July B.E. 2538 (1995) onwards

(24) A transferor only in respect of a transfer of shares in the Trading Market under the Law Governing the Securities and Stock Exchange, (R.D. (No. 307) B.E. 2540 (1997)) and shall be effective from 13 August B.E. 2540 (1997) onwards

(25) The Financial Sector Restructuring Authority,

(R.D. (No. 323) B.E. 2541 (1998)) and shall be effective from 25 October B.E. 2540 (1998) onwards

(26) The Financial Assets Management Corporation,
(R.D. (No. 329) B.E. 2541(1998)) and shall be effective from 1 September B.E. 2541 (1998) onwards

(27) A person liable to duty under the stamp duty schedule for an instrument produced between an ad hoc juristic person and a juristic partnership or other juristic persons arising from transferring properties to securities under the rules, procedures and conditions prescribed by the Director-General,
(R.D. (No. 335) B.E. 2541(1998)) and shall be effective from 6 November B.E. 2541 (1998) onwards

(see also DG. N.-S.D. (No. 40) Notes Link)

(28) The property Fund, the Property Fund for Resolving Financial Institution Problems, and the Mutual Fund for Resolving Financial Institution Problems organized by the Securities Exchange Commission,
(R.D. (No. 338) B.E. 2541) and shall be effective from 12 November B.E. 2540 onwards
(Repealed (28) of Section 6 by R.D. (No. 610) B.E. 2559 (2016) and shall be enforced until 19 May B.E. 2560)

(29) The Secondary Mortgage Corporation,
(R.D. (No. 345) B.E. 2541 (1998)) and shall be effective from 2 February B.E. 2541 (1998) onwards

(30) The transferor, only in the case of transferring registered securities by a registrar who receives an approval from the Securities Exchange Commission,
(R.D. (No, 351) B.E. 2542(1999)) and shall be effective from 26 March B.E. 2542 (1999) onwards

(31) An operator who is a public company or a juristic company, where such operator has merged or transferred the whole business to one another under the rules, procedures, and conditions prescribed by the Director-General of Revenue,
(R.D. (No. 357) B.E.2542(1999)) and shall be effective from 2 August B.E. 2542 (1999) onwards

(see also DG. Re: Merger and entire business transfer Notes Link)

(see also DG. Re: Merger and entire business transfer (no. 2) Notes Link)

(see also DG. Re: Merger and entire business transfer (no. 3) Notes Link)

(32) A government enterprise only in the respect of an instrument made from transferring a portion of or the whole capital to shares of a juristic company or a public company limited under the law governing capital of a government enterprise, (R.D. (No. 372) B.E. 2543(2000)) and shall be effective from 30 October B.E. 2543 (2000) onwards

(33) An arbitration only in respect of a ruling letter of an arbitrator, (R.D. (No. 374) B.E. 2543 (2000)) and shall be effective from 16 November B.E. 2543 (2000) onwards

(33) The Community Organization Development Institute (Public Organization), (R.D. (No. 380) B.E. 2544(2001)) and shall be effective from 26 October B.E. 2543 (2000) onwards

"(34) The person who is obliged to pay duty specifically an instrument subject to payment of stamp duty in the securities purchase/sale business with a repurchase/resale contract, specifically in the part of the securities under the law governing securities and exchange, however, according to the bases, procedures and conditions prescribed by the Director-General of Revenue Department."

(R.D. (No. 393) B.E. 2544(2001)) and shall be effective from 27 December B.E. 2543 (2000) onwards

(see also DG. N.-S.D. (No. 42) Notes Link

"(35) Government Pension Fund under the law governing government pension fund, specifically an execution of instruments in lending money to its members as from 1st January 2002 onwards.

(36) Immovable Property and Rights of Claims Mutual Fund established under the law governing securities and exchange."

(R.D. (No. 398) B.E. 2545) and shall be effective from 31 January B.E. 2545 onwards

(Repealed (36) of Section 6 by R.D. (No. 610) B.E. 2559 (2016) and shall be enforced until 19 May B.E. 2560)

"(37) Seller, specifically the execution of instruments owing to the sale of the following immovable property:

(a) house, building, or other structure which is normally used for dwelling purposes;

(b) immovable property under (a) with land;

(c) residential condominium room in a condominium building under the law governing condominium building.

However specifically in the case of making contract of sale of immovable property where the transferor has used same as his/her major dwelling place, and with his/her name having been listed in the house register under the law governing citizen registration for a period of not less than one year from the date of acquirement of ownership or right of possession of such immovable property, whereby it shall be in accordance with the bases, procedures and conditions prescribed by the Director-General of Revenue Department.

For the exemption under paragraph one, it must be evidently clear that within one year before or from the date of making contract of sale of such immovable property the seller has made a new contract of sale of immovable property of the description under (a), (b) or (c) for use as his/her own dwelling place, and the exemption duly granted shall be equivalent to the stamp duty computed from the value of the said immovable property, but in no case shall it exceed the value of the new immovable property."

(R.D. (No. 444) B.E. 2548(2005)) and shall be effective from 30 November B.E. 2548 (2005) onwards

"(38) The Islamic Bank of Thailand, specifically transfer of ownership in immovable property to transferee owing to hire-purchase of the Islamic Bank of Thailand."

(R.D. (No. 446) B.E. 2548(2005)) and shall be effective from 31 December B.E. 2548 (2005) onwards

"(39) The Small and Medium Enterprises Development Bank of Thailand under the law governing Small and Medium Enterprises Development Bank of Thailand as from 20th December 2002 onwards."

(R.D. (No. 450) B.E. 2549(2006)) and shall be effective from 24 January B.E. 2549 (2006) onwards

"(40) Deposit Protection Agency under the law governing Deposit Protection Agency, however, as from 11th August 2008 onwards."

(R.D. (No. 491) B.E. 2552(2009)) and shall be effective from 9 September B.E. 2552 (2009) onwards

"(41) Public Debt Restructuring and Domestic Bond Market Development Fund under the law governing public debt management."

(R.D. (No. 512) B.E. 2554(2010)) and shall be effective from 17 February B.E. 2554 (2010) onwards

“(42) National Savings Fund under the law governing National Savings Fund, however, as from 12th May 2011 onwards.”

(42) (R.D. (No. 606) B.E. 2559 (2016)) and shall be effective from 30 April B.E. 2559 (2016) onwards

Section 7 and 8 (Obsolete since the enactment of R.C.A.A. No. 18 B.E. 2504 S.13)

Section 9 The Minister of Finance shall have the care and charge of this Royal Decree.

Countersigned by
Field Marshall P. Pibulsonggram
Prime-Minister