

PANORAMIC

**ANTI-BRIBERY &
CORRUPTION**

Thailand



LEXOLOGY

Anti-Bribery & Corruption

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Contents

Anti-Bribery & Corruption

RELEVANT INTERNATIONAL AND DOMESTIC LAW

- International anti-corruption conventions
- Foreign and domestic bribery laws
- Successor liability
- Civil and criminal enforcement
- Out-of-court disposal and leniency

FOREIGN BRIBERY

- Legal framework
- Definition of a foreign public official
- Gifts, travel and entertainment
- Facilitating payments
- Payments through intermediaries or third parties
- Individual and corporate liability
- Private commercial bribery
- Defences
- Agency enforcement
- Patterns in enforcement
- Prosecution of foreign companies
- Sanctions
- Recent decisions and investigations

FINANCIAL RECORD-KEEPING AND REPORTING

- Laws and regulations
- Disclosure of violations or irregularities
- Prosecution under financial record-keeping legislation
- Sanctions for accounting violations
- Tax-deductibility of domestic or foreign bribes

DOMESTIC BRIBERY

- Legal framework
- Scope of prohibitions
- Definition of a domestic public official
- Gifts, travel and entertainment
- Facilitating payments
- Public official participation in commercial activities
- Payments through intermediaries or third parties
- Individual and corporate liability
- Private commercial bribery
- Defences

Agency enforcement
Patterns in enforcement
Prosecution of foreign companies
Sanctions
Recent decisions and investigations

UPDATE AND TRENDS

Key developments of the past year

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Thailand

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RELEVANT INTERNATIONAL AND DOMESTIC LAW

International anti-corruption conventions

To which international anti-corruption conventions is your jurisdiction a signatory?

Thailand is a signatory to the United Nations Convention against Corruption. Thailand signed the Convention on 9 December 2003 and ratified it on 1 March 2011. However, Thailand has not yet ratified the Organisation for Economic Co-operation and Development Anti-Bribery Convention, an international agreement that criminalises bribery of foreign public officials. Nevertheless, Thailand is currently in the process of becoming an official member and is now an 'Accession Candidate Country'.

Law stated - 4 December 2025

Foreign and domestic bribery laws

Identify and describe your national laws and regulations prohibiting bribery of foreign public officials (foreign bribery laws) and domestic public officials (domestic bribery laws).

Thailand has the Organic Act on Anti-Corruption B.E. 2561 (2018), also known as the Act Supplementing the Constitution Relating to the Prevention and Suppression of Corruption (the Anti-Corruption Act), which prohibits bribery of both foreign public officials and domestic public officials. Sections 173 to 177 impose sanctions on offenders who are foreign public officials or officials of an international organisation. Certain provisions in the Thai Penal Code also impose criminal liability for the bribery of domestic public officials.

Law stated - 4 December 2025

Successor liability

Can a successor entity be held liable for violations of foreign and domestic bribery laws by the target entity that occurred prior to the merger or acquisition?

Since liability is tied to the existence of the juristic person, if the successor entity ceases to exist after a merger or acquisition, it is not subject to criminal liability for bribery.

Law stated - 4 December 2025

Civil and criminal enforcement

Is there civil and criminal enforcement of your jurisdiction's foreign and domestic bribery laws?

Thailand enforces foreign and domestic bribery laws through criminal mechanisms, primarily under the Anti-Corruption Act and the Thai Penal Code. Civil enforcement can result in administrative sanctions such as blacklisting companies from government contracts.

Law stated - 4 December 2025

Out-of-court disposal and leniency

Can enforcement matters involving foreign or domestic bribery be resolved through plea agreements, settlement agreements, prosecutorial discretion or similar means without a trial? Is there a mechanism for companies to disclose violations of domestic and foreign bribery laws in exchange for lesser penalties?

In Thailand, plea bargaining is not permitted. Therefore, enforcement involving foreign or domestic bribery in Thailand must proceed through normal legal proceedings without contractual agreements on enforcement outcomes.

Notwithstanding the above, section 135 of the Anti-Corruption Act states that a person involved in an offence who provides testimony, leads or significant information that serves as key evidence may be granted witness protection and exempted from prosecution.

