International Journal of Interdisciplinary Cultural Studies
ISSN: 2327-008X (Print), ISSN: 2327-2554 (Online)
Volume 21, Issue 1, 2026
https://cgscopus.com/index.php/journals

EXAMINING THE INFLUENCE OF TRANSFER PRICING REGULATIONS ON TAX REPORTING PRACTICES AND FINANCIAL ACCOUNTABILITY OF MULTINATIONAL COMPANIES IN DEVELOPING COUNTRIES

Wenni Wahyuandari
Universitas Tulungagung, Indonesia.
wwahyuandari.unita@gmail.com

Muhammad Aulia Budiman
Universitas Negeri Surabaya, Indonesia.

Loso Judijanto
IPOSS Jakarta, Indonesia.

Abstract: This study examines the influence of transfer pricing regulations on tax reporting practices and financial accountability of multinational corporations (MNCs) in developing countries. Transfer pricing, which governs the pricing of intercompany transactions, plays a crucial role in ensuring fair tax distribution and financial transparency. However, the enforcement of these regulations is often challenging in developing economies due to limited institutional capacity, insufficient resources, and political instability. A qualitative literature review was conducted to explore how transfer pricing regulations impact tax compliance, financial accountability, and institutional enforcement. The findings reveal that while transfer pricing regulations are effective in improving tax compliance when properly enforced, weak enforcement mechanisms in developing countries hinder their full potential. Financial accountability is often compromised by the manipulation of transfer prices, which distorts financial statements and undermines market transparency. Institutional capacity, including the training and resources of tax authorities, is a critical factor in ensuring effective enforcement. This study suggests that enhancing institutional capacity, adapting international guidelines to local contexts, and fostering greater international cooperation can improve the enforcement of transfer pricing regulations. The implications of these findings offer valuable insights for policymakers and tax authorities seeking to strengthen tax systems and improve financial transparency in developing countries.
Keywords: Transfer Pricing, Tax Compliance, Financial Accountability, Institutional Capacity, Developing Countries

INTRODUCTION

The growing global economy has led to the expansion of multinational companies (MNCs), which increasingly operate in multiple jurisdictions, each with distinct tax regulations and economic environments. Transfer pricing (TP) refers to the prices at which goods, services, and intellectual property are transferred within MNCs across different subsidiaries or affiliates. The significance of TP regulations lies in their ability to mitigate tax evasion and

ensure that profits are reported in the appropriate tax jurisdictions [1]. However, the enforcement of these regulations is complex, especially in developing countries, where economic, legal, and institutional challenges may hinder the effective implementation and monitoring of transfer pricing policies [2].

Developing countries, in particular, are facing increasing challenges related to tax reporting and financial accountability due to the rapid globalization of trade and investments. The lack of sophisticated regulatory frameworks, limited resources for tax enforcement, and vulnerability to aggressive tax avoidance strategies by multinational corporations make them particularly susceptible to financial irregularities [3]. While transfer pricing regulations have been established to prevent profit shifting and ensure fair taxation, the actual impact of these regulations on tax reporting practices and financial accountability remains underexplored, particularly in developing economies [4].

This research seeks to examine the influence of transfer pricing regulations on tax reporting practices and the financial accountability of multinational companies operating in developing countries. Despite the adoption of guidelines from international bodies such as the OECD, there are vast discrepancies in how these regulations are enforced and adhered to across different regions. The lack of empirical studies focusing on the unique challenges faced by developing countries in enforcing these regulations presents a significant gap in the literature. In particular, little attention has been paid to the nuances of how local economic conditions, institutional frameworks, and governmental capacity shape the effectiveness of transfer pricing in achieving transparency and fairness in tax reporting.

The novelty of this study lies in its focus on the interplay between transfer pricing regulations and the broader institutional context in developing countries. While existing research has mainly focused on the technical aspects of transfer pricing compliance, this study takes a more holistic approach by exploring the relationship between institutional capacity, regulatory enforcement, and corporate financial practices. By examining these factors, the study aims to contribute new insights into how developing countries can improve tax reporting practices and ensure greater financial accountability within the global business environment.

In terms of research gaps, previous studies on transfer pricing have predominantly concentrated on developed countries or have provided generalized insights that fail to account for the unique challenges in developing economies. Few studies have explored how multinational corporations in these countries adapt their financial reporting and tax strategies in response to weak enforcement mechanisms or imperfect regulatory environments. Moreover, limited attention has been given to the specific ways in which the cultural, political, and economic factors in developing countries influence the relationship between transfer pricing and tax reporting practices.

This research, therefore, contributes to bridging this gap by focusing on the dynamic relationship between transfer pricing regulations, tax compliance, and the financial practices of multinational companies in developing countries. It not only adds to the body of knowledge on international taxation but also provides practical insights for policymakers, tax authorities, and multinational corporations seeking to navigate the complexities of global taxation and financial reporting in emerging markets.

