Shardul Amarchand Mangaldas



Sanjiv Malhotra

Senior Advisor – Head of Tax
Tax

Sanjiv Malhotra leads the tax practice of the Firm and has over two decades of experience in handling Indian tax and regulatory matters.

His practice focuses on investment structuring, international tax, tax M&A, tax policy, disputes and transfer pricing. He has advised several Fortune 500 companies on a range of structuring, tax and cross-border dispute resolution matters. Sanjiv has worked on numerous global and regional assignments and has represented many multinational corporations during their audits and litigation in India. He has been working on tax-treaty disputes and Advance Pricing Agreements. Sanjiv also assists clients in negotiating fiscal incentives and tax policy discussions with the Government.

Sanjiv primarily works with foreign multinationals with presence in India. He assists companies from investment / tax structuring stage to implementation and thereon handling key tax risk areas in India. For many clients, Sanjiv has been a valuable extension of their global / regional tax teams and operates as a strategic advisor for them. He also assists clients in tax risk quantification and modelling.

Sanjiv regularly participates in national and international discussions on policy aspects of international tax and transfer pricing. In the past, he has been invited by OECD's working party 6 to share his views on various transfer pricing issues. His articles have been published by the Bureau of National Affairs (BNA), International Taxation, International Fiscal Association (IFA) and Euromoney.

Sanjiv has worked in Tier 1 legal and accounting firms. Prior to joining the Firm, he was working in Baker McKenzie's Singapore Office, where he was a member of Baker McKenzie's Global Transfer Pricing Steering committee and India Focus Group Steering Committee.

Location

- Gurugram

Education

- B. Com (Honors)
- Chartered Accountancy
- Masters in Business Economics – University of Delhi

Practices

- Tax

Professional Membership

- Institute of Chartered Accountants of India

Awards Recognitions

- **Notable Practitioner** for Tax by asialaw Rankings 2025-26
- Ranked as **Leading Practitioner** for General Corporate Tax for India and Singapore by ITR World Tax Rankings 2026