In addition, under Thai criminal law, if the accused pleads guilty before the court, the court may consider imposing less criminal liability, such as reduced terms of imprisonment, suspended sentences or reduced fines. That said, this is subject to the court's discretion and not via contractual plea bargaining.

Law stated - 4 December 2025

FOREIGN BRIBERY

Legal framework

Describe the elements of the law prohibiting bribery of a foreign public official in your jurisdiction.

Thailand imposes liability for failing to prevent bribery of foreign public officials. Under the Organic Act on Anti-Corruption B.E. 2561 (2018), also known as the Act Supplementing the Constitution Relating to the Prevention and Suppression of Corruption (the Anti-Corruption Act), if the offender is a person associated with a juristic entity and the action was taken for the benefit of such a juristic person, the juristic entity can be held liable for bribery offences, including the bribery of foreign public officials.

The Anti-Corruption Act also imposes liability on a juristic entity for not having appropriate measures in place to prevent bribery of a foreign or domestic public official. Such liability may be a fine of one to two times the damage caused or benefits received by the entity.

Law stated - 4 December 2025

Legal framework

What legislation, if any, exists in your jurisdiction to prohibit foreign public officials from soliciting bribes?

In Thailand, the Organic Act on Anti-corruption B.E.2561 (2018), commonly referred to as the Anti-Corruption Act, stipulates under section 176 that it is prohibited for any person to give, offer or promise money, property or any other benefit to a public official, including a foreign official or an official of an international organisation with the intent to induce that person to act improperly, refrain from acting or delay the performance of their official duties.

Law stated - 4 December 2025

Definition of a foreign public official

How does the law define a foreign public official, and does that definition include employees of state-owned or state-controlled companies?

The Anti-Corruption Act defines a foreign public official as any person holding a legislative, executive, administrative or judicial office of a foreign country, and any person performing duties for a foreign country, including for a public agency or public enterprise, whether appointed or elected, permanent or temporary, and whether or not receiving salary or other remuneration. This definition includes employees of state-owned or state-controlled companies, as these entities are considered public enterprises.

Law stated - 4 December 2025

Gifts, travel and entertainment

To what extent do anti-bribery laws in your jurisdiction restrict providing foreign officials with gifts, travel expenses, meals or entertainment?

The Anti-Corruption Act imposes strict restrictions on providing gifts, travel expenses, meals or entertainment to foreign public officials. The Act includes the following provisions:

- Gifts: Offering gifts to foreign public officials is generally prohibited unless they are given under traditional customs and do not exceed a value of 3,000 baht (according to Thai law). For assets or benefits exceeding 3,000 baht that an official must accept to maintain friendship or good relations with the giver, approval from a supervisor is required.
- Travel expenses: Travel expenses must be justified as necessary for legitimate business purposes.
- Meals and entertainment: Offering meals or entertainment must be reasonable and directly related to legitimate business activities.

In addition, government agencies in Thailand have implemented internal policies and measures to align with the Organic Act on Anti-Corruption B.E.2561 (2018). For example, the Department of Provincial Administration issued an Anti-Bribery Policy and a 'No Gift Policy' for official duties for 2025.

Law stated - 4 December 2025

Facilitating payments

Do the laws and regulations in your jurisdiction permit facilitating or 'grease' payments to foreign officials?

No, the Anti-Corruption Act does not permit facilitation or 'grease' payments to foreign officials. The Act strictly prohibits any form of bribery, including small payments made to expedite routine governmental actions. This aligns with most international anti-corruption standards, such as those set by the United Nations Convention against Corruption, to which Thailand is a signatory.

Law stated - 4 December 2025

Payments through intermediaries or third parties

In what circumstances do the laws prohibit payments through intermediaries or third parties to foreign public officials?

Section 175 of the Anti-Corruption Act prohibits any person from requesting, accepting or agreeing to accept any assets or other benefits for himself or herself or another person, as intermediaries or third parties, as a reward in inducing or having induced foreign public officials in any situation where the intermediaries are intended to influence the official to perform or omit or delay to perform the duty that benefits or inflicts detriment on any person or is an improper action. This includes direct, indirect (such as payment to third parties, family members or associates of foreign public officials) and facilitation payments. Even small payments intended to expedite routine governmental actions are prohibited if made through intermediaries.

