



Critical Concerns in Transfer Pricing and Practice

Wagdy M Abdallah

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For multinational corporations (MNCs), there is arguably no more important operational function that affects all areas of manufacturing, marketing, management, and finance as international transfer pricing—the practicing of supplying products or services across borders from one part of the organization to another. Its complexity is compounded by the impact of e-commerce, speeding the flow of goods and services; intangible assets, such as intellectual property, whose value is difficult to quantify; and the activities of policymakers around the world to update their tax laws and regulations, in efforts to close loopholes that have historically encouraged tax avoidance.

In *Critical Concerns in Transfer Pricing Policy and Practice*, Wagdy Abdallah provides an in-depth overview of these recent trends and developments, and considers their implications for the management of MNCs. In particular, he discusses methods for pricing transferred goods and services in the e-commerce era and analyzes the most recent regulation reforms in such countries as Germany, Mexico, Japan, Canada, the United Kingdom, the United States, and the Netherlands. Anticipating increased scrutiny of MNC transfer pricing practices from governments and other external stakeholders, Abdallah outlines a set of practical recommendations for creating a successful transfer pricing system that maximizes value for the company while remaining sensitive to local policies in all of the countries in which it operates.

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