

September 13, 2023

Dear Valued Customer,

Effective December 1st, 2023, Federal Express (Thailand) Limited will be the main operating entity for FedEx and TNT shipments. We hereby list out the withholding tax and Value-added tax treatments for your reference.

Withholding Tax (WHT) treatment

For tax invoices issued by Federal Express (Thailand) Limited for international shipments <u>outbound</u> from Thailand or domestic shipments in Thailand, you will need to withhold the following¹:

- 1% of transportation freight and related charges;
- 3% of other service fees.

For tax invoices issued by Federal Express (Thailand) Limited for shipments <u>inbound</u> to Thailand, you will need to withhold 3% on certain service fees.

No withholding tax is required in relation to notices/ receipts issued to customers under the title of "Collect on behalf of: FedEx group and its affiliates outside of Thailand".

For details of WHT rates, please refer to $\underline{\mathbf{Appendix}} \ \mathbf{A}$ for FedEx shipments and $\underline{\mathbf{Appendix}} \ \mathbf{B}$ for TNT shipments.

The above tax treatments only applicable to customers that are companies, registered partnerships or other entities in Thailand. Not applicable to individual customers in Thailand and customer outside of Thailand.

WHT Certificate

For tax invoices issued by Federal Express (Thailand) Limited after December 1, 2023, please issue the withholding tax certificates to Federal Express (Thailand) Limited. For tax invoices issued by FedEx Express International (Thailand) Limited / TNT Express Worldwide (Thailand) Co., Ltd before December 1, 2023, Please issue withholding tax certificates to FedEx Express International (Thailand) Limited / TNT Express Worldwide (Thailand) Co., Ltd respectively.

WHT certificate for FedEx and TNT shall be sent separately through provided envelope. Please send the WHT certificate to FedEx/ TNT Head Office to the following addresses. For

¹ For customers who are using e-withholding tax system, the withholding tax rate shall be reduced to 1 percent for service fees paid from 1 Jan 2023 to 31 Dec 2025, pursuant to Ministerial Regulation No. 389 (B.E. 2566).

TNT shipment, the envelope will indicate as "This envelope is for sending back withholding tax certificate(s) of your TNT transacted services"

Address for sending back WHT certificate			
FedEx shipments	TNT shipments		
P.O. Box 9, Monterey Tower Post Office	P.O. Box 1064, New Petchburi Post Office		
Bangkok 10323	Bangkok 10311		

VAT treatment

With effective from December 1st, 2023, please find below the VAT treatments for the following services:

- International air transportation: 0% VAT;
- International land transportation: VAT exempt;
- Domestic transportation: VAT exempt;
- Custom clearance service or other service fee: 7% VAT;
- Duty and tax reimbursement: not subject to VAT.

For details of VAT treatment, please refer to $\underline{\mathbf{Appendix}} \ \mathbf{C}$ for FedEx shipment and $\underline{\mathbf{Appendix}} \ \mathbf{D}$ for TNT shipments.

Appendix A

Please refer to table below for the WHT treatments for invoices issued by Federal Express (Thailand) Limited for FedEx shipments.