Law stated - 4 December 2025

Individual and corporate liability

Can both individuals and companies be held liable for bribery of a foreign official?

Yes, under the Anti-Corruption Act, both individuals and companies can be held liable for bribery of a foreign official. The Act specifies that any person, including individuals and legal entities (such as companies), who gives, offers or promises to give any property or benefit to a foreign public official with the intent to induce them to perform or refrain from performing any duty improperly can be held liable.

Law stated - 4 December 2025

Private commercial bribery

To what extent do your jurisdiction's foreign anti-bribery laws also prohibit private commercial bribery?

The Anti-Corruption Act primarily focuses on public sector corruption, including bribery involving public officials. It does not explicitly address private commercial bribery. Instead, private sector bribery is generally governed by the Thai Penal Code, which prohibits giving, offering or agreeing to give any property or benefit to induce someone to perform or refrain from performing any act contrary to their duty.

While the Anti-Corruption Act does not directly cover private commercial bribery, it emphasises the importance of ethical conduct and transparency in all sectors. Companies are encouraged to implement robust internal controls and compliance measures to prevent any form of bribery, including in private commercial transactions. Some companies may have internal work rules prohibiting private commercial bribery.

Law stated - 4 December 2025

Defences

What defences and exemptions are available to those accused of foreign bribery violations?

Under the Anti-Corruption Act, defences and exemptions available to those accused of foreign bribery violations are as follows:

- Adequate procedures defence: Companies can defend themselves by demonstrating that they have appropriate measures to prevent bribery. This includes having robust compliance programmes, internal controls and training for employees.
- Lack of intent: An individual or entity can argue that there was no intent to bribe a foreign public official. This defence requires proving that the payment or benefit was not intended to influence the official's actions improperly.
- Legitimate business purpose: Payments or benefits provided for legitimate business purposes, such as reasonable travel expenses or promotional activities, may be exempt if they are not intended to influence the official's actions improperly.
- Customary gifts: Small, customary gifts given in accordance with local traditions and not intended to influence the official's actions improperly may be exempt. These gifts must be of nominal value and given transparently.

Law stated - 4 December 2025

Agency enforcement

Which government agencies enforce the foreign bribery laws and regulations?

In Thailand, the enforcement of foreign bribery laws and regulations is handled by the following government agencies:

- The National Anti-Corruption Commission (NACC): The NACC is responsible for investigating and prosecuting corruption cases, including those involving foreign bribery. It has the authority to take legal action against individuals and entities involved in corrupt practices.

- The Royal Thai Police: The police force assists in the investigation and enforcement of anti-corruption laws, including cases of foreign bribery.
- The Department of Special Investigation (DSI): The DSI often handles high-profile or politically sensitive bribery cases.
- The Office of the Attorney General (OAG): The OAG works in conjunction with the NACC to prosecute corruption cases. It plays a crucial role in the legal proceedings against those accused of foreign bribery.
- The Criminal Court for Corruption and Misconduct Cases: A competent court handles cases relating to bribery.

Law stated - 4 December 2025

Patterns in enforcement

Describe any recent shifts in the patterns of enforcement of the foreign bribery rules.

Recent shifts in the enforcement of foreign bribery rules in Thailand have focused on aligning the country's legal framework with international anti-corruption standards. Key developments include the following:

- Expanded scope: Recent amendments to existing legislation have expanded the scope of Thai anti-corruption laws to cover private bribery involving state officials, foreign state officials and international organisation officials.
- Increased prosecutions: There has been a noticeable increase in the prosecution of corruption cases, including those involving foreign bribery. The NACC and the OAG have been more proactive in investigating and prosecuting such cases.

Law stated - 4 December 2025

Prosecution of foreign companies

In what circumstances can foreign companies be prosecuted for foreign bribery?

Under the Anti-Corruption Act, foreign companies operating in Thailand, even if they are not registered in Thailand, can be held liable for bribery offences and can be prosecuted for foreign bribery if they meet the following conditions:

- Associated persons: If the bribery is conducted by associated persons (eg, employees, agents or joint venture partners) for the benefit of the company, the company can be held liable.
- Lack of appropriate measures: Companies must have adequate internal controls and compliance measures in place to prevent bribery. If a company fails to implement such measures, it can be prosecuted.

