

CLIENT UPDATE 2015 JUNE

TAXATION

Tax Authority Appeals for Tax Debt Settlement

On 02 June 2015, the General Department of Taxation (the "**GDT**") issued Notification No. 3435 GDT (the "**Notification**"), in order to invite companies to settle their tax debts.

The end of June 2015 has been set as the deadline that all companies owing state tax must settle their debts. Failure to settle the tax debt within this deadline means that the GDT could publish the names of the companies and their proprietors in the newspapers. Other stringent measures that the GDT would take against tax debtors include demanding for tax debts as provided for in the taxation regulations, ceasing import-export, freezing bank accounts and nullifying other permits and licenses.

Strengthening tax collection in order to increase state revenue is part of the series of reforms the GDT has laid down as the ASEAN Economic Community 2015 deadline looms near. The historical perception that Cambodia is a country lax in tax regulation, enforcement and collection no longer holds true, as the GDT increases its regulatory grip. To the best of our knowledge. 78 working groups have been created inside the GDT as part of this tax reform effort.

The GDT asserted its position that this tax reform would make Cambodia a level playing field by making tax compliance a legal obligation for all businesses.



CLIENT UPDATE 2015 JUNE

Contacts



Managing Partner

D (855) 23 963 112 / 113

F (855) 23 963 116

heng.chhay@rajahtann.com

Heng Chhay



Hout Sotheary
Partner

D (855) 963 112 / 113
F (855) 963 116
hout.sotheary@rajahtann.com

Our regional presence



Our regional contacts

RAJAH & TANN | Singapore

Rajah & Tann Singapore LLP

9 Battery Road #25-01 Straits Trading Building Singapore 049910 T +65 6535 3600 F +65 6225 9630 sg.rajahtannasia.com

R&T SOK & HENG Cambodia

R&T Sok & Heng Law Office

Vattanac Capital Office Tower, Level 17, No. 66 Preah Monivong Boulevard, Sangkat Wat Phnom Khan Daun Penh, 12202 Phnom Penh, Cambodia T +855 23 963 112 / 113 F +855 963 116 kh.rajahtannasia.com

*in association with Rajah & Tann Singapore LLP

RAJAH & TANN REPRESENTATIVE OFFICE | China

Rajah & Tann Singapore LLP Shanghai Representative Office

Unit 1905-1906, Shui On Plaza, 333 Huai Hai Middle Road Shanghai 200021, People's Republic of China T +86 21 6120 8818 F +86 21 6120 8820 cn.rajahtannasia.com

RAJAH & TANN NK LEGAL Myanmar

Rajah & Tann NK Legal Myanmar Company Limited

Office Suite 007, Inya Lake Hotel No. 37, Kaba Aye Pagoda Road, Mayangone Township, Yangon, Myanmar T +95 9 73040763 / +95 1 657902 / +95 1 657903 F +95 1 9665537 mm.rajahtannasia.com



ASSEGAF HAMZAH & PARTNERS Indonesia

Assegaf Hamzah & Partners

Menara Rajawali 16th Floor Jalan DR. Ide Anak Agung Gde Agung Lot #5.1 Kawasan Mega Kuningan, Jakarta 12950, Indonesia T +62 21 2555 7800 F +62 21 2555 7899 www.ahp.co.id

* Assegaf Hamzah & Partners is an independent law firm in Indonesia and a member of the Rajah & Tann Asia network.

RAJAH & TANN | Lao PDR

Rajah & Tann (Laos) Sole Co., Ltd.

Phonexay Village, 23 Singha Road, House Number 046/2 Unit 4, Saysettha District, Vientiane Capital, Lao PDR T +856 21 454 239 F +856 21 285 261 la.rajahtannasia.com

CHRISTOPHER & LEE ONG | Malaysia

Christopher & Lee Ong

Level 22, Axiata Tower, No. 9 Jalan Stesen Sentral 5, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia T +60 3 2273 1919 F +60 3 2273 8310 www.christopherleeong.com *in association with Rajah & Tann Singapore LLP

RAJAH & TANN Thailand

Rajah & Tann (Thailand) Limited

973 President Tower, 12th Floor, Units 12A-12F Ploenchit Road, Lumpini, Pathumwan Bangkok 10330, Thailand T +66 2 656 1991 F +66 2 656 0833 th.rajahtannasia.com

RAJAH & TANN LCT LAWYERS Vietnam

Rajah & Tann LCT Lawyers

Ho Chi Minh City Office Saigon Centre, Level 13, Unit 2&3 65 Le Loi Boulevard, District 1, HCMC, Vietnam $T \; +84\; 8\; 3821\; 2382\; /\; +84\; 8\; 3821\; 2673 \quad F \; \; +84\; 8\; 3520\; 8206$

Hanoi Office Lotte Center Hanoi - East Tower, Level 30, Unit 3003, 54 Lieu Giai St., Ba Dinh Dist., Hanoi, Vietnam T+84 4 3267 6127 F+84 4 3267 6128 www.rajahtannlct.com

R&T Sok & Heng Law Office provides top quality and incisive legal services to domestic and international clients; in local and crossborder transactions; on day-to-day operations and the most challenging transactions. As one of the leading law firms in Cambodia, R&T Sok & Heng Law Office helps clients achieve their goals by combining international standard with local expertise.

R&T Sok & Heng Law Office is part of Rajah & Tann Asia, a network of local law firms in Singapore, China, Lao PDR, Vietnam, Thailand and Myanmar, as well as associate and affiliate offices in Malaysia, Cambodia, Indonesia and the Middle East. Our Asian network also includes regional desks focused on Japan and South Asia.

The contents of this Update are owned by R&T Sok & Heng Law Office and subject to copyright protection under the laws of Cambodia and, through international treaties, other countries. No part of this Update may be reproduced, licensed, sold, published, transmitted, modified, adapted, publicly displayed, broadcast (including storage in any medium by electronic means whether or not transiently for any purpose save as permitted herein) without the prior written permission of R&T Sok & Heng Law Office.

Please note also that whilst the information in this Update is correct to the best of our knowledge and belief at the time of writing, it is only intended to provide a general guide to the subject matter and should not be treated as a substitute for specific professional advice for any particular course of action as such information may not suit your specific business and operational requirements. It is to your advantage to seek legal advice for your specific situation. In this regard, you may call the lawyer you normally deal with in R&T Sok & Heng Law Office.