

OUR SERVICE OFFERINGS

STRATEGY AND DESIGN



- Designing modern 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.

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.
- Analysing capital structure and thin capitalization considerations.

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About Alvarez & Marsal

Founded in 1983, Alvarez & Marsal is a leading global professional services firm. Renowned for its leadership, action and results, Alvarez & Marsal provides advisory, business performance improvement and turnaround management services, delivering practical solutions to address clients' unique challenges. With a world-wide network of experienced operators, world-class consultants, former regulators and industry authorities, Alvarez & Marsal helps corporates, boards, private equity firms, law firms and government agencies drive transformation, mitigate risk and unlock value at every stage of growth. To learn more, [visit AlvarezandMarsal.com](https://www.alvarezandmarsal.com)