Law stated - 4 December 2025

Sanctions

What are the sanctions for individuals and companies violating the foreign bribery rules?

Under the Anti-Corruption Act, individuals and companies found guilty of violating foreign bribery rules face several sanctions:

- Imprisonment and fines: Individuals can be sentenced to imprisonment for up to five years or a fine of up to 100,000 baht, or both.
- Criminal liability for companies: If bribery is conducted by associated persons (eg, employees or agents) for the benefit of the company, and the company lacks adequate internal controls to prevent such offences, the company can be held criminally liable for a fine of one to two times the amount of damage caused or benefits received. Companies include juristic persons established both under Thai laws and under foreign laws that operate businesses in Thailand.
- Collateral sanctions: While the Act itself does not explicitly mention collateral sanctions, companies found guilty of bribery may face additional consequences under other related laws and regulations, including loss of business licences, exclusion from government contracts and reputational damage.

Law stated - 4 December 2025

Recent decisions and investigations

Identify and summarise recent landmark decisions or investigations involving foreign bribery.

Below are some recent landmark decisions and investigations involving foreign bribery in Thailand. These cases highlight Thailand's ongoing efforts to combat corruption and align with international anti-bribery standards.

- John Deere FCPA violations: In September 2024, the US Securities and Exchange Commission charged Deere & Company, doing business as John Deere, with violations of the Foreign Corrupt Practices Act. The charges stemmed from bribes paid by its subsidiary Wirtgen Thailand to Thai government officials and private company employees to secure government contracts and sales. The bribes included cash payments, massage parlour visits and international travel. Deere & Company agreed to pay nearly US\$10 million to resolve the charges.
- Laem Chabang Port bribery scandal: In February 2025, a bribery scandal at Laem Chabang Port, Thailand's busiest deep-sea port for international trade shipments, led to a crackdown on corruption. The Port Authority of Thailand (PAT) launched an urgent investigation into allegations of queue-jumping bribes paid by truck drivers to bypass long lines. The PAT established a working group to investigate the root causes of the traffic congestion and implemented measures to modernise the truck queue management system and improve transparency, and sought assistance from the NACC to strengthen its anti-bribery measures and ensure transparent operations at Laem Chabang Port.

- Bribery of former executives of the Thai state-owned oil and gas company PTT Exploration and Production Public Company Limited (PTTEP): The NACC found four former executives of PTTEP guilty of corruption, collusion and bribery in connection with PTTEP's Arthit Offshore Gas Field Project. The investigation revealed that they manipulated procurement processes and accepted bribes from Rolls-Royce to secure contracts. The case was brought to light following a US investigation into Rolls-Royce's global bribery scheme
- Asset recovery in Ireland related to a Thai foreign-bribery case: In October 2025, the NACC publicly reported that it had worked with Ireland's Criminal Assets Bureau (CAB) and the Chief State Solicitor's Office to recover assets connected to a transnational bribery case. The cooperation led to the confiscation of around €250,000 (approximately 10 million baht) in assets linked to a foreign bribery case involving Thailand that had been transferred to and concealed in Ireland for repatriation back to Thailand. This example of international cooperation shows that Thailand's NACC is actively working with foreign assets-recovery agencies to trace, freeze and bring back the proceeds of foreign bribery.

Law stated - 4 December 2025

FINANCIAL RECORD-KEEPING AND REPORTING

Laws and regulations

What legal rules require accurate corporate books and records, effective internal company controls, periodic financial statements or external auditing in your jurisdiction?

In Thailand, several legal rules and regulations require companies to maintain accurate corporate books and records, implement effective internal controls, produce periodic financial statements and undergo external auditing. Key regulations include the following:

- The Thai Civil and Commercial Code: This Code mandates that all companies maintain accurate and complete accounting records and prepare annual financial statements.
- Accounting Act B.E. 2543 (2000): This Act requires companies to keep accurate books of accounts and financial records and to prepare financial statements per generally accepted accounting principles.
- The Securities and Exchange Act B.E. 2535 (1992): This Act requires publicly listed companies to maintain effective internal controls, prepare periodic financial statements and have their financial statements audited by an independent auditor.
- The Organic Act on Anti-Corruption B.E. 2561 (2018), also known as the Act Supplementing the Constitution Relating to the Prevention and Suppression of Corruption (the Anti-Corruption Act): This Act emphasises the importance of accurate record-keeping and internal controls to prevent and detect corruption, including bribery of foreign public officials.

