

TAX AUDITS FOR VAT REVERSE CHARGE ON E-GOODS, SERVICES AND IT

📍 BREAKFAST BRIEFING
@ VDB LOI CAMBODIA

📅 9 February 2024



INTRODUCTION

Since April 2022, born from the COVID boom of online business, a new and costly tax system was created in Cambodia to hit a very wide range of cross border transactions. Although taxpayers are supposed to implement this already for nearly 2 years, misunderstandings about the scope of the VAT Reverse Charge are widespread. We notice in practice that only few taxpayers correctly assess which transactions are included in Cambodia's newest VAT impost. Online obtained services virtually all trigger VAT Reverse Charge. So is, in many circumstances, obtaining advice from overseas, advertising, data storage, and so on.

In this uniquely practical briefing, we focus on the actual tax audit by tax officials on this VAT Reverse Charge and Withholding tax related to e-commerce transactions. What have tax officials been asking and claiming? How have the rules been applied in reality? And, what can you do to avoid tax reassessments and resolve disputes?

SPEAKERS



Edwin Vanderbruggen
Senior Partner

Edwin has 30 years of experience as a tax consultant and spent several years as a fulltime internal adviser with the tax authorities in Cambodia. He is recognized for his experience and knowledge in strategic transfer pricing matters, such as high-stakes disputes and transfer pricing planning, and he leads a team of experienced tax advisers in Cambodia on transfer pricing compliance projects. Edwin has trained tax authorities in Thailand, Myanmar, and Cambodia on transfer pricing issues, and published several professional textbooks on transfer pricing. Edwin and his team assist banks, oil and gas companies, telecoms, and other multinationals with their transfer pricing needs in Cambodia.



Laysym Sim
Partner

Laysym is an experienced tax adviser with a degree in management. He has over 19 years of work experience, including with KPMG and DFDL in Cambodia, where he was responsible for relations with the tax authorities. He advises on transfer pricing, tax planning, and tax disputes. Laysym has conducted tax due diligence on several major acquisitions in Cambodia, and worked with a wide variety of international clients across a broad range of industries.

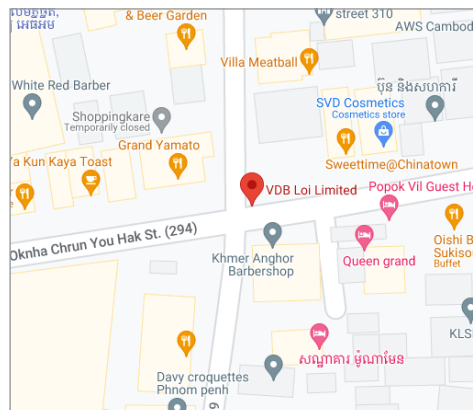
HIGHLIGHTS

- Tax audit experiences on VAT Reverse Charge and WHT
- Which non-IT services has the GDT sometimes reassessed with VAT Reverse Charge?
- Cross border services, software and IT: what has been the experience in actual GDT audits?
- How to make sure the VAT Reverse Charge becomes an input credit?
- Are there any successful defenses against VAT Reverse Charge?
- How to apply Withholding Tax, DTA and VAT on cross-border services and royalties
- Special VAT concerns for banks and MFI
- Are there steps you can take so that VAT Reverse Charge does not apply?

PROGRAM (DRAFT)

TIME	PROGRAM
09:00AM - 09:20AM	WHICH TRANSACTIONS ARE IMPACTED BY VAT REVERSE CHARGE?
09:20AM - 09:40AM	REAL TAX AUDIT EXPERIENCES ON VAT AND WHT : INFORMATION TECHNOLOGY, SOFTWARE, CONSULTING SERVICES, DATABASE ACCESS, B2B GOODS ONLINE ORDERING, GROUP SUPPORT SERVICES, ETC.,
09:40AM - 09:55AM	INVOICING, INPUT CREDITS, TIME OF SUPPLY AND OTHER PRACTICAL ISSUES
09:55AM	Q&A

EVENT LOCATION (SUBJECT TO CHANGE)



VDB LOI OFFICE CAMBODIA
No. 33, Street 294 (corner of
Street 29)
Sangkat Tonle Bassac
Khan Chamkarmorn
Phnom Penh 120101

HOW TO REGISTER AND ATTEND?

Registration is free of charge for VDB Loi clients and invitees. Send your info (Name, Position, Company, Email, Contact Number) to Kathryn Ortega (kathryn.ortega@vdb-loi.com) or scan QR Code for online registration.

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