Withholding Tax Treatments for customers not using e Withholding Tax System ²				
International Transportation				
Service Charges	Outbound	Outbound Shipment		
Service Charges	Int'l air	Int'l land	Inbound Shipment ³	
	transportation	transportation	-	
Freight Charge	1%	1%	Not subject to WHT	
Additional Freight Charge - Fuel Surcharge	1%	1%	Not subject to WHT	
Additional Freight Charge –Address Correction	1%	1%	Not subject to WHT	
Third Party Billing Surcharge	3%	3%	Not subject to WHT	
Additional Freight Charge –	1%	1%	Not subject to WHT	
Third Party Consignee Surcharge	170	1 70	Not subject to Will	
FedEx International Broker Select	3%	3%	Not subject to WHT	
Additional Freight Charge - Saturday Pick Up	1%	1%	Not subject to WHT	
Additional Freight Charge - Saturday Delivery	1%	1%	Not subject to WHT	
Additional Freight Charge - Out of Pickup Area				
Surcharge (OPA) / Out of Delivery Area	1%	1%	Not subject to WHT	
Surcharge (ODA)				
Additional Freight Charge - Indirect Signature				
Required (ISR) / Direct Signature Required	1%	1%	Not subject to WHT	
(DSR) /Adult Signature Required (ASR)				
Additional Freight Charge - Residential	1%	1%	Not subject to WHT	
Delivery Surcharge	1 70	1 70	Not subject to Will	
Accessible Dangerous Goods /	3%	3%	Not subject to WHT	
Inaccessible Dangerous Goods	370	370	- Not subject to Will	
Additional Freight Charge - Additional				
Handling Surcharge -Dimension / Additional	1%	1%	Not subject to WHT	
Handling Surcharge - Freight /Oversize Charge				
Additional Freight Charge –	1%	1%	Not subject to WHT	
Non-Stackable Surcharge	170	1 70	Not subject to Will	
Dry Ice / Gel Packing Surcharge	3%	3%	Not subject to WHT	
Duty Handling Fee			3%	
Customs Clearance Surcharge	3%	3%	3%	
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² For customers who are using e-withholding tax system, the withholding tax rate shall be reduced to 1 percent for service fees paid from 1 Jan 2023 to 31 Dec 2025, pursuant to Ministerial Regulation No. 389 (B.E. 2566).

³ No WHT in relation to notices/ receipts issued to customers under the title of "Collect on behalf of: FedEx group and its affiliates outside of Thailand" for inbound shipments.

Non-Document Supply	3%	3%	Not subject to WHT
Customs Overtime and Storage Fee Reimbursement (i.e., invoices are issued by the vendors to the name of customers)	Not subject to WHT		Not subject to WHT
Duty and Tax Reimbursement (i.e., invoices are issued by the vendors to the name of customers)	Not subject to WHT		Not subject to WHT
FedEx Priority Alert / FedEx Priority Alert Plus	3%	3%	Not subject to WHT
FedEx OnDemand Care	3%	3%	Not subject to WHT
Additional freight charge – Express On-Call Pickup	1%	1%	Not subject to WHT

Appendix B

Please refer to table below for the WHT treatments for invoices issued by Federal Express (Thailand) Limited for <u>TNT shipments.</u>

Withholding Tax Treatments for customers not using e-Withholding Tax System⁴				
	International Transportation			
Service Charges	Outbound	Outbound Shipment		Domestic
	Int'l air	Int'l land	Inbound Shipment⁵	Transportation
	transportation	transportation		
Freight Charge	1%	1%		1%
Additional freight charge -	10/			40/
Fuel Surcharge	1%	1%		1%
Additional freight charge -	1%	1%		
Enhanced Security	1 70	1 70		_
Additional freight charge -	1%	1%		1%
Priority	1 70	1 70		1 70
Additional freight charge -	1%	1%		1%
Remote Area Service	1 70			
Additional freight charge -	1%	1%		-
Resolved Wrong Address	170	1 70	Not subject	
Additional freight charge -	1%	1%	to WHT	_
Non Conveyable	. 70	1 70		
Additional freight charge -	1%	1%		_
Exceeding Dimensions	1 70	170		
Additional freight charge -	1%	1% 1%		_
Non Stackable	. 70	1 70		
Enhanced Liability	3%	3%		3%
Additional freight charge -				
Non-Electronic	1%	1%		1%
Consignment				
Proof of delivery	3%	3%		3%

⁴ For customers who are using e-withholding tax system, the withholding tax rate shall be reduced to 1 percent for service fees paid from 1 Jan 2023 to 31 Dec 2025, pursuant to Ministerial Regulation No. 389 (B.E. 2566).

⁵ No WHT in relation to notices/ receipts issued to customers under the title of "Collect on behalf of: FedEx group and its affiliates outside of Thailand" for inbound shipments.

Appendix CPlease refer to table below for the VAT treatments forinvoices issued by <u>Federal Express</u> (<u>Thailand</u>) <u>Limited for FedEx shipments</u>.