Law stated - 4 December 2025

Disclosure of violations or irregularities

To what extent must companies disclose violations of anti-bribery laws or associated accounting irregularities?

In Thailand, companies are required to disclose violations of anti-bribery laws and associated accounting irregularities under several legal provisions:

- The Securities and Exchange Act B.E. 2535 (1992): Publicly listed companies must disclose material information, including violations of anti-bribery laws and significant accounting irregularities, to the Securities and Exchange Commission and the public.
- The Accounting Act B.E. 2543 (2000): Companies must maintain accurate books and records and report any discrepancies or irregularities in their financial statements.
- The Anti-Corruption Act: This Act requires companies to implement effective internal controls to prevent and detect bribery. Companies must report any violations of anti-bribery laws to the National Anti-Corruption Commission.

Failure to disclose such violations can result in legal consequences, including fines, penalties and reputational damage.

Law stated - 4 December 2025

Prosecution under financial record-keeping legislation

Are such laws used to prosecute domestic or foreign bribery?

Yes, the Anti-Corruption Act is used to prosecute both domestic and foreign bribery. The Act covers a wide range of corrupt activities, including bribery involving Thai public officials, foreign public officials and officials of international organisations.

Law stated - 4 December 2025

Sanctions for accounting violations

What are the sanctions for violations of the accounting rules associated with the payment of bribes?

Violations of the accounting rules associated with the payment of bribes under the Anti-Corruption Act can result in several sanctions for both individuals and companies:

- Fines: Companies and individuals can face substantial fines.
- Imprisonment: Individuals involved in falsifying records or concealing bribes can be sentenced to imprisonment. The length of the sentence depends on the severity of the offence.
- Disgorgement: Companies may be required to disgorge any illegally gotten gains obtained through bribery. This means that they must return the profits made from the corrupt activities.
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Reputational damage: Beyond legal penalties, companies may suffer significant reputational damage, which may affect their business relationships and market position, especially when they are public companies.

- Additional sanctions: Companies may also face collateral sanctions such as loss of business licences, exclusion from government contracts and oversight by independent monitors to ensure compliance with anti-corruption laws.

Law stated - 4 December 2025

Tax-deductibility of domestic or foreign bribes

Do your jurisdiction's tax laws prohibit the deductibility of domestic or foreign bribes?

Yes, Thailand's tax laws prohibit the deductibility of both domestic and foreign bribes. According to the Thai Revenue Code, only legitimate business expenses can be deducted for tax purposes. Bribes, being illegal payments, cannot be considered legitimate business expenses and therefore are not deductible.

Law stated - 4 December 2025

DOMESTIC BRIBERY

Legal framework

Describe the individual elements of the law prohibiting bribery of a domestic public official in your jurisdiction.

Section 144 of the Thai Penal Code provides for a prohibition of domestic bribery, while section 176 paragraph 1 of the Organic Act on Anti-Corruption B.E. 2561 (2018), also known as the Act Supplementing the Constitution Relating to the Prevention and Suppression of Corruption (the Anti-Corruption Act), addresses the failure to prevent domestic bribery.

Section 144 provides that:

whoever, giving, offering or agreeing to give the property or any other benefit to the official, member of State Legislative Assembly, member of Provincial Assembly or member of Municipal Assembly so as to induce such person to do or not to do any act, or to delay the doing of any act contrary to one's own duty, shall be imprisoned not exceeding 5 years or fined not exceeding Baht 100,000, or both.

Section 176 paragraph 2 requires companies to implement measures to prevent bribery. The law mandates that legal entities establish internal controls, ethics and compliance programmes to prevent corrupt practices. If a company fails to implement these measures and bribery occurs, the company shall be liable to a fine of one to two times the amount of damage caused or benefits received.

Law stated - 4 December 2025

Scope of prohibitions

Does the law prohibit both the paying and receiving of a bribe?

Yes, Thai law punishes both state officials who accept a bribe and individuals who bribe or act as an intermediary to bribe a state official.

