



Imelda Navarro Arroyo

Counsel

Inavarroarroyo@akd.eu

+31 88 253 5268

+31 6 23 35 47 63

The Netherlands

Languages

- Dutch
- English
- Italian
- Spanish

Education

- Universiteit Leiden - Advanced LL.M. International Tax Law
- Universidad Panamericana - Bachelor in Law

About Imelda Navarro Arroyo

Imelda is a Counsel at AKD who specialises in transfer pricing and international tax. Imelda is part of the Tax team. With a cross-border academic and professional background, she brings a deep understanding of the legal and economic dynamics that shape multinational business and their tax operations.

Imelda advises clients on a wide range of transfer pricing matters, with particular experience in the design and implementation of intercompany pricing policies that align with both business strategy and evolving regulatory standards. Imelda supports multinational groups through the full transfer pricing lifecycle—from planning and functional and economic analysis to documentation and audit defence—helping clients ensure compliance while managing tax risk and maintaining operational efficiency. Her practice includes advising on complex cross-border transactions involving services, financing arrangements, intangible assets and supply chain restructuring. Her experience also covers representing clients in dispute resolution processes, including Mutual Agreement Procedures (MAP) and the negotiation of bilateral and multilateral Advance Pricing Agreements (APAs) with tax authorities, aiming to achieve certainty and avoid double taxation. Imelda's work supports multinational groups aligning their global tax positions with OECD standards, local regulations and evolving international tax frameworks.

Imelda's professional experience includes working in the tax teams of law firms in Mexico, the Netherlands, Luxembourg and Italy.