Legal article

Last updated 15 October 2026

Is your pension protected by a tax treaty? Country by country

By Eksiam Chaisorn, Legal Consultant
Eksiam & Partners Co., Ltd.

> This article is general legal information, not a legal opinion on any specific matter. Each matter must be assessed on its own facts and evidence. The latest online version is at https://retireinthailandadvisory.com/double-tax-agreement-pensions.html

Thailand has more than 60 double-tax agreements, and they disagree with each other about pensions. The same ฿100,000 monthly remittance can be fully exempt for an American, fully assessable for a Briton, and somewhere in between for a German. Always check the treaty *before* deciding which income to remit.

Quick reference (general positions, your facts can change the answer)

Source	General treaty position for a Thai-resident retiree
US Social Security	**Taxable only in the US** (Art. 20, US-Thai DTA). Thailand cannot tax it. More for US citizens
US private pensions, IRA/401(k)	Generally taxable in the residence state (Thailand) when remitted; US tax paid may be creditable. Roth treatment needs case-by-case analysis.
UK state & private pensions	No pension article in the 1981 UK treaty → generally **assessable in Thailand** when remitted. Claims, the frozen rate and Thai tax: UK State Pension in Thailand.

Eksiam & Partners Co., Ltd. | Tax ID 0105569142001
300/90 Premium Place, Nawamin Road, Nawamin, Bueng Kum, Bangkok 10240, Thailand
Tel. +66 81 654 5922 | contact@eksiamlegal.com | eksiamlegal.com
Online version https://retireinthailandadvisory.com/double-tax-agreement-pensions.html

Source	General treaty position for a Thai-resident retiree
UK government-service pensions	Taxable only in the UK.
Australian pensions & super	Generally taxable in the residence state (Thailand) when remitted; government-service pensions stay Australian-taxed. Lump-sum timing is a major planning lever.
German, Dutch, Nordic pensions	Varies, several treaties keep source-state taxing rights on social-security-type pensions. Genuinely case by case.
Canadian pensions (CPP/OAS/RRIF)	Canada generally withholds at source; Thai treatment on remittance with credit for Canadian tax.

Two traps we fix most often: (1) UK retirees assuming "my pension is taxed in the UK so Thailand can't touch it", usually wrong; (2) Americans remitting IRA distributions believing the Social Security rule covers them, it doesn't. Both are solvable with sequencing: remit protected or pre-2024 funds first.

How relief actually works

1. **Exemption:** if the treaty gives your home country exclusive taxing rights (US Social Security, government-service pensions), the income is simply not assessable in Thailand, but keep evidence of what the remittance was.
2. **Credit:** otherwise, foreign tax properly paid on the same income is typically creditable against Thai tax under the treaty, paperwork-heavy but effective. Certificates of tax paid from your home authority are the key document.
3. **Structural:** the LTR visa exempts foreign income of an earlier tax year that you bring into Thailand (section 5 of Royal Decree No. 743), so for that income the treaty question does not arise.

Eksiam & Partners Co., Ltd. | Tax ID 0105569142001
300/90 Premium Place, Nawamin Road, Nawamin, Bueng Kum, Bangkok 10240, Thailand
Tel. +66 81 654 5922 | contact@eksiamlegal.com | eksiamlegal.com
Online version https://retireinthailandadvisory.com/double-tax-agreement-pensions.html

The interaction between treaty relief, the remittance timing rules and Thai allowances is where written advice pays for itself: the order in which you remit different income types can change the bill by hundreds of thousands of baht over a retirement.

Eksiam & Partners Co., Ltd. | Tax ID 0105569142001
300/90 Premium Place, Nawamin Road, Nawamin, Bueng Kum, Bangkok 10240, Thailand
Tel. +66 81 654 5922 | contact@eksiamlegal.com | eksiamlegal.com
Online version https://retireinthailandadvisory.com/double-tax-agreement-pensions.html