



Saravut Krailadsiri

Partner

Co-head of Tax and Corporate Restructuring Practice

T: +66 2 838 1750 ext. 1780

E: saravut.k@kap.co.th

Languages

- Thai
- English

Education and Admission

- LL.M, Private Law, Thammasat University
- LL.B, Thammasat University
- Extra-ordinary Member of the Thai Bar Association
- Member of the Lawyers Council of Thailand

www.kudunandpartners.com

Kudun and Partners
23rd Floor, Unit C and F,
Gaysorn Tower
127 Ratchadamri Road,
Lumpini, Pathumwan
Bangkok, 10330, Thailand

Practice Description

Saravut's principal focus for the past two decades is on tax, corporate restructuring and cross border M&A. He is an esteemed legal expert in the oil and gas industry having represented both Thai and multinational companies investing in petroleum exploration and production in Thailand on legal and tax matters related to petroleum laws, petroleum income tax and other laws related to the transfer of participating interest in petroleum concessions and operation of petroleum activities in Thailand.

Apart from oil and gas, Saravut has extensive experience in real estate, technology start-ups and the e-commerce industries. He provides legal and tax counsel including risk management advice for the restructuring and entire business transfer of groups of companies as well as providing tax management and planning advice on setting up proper entities for investment and development projects in ASEAN countries. He also advises property developers on a spectrum of tax structures for real estate acquisitions including income tax, withholding tax, VAT, SBT, stamp duties through to house and land tax.

Areas of Expertise

- Corporate and M&A, including acquisition and disposal of equity interest in listed companies
- Corporate restructuring
- Oil and gas
- Tax
- Transfer pricing

Professional Experience

- Senior Associate, Hunton Andrews Kurth Company Limited
- Tax Manager, PTT Exploration and Production, PLC
- Associate, Baker & McKenzie
- Manager, Hongsa Power Project, Banpu PLC
- Associate, Baker & McKenzie
- Office of the Ombudsman

Awards and Recognitions

- Recommended Lawyer in Tax by The Legal 500 Asia Pacific 2020

Practice Focus

Saravut's recent taxation and restructuring experience extend across several practice areas including Corporate M&A, Capital markets, IPOs for various industries, which include:

Taxation and Corporate Restructuring

- Advising and representing multinational companies in tax dispute matters regarding transfer pricing, withholding tax and VAT, including defending a case against the Thai Revenue Department.
- Representing PTT Public Company Limited regarding the tax planning structure in a merger between its subsidiaries.
- Acting as legal and tax counsel in connection with corporate restructuring and providing tax management and planning for an initial public offering with an approximate value of THB 23.7 billion (USD 758.6 million).
- Acting as legal and tax counsel in connection with corporate restructuring and providing tax management and planning on setting up a proper entity for development projects in ASEAN Countries.
- Acting as legal and tax counsel in connection with the corporate restructuring and tax planning for an initial public offering with an estimated total value of THB 2.3 billion (USD 73.6 million).
- Acting as a legal and tax counsel in connection with the establishment of international headquarters for multiple power-related businesses for their tax management purposes.
- Acting as a legal and tax counsel for a multinational company in connection with the establishment of an entire business transfer of its subsidiaries doing solar business.

Corporate, Mergers and Acquisitions and Joint Ventures

- Conducting legal and tax due diligence and addressing relevant key legal and tax issues concerning multiple merger and acquisition transactions.
- Providing advice on legal and tax implications of the acquisition of shares of a major logistics company by way of the entire business transfer (EBT) arrangement.

Speaking Engagements

- Author of "Thailand issues regulation on stamp duty payment for electronic documents", International Tax Review (ITR).

Publications and Presentations

- Speaker on "Cross Border Investment Activities Between Countries" ALB Thailand In-house Legal Summit 2019.

Awards and Recognitions

- Recommended Lawyer in Tax by The Legal 500 Asia Pacific 2020