Law stated - 4 December 2025

Definition of a domestic public official

How does your jurisdiction define a domestic public official, and does that definition include employees of state-owned or state-controlled companies?

The Anti-Corruption Act section 4 states that 'state official' means:

all state officials across the board, including national, provincial and municipal officials and even includes personnel performing functions for state enterprises, local administrators and members of a local assembly, but does not include some persons that have specific terms, which are a person holding a political position, a judge of a constitutional court, a person holding a position in an independent organisation and a member of the board of the National Anti-Corruption Commission (NACC).

Law stated - 4 December 2025

Gifts, travel and entertainment

Describe any restrictions on providing domestic officials with gifts, travel expenses, meals or entertainment. Do the restrictions apply to both the providing and the receiving of such benefits?

Under Thai law, state officials are prohibited from providing and receiving any kind of benefits, including gifts, travel expenses and meals. However, if benefits not exceeding 3,000 baht in value are received from people other than relatives, and if the benefits are considered customary and traditional gifts generally given to individuals, officials may receive such gifts. If the benefits exceed 3,000 baht, approval from a supervisor is required.

Law stated - 4 December 2025

Facilitating payments

Have the domestic bribery laws been enforced with respect to facilitating or 'grease' payments?

Facilitation payments, as well as other forms of payment, may be considered bribery under section 176 of the Anti-Corruption Act. This section penalises individuals who give, offer

or promise to give any property or benefit to a public official to induce the officials to do, omit, delay or take some actions to his or her usual duties. Therefore, giving or offering any benefits to expedite routine government actions can be held liable, under this section, to imprisonment for up to five years or a fine of up to 100,000 baht, or both.

Law stated - 4 December 2025

Public official participation in commercial activities

What are the restrictions on a domestic public official participating in commercial activities while in office in your jurisdiction?

The Anti-Corruption Act prohibits state officials from being stakeholders, such as being a member of a board of directors, consultant, agent, staff or employee or participating in private businesses under the supervision of their respective government agencies, if such involvement creates a conflict of interest with the public interest.

Law stated - 4 December 2025

Payments through intermediaries or third parties

In what circumstances do the laws prohibit payments through intermediaries or third parties to domestic public officials?

Any attempt to bribe domestic state officials through third parties or intermediaries is prohibited. Both the bribe-giver and the intermediary are criminally liable under Thai law. Section 143 of the Criminal Code and section 175 of the Anti-Corruption Act impose penalties of up to five years in prison or a fine of up to 100,000 baht, or both, for bribery involving public officials.

Law stated - 4 December 2025

Individual and corporate liability

Can both individuals and companies be held liable for violating the domestic bribery rules?

Thai law punishes both individuals and juristic persons for an act of bribery. Under section 144 of the Thai Penal Code and section 176(1) of the Anti-Corruption Act, individuals who give, offer or agree to give bribes to state officials face up to five years in prison or a fine of up to 100,000 baht, or both.

For companies, if an individual who commits an offence under section 176 paragraph 1 is a person associated with a company that does not have appropriate internal control measures in place to prevent bribery, the company may be fined one to two times the damage caused or benefits received, under section 176 paragraph 2.

Law stated - 4 December 2025

Private commercial bribery

To what extent does your jurisdiction's domestic anti-bribery law also prohibit private commercial bribery?

The Anti-Corruption Act primarily focuses on offences relating to the giving or receiving of bribes by state officials. As a result, there are no explicit provisions criminalising bribery in the private commercial sector. Instead, private sector bribery and individual official bribery are generally governed by the Thai Penal Code, which prohibits giving, offering or agreeing to give any property or benefit to induce someone to perform or refrain from performing any act contrary to their duty. Additionally, bribery offences may still be enforced through corporate policies and internal measures.

Law stated - 4 December 2025

Defences

What defences and exemptions are available to those accused of domestic bribery violations?

Section 176 paragraph 2 of the Anti-Corruption Act provides:

a company that does not have appropriate internal control measures to prevent bribery, and if the offense was committed to benefit that company, the juristic person would be deemed to have committed the offense.

Therefore, to defend against an accusation of domestic bribery, the juristic person (the company) must prove that it has appropriate internal control measures in place to prevent bribery. These measures may include policies issued by top management, detailed and clear measures or policies relating to corruption risks, and a strong accounting system. The company may organise an internal seminar on anti-corruption to raise awareness among its employees.

