



ALVAREZ & MARSAL TAX APAC – TRANSFER PRICING

OUR SERVICE OFFERINGS

STRATEGY AND DESIGN



- Designing modern transfer pricing models that are efficient and resilient in a dynamic regulatory environment, including centralizing cost centres and IP planning
- Reviewing and optimizing existing models to achieve strategic tax objectives and increased tax transparency and efficiency
- Operational implementation guidance and internal governance documentation

OPERATIONAL TRANSFER PRICING



- Assisting with accurate, real-time implementation of transfer pricing policies
- Leverage technology to streamline pricing and minimize input errors
- Proactively monitor and adjust transfer pricing practices to minimize disputes, penalties, and double taxation risks

VALUE CHAIN TRANSFORMATION



- Assisting with the transformation of operating models to align value creation with profit attribution, ensuring that transfer pricing policies reflect the commercial and operational reality on the ground while supporting defensible outcomes in line with OECD and domestic guidelines
- Advising on building resilient supply chain structures to mitigate all manner of tax leakages (including VAT, global tariffs, and other international taxes), achieving operational simplicity and optimizing supply chain delivery

TAX AUDIT AND DISPUTE RESOLUTION



- Strategizing tax audit defense, assisting with expert responses and negotiating with local tax authorities
- Drafting technical defense positions for audit support and responding to disputes
- Advising on the use of tax risk management tools such as tax rulings, Advance Pricing Arrangements, and Mutual Agreement Procedures

DOCUMENTATION AND COMPLIANCE



- Navigating through complex and changing regulations to advise on documentation requirements and deliver on all forms of transfer pricing documentation:
 - Local files
 - Master files
 - Country-by-country reports
 - Disclosure forms
 - BEPS documentation
- Benchmarks and intercompany agreements

FINANCE AND TREASURY PLANNING



- Support pricing for intragroup financial transactions, including cash pooling arrangements, intercompany loans, guarantees, and hedging transactions
- Analyzing capital structure and thin capitalization considerations

CONTACT US



Adnan Begic

Managing Director
Singapore

+65 89634279
abegic@alvarezandmarsal.com



Stuart Simons

Managing Director
Thailand

+668 1931 0753
ssimons@alvarezandmarsal.com



Ichiro Suto

Managing Director
Japan

isuto@alvarezandmarsal.com



Amod Khare

Managing Director
India

a.khare@alvarezandmarsal.com



Eu-Kim Chan

Senior Director
Hong Kong

+852 3102 2613
echan@alvarezandmarsal.com



Mrunalini Bhate

Senior Director
Singapore

+65 8907 3601
mbhate@alvarezandmarsal.com

About Alvarez & Marsal Tax

Alvarez & Marsal Tax, part of Alvarez & Marsal (A&M), a leading global professional services firm, is an independent tax group made up of experienced tax professionals dedicated to providing customized tax advice to clients and investors across a broad range of industries. Its professionals extend A&M's commitment to offering clients a choice in advisors who are free from audit-based conflicts of interest and bring an unyielding commitment to delivering responsive client service. A&M Tax has global presence in major metropolitan markets throughout the Americas, EMEA, and APAC.

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