



TAX

ALVAREZ & MARSAL THAILAND – TRANSFER PRICING

In an evolving global tax landscape shaped by heightened transparency requirements, complex documentation obligations, and the growing assertiveness of tax authorities, managing transfer pricing risk has become a strategic priority for multinational enterprises. The rising scrutiny from regulators and the potential reputational and financial consequences of non-compliance demand a future-proof approach.

A&M's Transfer Pricing team in Thailand supports clients in navigating these challenges by developing robust, tailored strategies that align with both global standards and local regulations. Earmarked by deep industry expertise, we assist across the full cycle of transfer pricing services — including transfer pricing planning, compliance, documentation, controversy support, and risk management—ensuring clients maintain control and transparency across their intercompany transactions.

OUR SERVICE OFFERINGS



STRATEGY AND DESIGN

- Designing transfer pricing models that are efficient and resilient in a dynamic regulatory environment, including centralising 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.



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, and supporting with application for, tax risk management tools such as tax rulings, Advance Pricing Arrangements and Mutual Agreement Procedures.



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.



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.



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.



FINANCE AND TREASURY PLANNING

- Support pricing for intragroup financial transactions, including cash pooling arrangements, intercompany loans, guarantees and hedging transactions.

CONTACT US



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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. To learn more, visit: [AlvarezandMarsal.com/Tax](https://www.alvarezandmarsal.com/Tax).