Law stated - 4 December 2025

Agency enforcement

Which government agencies enforce the domestic bribery laws and regulations?

In Thailand, several government agencies share responsibility for enforcing domestic bribery laws, such as the National Anti-Corruption Commission (NACC), which is primarily responsible for investigating and prosecuting bribery and corruption by state officials; the Office of the Attorney General (OAG), which works in conjunction with the NACC to prosecute corruption cases; the Royal Thai Police; and the Department of Special Investigation, which often handles high-profile or politically sensitive bribery cases.

Law stated - 4 December 2025

Patterns in enforcement

Describe any recent shifts in the patterns of enforcement of the domestic bribery rules.

Corruption and bribery cases used to be processed through the regular judicial system, leading to a high case backlog and delays in proceedings. To address this issue, in 2016 (B.E. 2559), the Criminal Court for Corruption and Misconduct Cases was established to separate corruption-related cases from the general judicial system. This reform aimed to expedite case proceedings and ensure that cases are handled by judges with specialised expertise and extensive experience in corruption-related matters.

Law stated - 4 December 2025

Prosecution of foreign companies

In what circumstances can foreign companies be prosecuted for domestic bribery?

Under the Anti-Corruption Act, foreign companies can be prosecuted for domestic bribery if they engage in corrupt practices involving Thai public officials or state enterprises. This includes offering, promising or giving bribes to influence official actions or decisions. The Act applies to any person or entity, regardless of nationality, if the corrupt act occurs within Thailand or involves Thai officials.

Law stated - 4 December 2025

Sanctions

What are the sanctions for individuals and companies that violate the domestic bribery rules?

Individuals and companies that violate domestic bribery laws in Thailand will be criminally liable under Thai law. A private individual who offers a bribe to induce a public official to act (or refrain from acting) contrary to their duty may face imprisonment of up to five years or a fine of up to 10,000 baht, or both.

Regarding the company's liability, a company may face a fine ranging from one to two times the damage caused or benefit received by the juristic person.

Law stated - 4 December 2025

Recent decisions and investigations

Identify and summarise recent landmark decisions and investigations involving domestic bribery laws, including any investigations or decisions involving foreign companies.

In 2024, Thailand's NACC found Mr Jitrapong Kwongsuksathit, a former special subcommittee member of PTT Exploration and Production Public Company Limited (PTTEP), and others guilty in a bribery case involving Rolls-Royce Energy Systems. The bribery was related to securing a contract for the procurement of feed gas turbine compressors for the Arthit Project's central production platform.

The US Department of Justice investigated and later revealed that Rolls-Royce had paid bribes to government officials in multiple countries under a deferred prosecution agreement. Evidence showed that bribes were funnelled through intermediaries to PTTEP officials between 2004 and 2008.

The NACC has forwarded the case to the OAG for criminal prosecution and has requested the forfeiture of bribe money amounting to US\$300,543 (approximately 10 million baht). This case marks a significant corruption investigation involving a multinational corporation in Thailand.

Law stated - 4 December 2025

UPDATE AND TRENDS

Key developments of the past year

Please highlight any recent significant events or trends related to your national anti-corruption laws.

In early 2025, Thai authorities intensified operations against scam centres along the Myanmar border. These centres have been implicated in human trafficking and large-scale fraud, affecting victims across South East Asia. Despite efforts, opposition lawmaker Rangsiman Rome criticised the crackdown as insufficient, urging action against key figures and complicit officials. Prime Minister Paetongtarn Shinawatra acknowledged the urgency, leading to measures such as cutting utilities to affected areas and repatriating over 7,000 foreign nationals. However, concerns persist in the adaptability of these scam networks, especially with their use of technologies such as Starlink satellite internet to circumvent traditional disruptions.

In June 2025, Thailand enacted the Organic Act on Anti-Corruption (No.2) B.E.2568 (2025) – an amendment to the previous version – which introduces additional mechanisms and measures to protect and assist individuals who report or expose corruption. The aim is to build public confidence that whistleblowers will be legally protected and to encourage greater public participation in anti-corruption efforts and reporting of misconduct.

Law stated - 4 December 2025