Value-added Tax Treatments				
	International Transportation			
Service Charges	Outbound	1		
	Int'l air	Int'l land	Inbound Shipment ⁶	
	transportation	transportation	Simplificate	
Freight Charge	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge – Fuel Surcharge	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge – Address Correction	0 %	VAT Exempt	Not subject to VAT	
Third Party Billing Surcharge	7%	7%	Not subject to VAT	
Additional Freight Charge – Third Party Consignee Surcharge	0 %	VAT Exempt	Not subject to VAT	
FedEx International Broker Select	7%	7%	Not subject to VAT	
Additional Freight Charge – Saturday Pick Up	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge – Saturday Delivery	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge - Out of Pickup Area Surcharge (OPA) / Out of Delivery Area Surcharge (ODA)	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge - Indirect Signature Required (ISR) / Direct Signature Required (DSR) /Adult Signature Required (ASR)	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge - Residential Delivery Surcharge	0 %	VAT Exempt	Not subject to VAT	
Accessible Dangerous Goods / Inaccessible Dangerous Goods	7%	7%	Not subject to VAT	
Additional Freight Charge - Additional Handling Surcharge - Dimension / Additional Handling Surcharge - Freight / Oversize Charge	0 %	VAT Exempt	Not subject to VAT	
Additional Freight Charge – Non-Stackable Surcharge	0 %	VAT Exempt	Not subject to VAT	
Dry Ice / Gel Packing Surcharge	7%	7%	Not subject to VAT	

 $^{^6}$ No VAT in relation to notices/ receipts issued to customers under the title of "Collect on behalf of: FedEx group and its affiliates outside of Thailand" for inbound shipments.

Duty Handling Fee	-	7%	
Customs Clearance Surcharge	7%	7%	7%
Declared Value Charge for Carriage	7%	7%	Not subject to VAT
Non-Document Supply	7% 7%		Not subject to VAT
Customs Overtime and Storage Fee Reimbursement (i.e., invoices are issued by the vendors to the name of customers)	Not subject to VAT		Not subject to VAT
Duty and Tax Reimbursement (i.e., invoices are issued by the vendors to the name of customers)	Not subject to VAT		Not subject to VAT
FedEx Priority Alert / FedEx Priority Alert Plus	7%	7%	Not subject to VAT
FedEx OnDemand Care	7%	7%	Not subject to VAT
Additional freight charge – Express On-Call Pickup	0 %	VAT Exempt	Not subject to VAT

Appendix D

Please refer to table below for the VAT treatments for invoices issued by <u>Federal Express</u> (<u>Thailand</u>) <u>Limited for TNT shipments.</u>

Value-added Tax Treatment ⁷					
International Transportation					
Service Charges	Outbound Shipment		Inbound	Domestic	
	Int'l air	Int'l land	Shipment ⁸	Transportation	
	transportation	transportation	Simplificate		
Freight Charge	0%	VAT Exempt		VAT Exempt	
Additional freight charge -	0%	VAT Evennt		\/AT [
Fuel Surcharge	0%	VAT Exempt		VAT Exempt	
Additional freight charge -	0%	VAT Exempt			
Enhanced Security	070	VATEXEMPL		_	
Additional freight charge -	0%	VAT Exempt		VAT Exempt	
Priority	0 70	0% VAT Exempt		VATEXEMPL	
Additional freight charge -	0%	VAT Exempt		VAT Exempt	
Remote Area Service		var Exempt		VATEXCHIPE	
Additional freight charge -	0%	VAT Exempt		_	
Resolved Wrong Address	0 70				
Additional freight charge –	0%	VAT Exempt	Not subject	_	
Non Conveyable	0 70	VATEXCHIPE	to VAT		
Additional freight charge -	0%	VAT Exempt		_	
Exceeding Dimensions	0 70	V/ C/ Z/C/IIPC			
Additional freight charge –	0%	VAT Exempt		_	
Non Stackable	0 70				
Enhanced Liability	7%	7%		7%	
Additional freight charge -					
Non-Electronic	0%	VAT Exempt		VAT Exempt	
Consignment					
Proof of delivery	7%	7%		7%	

⁷ The tax treatments are applicable to TNT shipments picked up on or after December 1st, 2023.

⁸ No VAT in relation to notices/ receipts issued to customers under the title of "Collect on behalf of: FedEx group and its affiliates outside of Thailand" for inbound shipments.