

Gorda Alexander Sergeevich,

Ph.D. in Economics, Associate Professor,
Associate Professor of the Department of World Economy,
V.I. Vernadsky Crimean Federal University,
Simferopol.

Gorda Olga Sergeevna,

Ph.D. in Economics, Associate Professor,
Associate Professor of the Department of World Economy,
V.I. Vernadsky Crimean Federal University,
Simferopol

**OBJECTIVES AND METHODS OF TRANSFER PRICING
IN INTERNATIONAL BUSINESS**

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The nature of transfer pricing as a means of providing competitive advantages in international business is studied by saving on intra-corporate transaction costs, optimizing the tax burden and international movement of capital in corporate interests. The preferences received by multinational and transnational companies are determined through the use of transfer pricing.

The peculiarities of the use of transfer pricing methods recommended by OECD: comparative uncontrolled prices, resale prices, costs plus, net profitability of the operation, profit distribution are considered and analyzed. The analysis showed that all the proposed methods have their own advantages and disadvantages, therefore, the OECD offers the possibility of using other methods that will allow a more reliable determination of the transfer price. The hierarchy of application of these methods in different countries of the world is analyzed.

It has been established that one of the most common methods of illegal capital flight is the manipulation of prices in international trade between subsidiaries, which consist in understating or overstating prices for products in interstate commerce. The existing world experience in methods of estimating the losses of national economies due to outflow of capital has been

studied. In particular, the article discusses such methods as the «residual» model of the World Bank, the model for estimating price manipulation in international trade, developed by the IMF's Trade Statistics Department, the international price determination system, and the «hot money» method.

It is concluded that one of the most important tasks of economic science, national governments and leading international organizations is the search and implementation in practice of effective methods and tools for monitoring, controlling and regulating the activities of international corporations in the use of transfer pricing mechanisms.

Keywords: transfer pricing, transnational corporations, transfer pricing methods, competitiveness, capital outflow.

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: Anthony R.N., Dearden J.[8], Bernard Andrew B. [9], Bhagwati Jagdish N. [10], Clausing Kimberly A. [11], Elizabeth Hughes, Wendy Nicholls [12], Mcaulay L., Tomkins C.R. [16], Pak Simon J. [19], Zdanowicz J. [23, 24].

: [1], [2], [3], [4], [5], [6], [7].

Anthony R.N. Dearden J.

1.

2.

3.

— Mcaulay L. Tomkins C.R. [16] —

[8].

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Jagdish

Bhagwati.

[10].

«
», 1981 .

Kimberly Clausing «
» [11].

1921 . [20].

1982–1994 .

Simon Pak [19].

, Simon Pak

202 50 . 12,1 %

2005 . 5,5 %

J. Zdanowicz, S. Pak,

M. Sullivan (1999),

11,1 % 15,2 %

[23].

«Offshore Shell Games 2015» [18]

Fortune 500 «Apple»

() (180).

59 «Apple»

«Offshore Shell Games 2015» [18], «Apple»,

«Apple» « »

». , 2009–2012 . « 30

«Apple Operations International» —

, «Apple Operations International»

— «General Electric» (120 18),

«Microsoft» (108), «Pfizer» (74 151

2012 . 20 . 9,8 «Microsoft». 2010–

, , - . , 47

145

358 , «Microsoft» « » - . 2014
 — 72% Fortune 500 — . 57
 7622
 6 %, 35%.

(9) , (. 1).

« » . « »

[Empty box]

[Empty box]

«comparable uncontrolled price method» (CUP)

«transactional net margin method» (TNMM)

«Resale price method» (Resale price)

«transactional profit split method» (Profit split)

«cost plus method» (Cost plus)

. 1. [17]

» [17]. (. CUP),

CUP « » . CUP [17].

;

(. Resale price),

» (. Cost plus) [1].

«

»

();

[12].

[5, . 105].

(. — TNMM)

TNMM

« »

CUP Cost plus.

(. Profit solit) [15].

(. 1).

1.

*

| | | CUP | Resale price | Cost plus | TNNM | Profit split | - |
|----|--|-----|--------------|-----------|------|--------------|---|
| 1 | | 1 | + | + | + | + | - |
| 2 | | 1 | + | + | + | + | - |
| 3 | | + | + | + | + | + | + |
| 4 | | + | + | + | + | + | - |
| 5 | | 1 | 2 | 2 | 3 | 3 | - |
| 6 | | + | + | + | + | + | + |
| 7 | | + | + | + | 1 | 1 | - |
| 8 | | + | + | + | + | + | - |
| 9 | | 1 | 2 | 2 | 3 | 3 | - |
| 10 | | + | + | + | + | + | - |
| 11 | | 1 | 1 | 1 | 2 | 2 | - |
| 12 | | 1 | 2 | 2 | 3 | 3 | - |
| 13 | | 1 | 2 | 2 | 3 | 3 | - |
| 14 | | + | + | + | + | + | - |
| 15 | | 1 | 1 | 1 | 2 | 2 | - |
| 16 | | 1 | 2 | 2 | 3 | 3 | - |
| 17 | | + | + | + | + | + | - |
| 18 | | 1 | 2 | 2 | 3 | 3 | - |
| 19 | | 1 | 2 | 2 | 3 | 3 | - |
| 20 | | 1 | 2 | 2 | 3 | 3 | + |
| 21 | | 1 | 1 | 1 | 2 | 2 | - |
| 22 | | 1 | 1 | 1 | 2 | 2 | - |
| 23 | | + | + | + | + | + | + |
| 24 | | 1 | 2 | + | + | + | - |
| 25 | | 1 | + | + | + | + | - |
| 26 | | + | + | + | + | + | - |
| 27 | | 1 | 1 | 1 | 2 | 2 | - |
| 28 | | 1 | 2 | 2 | 3 | 3 | - |
| 29 | | + | + | + | + | + | + |
| 30 | | 1 | 2 | 2 | 3 | 3 | - |
| 31 | | 1 | + | + | + | + | - |
| 32 | | 1 | 2 | 2 | 3 | 3 | + |
| 33 | | 1 | + | + | + | + | - |
| 34 | | + | + | + | 1 | + | - |
| 35 | | + | + | + | + | + | - |
| 36 | | + | + | + | + | + | - |
| 37 | | 1 | 1 | 1 | 2 | 2 | - |
| 38 | | + | + | + | + | + | - |
| 39 | | + | + | + | + | + | + |

: «1», «2», «3» — , «+» — , -
 « , «-» — .
 * [13, 14, 21, 22]

.1, (, -) , (, -) « » (, -) , -

CUP, Resale price.

CUP. (Resale price cost plus).

TNMM Profit Split.

• World Bank Residual Model — « »

KF = ED + FI - CAD - FR, (1)

KF — ; ED — (; FR —);

FI — ; CAD — ; FR —

• Dots-based Trade Mispricing Model —

FOB, « ».

(CIF). 1,19.

CIF, FOB.

• Ipps-based model —

» -4 +4. « » «

[24].

• Hot money method — (« ») « »

« ».

KF = SKO + EO, (2)

KF — ; SKO — ;

EO —

[7]:

50 %

« ».

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