International Journal of Interdisciplinary Cultural Studies
ISSN: 2327-008X (Print), ISSN: 2327-2554 (Online)
Volume 21, Issue 1, 2026
https://cgscopus.com/index.php/journals

LITERATURE REVIEW

Transfer Pricing Regulations and Tax Compliance

Transfer pricing regulations are central to the fight against tax avoidance and profit shifting by multinational corporations. According to the OECD Transfer Pricing Guidelines, the arms-length principle is the primary method used to set prices for intercompany transactions in a way that reflects market conditions and avoids the shifting of profits to low-tax jurisdictions. Multinational corporations often engage in aggressive tax planning strategies that exploit differences in tax rates across jurisdictions, particularly in developing countries where tax enforcement is weaker [5]. The global nature of business operations, combined with the complexity of transfer pricing rules, often presents challenges for tax authorities to monitor and ensure compliance effectively. While many developed countries have sophisticated transfer pricing frameworks, developing countries struggle with limited resources and institutional capacity to implement such regulations effectively [6].

In recent years, numerous studies have explored the relationship between transfer pricing regulations and tax compliance, highlighting the challenges faced by developing countries in enforcing these rules. Weak enforcement mechanisms in developing economies make them more vulnerable to aggressive transfer pricing practices. This has led to an increased interest in understanding how these regulations can be strengthened and adapted to local contexts to ensure compliance. Some scholars suggest that the implementation of more stringent transfer pricing rules, as well as international cooperation, could improve tax reporting practices in developing countries [7]. However, the impact of these regulations on tax compliance and reporting varies widely depending on the local economic environment, the capacity of tax authorities, and the political will to address these issues. This discrepancy highlights the need for further research into how regulatory frameworks can be more effectively tailored to the specific needs of developing countries.

Financial Accountability in Multinational Corporations

Financial accountability is a critical aspect of corporate governance, particularly in the context of multinational corporations (MNCs) operating across diverse jurisdictions. MNCs are often seen as key players in driving economic growth, but they are also scrutinized for their role in tax avoidance and the opacity of their financial practices. The complexity of international financial reporting standards, coupled with inconsistent regulatory enforcement, has led to concerns over the accuracy and transparency of financial statements. The role of transfer pricing in shaping financial accountability is significant, as it directly affects how profits are reported and taxed across different subsidiaries. According to past studies, the manipulation of transfer prices can have profound effects on the financial statements of MNCs, leading to discrepancies in reported profits and tax liabilities, which, in turn, undermine accountability [8].

Despite the importance of financial accountability, research in this area remains sparse, particularly in the context of developing countries. A few studies have examined how MNCs' financial reporting practices are influenced by transfer pricing regulations. For instance, found that MNCs with subsidiaries in developing countries often engage in earnings management to reduce their overall tax burden. This practice not only affects the accuracy of financial reports

but also reduces the transparency of financial accountability. In many developing economies, the lack of effective regulatory oversight and weak institutional frameworks exacerbate these challenges [9]. As a result, financial accountability in multinational companies is often compromised, leading to reduced investor confidence and potential loss of tax revenue for governments. Understanding how transfer pricing affects the transparency of financial reporting practices in these regions is essential for improving financial accountability and governance in global business operations [10].

Institutional Capacity and Transfer Pricing Inforcement

The institutional capacity of tax authorities in developing countries plays a pivotal role in the effective enforcement of transfer pricing regulations. According to recent studies the ability of governments to detect and address transfer pricing manipulation is often determined by the strength of their institutions, including the capacity of tax authorities, legal frameworks, and the availability of resources for enforcement [11]. In many developing countries, the tax authorities are underfunded and understaffed, making it difficult to carry out thorough audits and investigations of complex transfer pricing arrangements. This has led to a reliance on international guidelines, such as the OECD's recommendations, to fill the gaps in local regulatory frameworks. However, the one-size-fits-all approach of these guidelines may not be effective in addressing the unique challenges faced by developing economies, where tax authorities often lack the technical expertise to implement and monitor complex transfer pricing rules [12].

Several studies highlight the importance of building institutional capacity to enhance the enforcement of transfer pricing regulations. For example, institutional reforms, including better training for tax inspectors and enhanced cooperation between tax authorities in different jurisdictions, can significantly improve the effectiveness of transfer pricing enforcement in developing countries. Moreover, the involvement of international organizations such as the World Bank and the United Nations in providing technical assistance and capacity-building initiatives has been identified as crucial in strengthening local institutions [13]. However, even with external support, the challenges posed by weak governance, corruption, and limited political will in some developing countries can undermine these efforts. Therefore, understanding the role of institutional capacity in the enforcement of transfer pricing regulations is crucial for identifying practical solutions to improve tax compliance and financial accountability in these regions

METHODOLOGY

Research Design

The research design for this qualitative literature review is grounded in a systematic and thematic approach to synthesizing existing studies on transfer pricing regulations and their impact on tax reporting and financial accountability in multinational companies operating in developing countries. The research design aims to explore three primary themes: the effectiveness of transfer pricing regulations in ensuring tax compliance, the role of financial

accountability in multinational corporations, and the influence of institutional capacity on enforcing transfer pricing regulations. This design allows the study to draw connections between regulatory frameworks and real-world practices, highlighting the challenges faced by developing countries in this area.

The research follows a descriptive and exploratory approach, focusing on synthesizing insights from the literature to understand the dynamics of transfer pricing regulations and their broader implications. The study does not aim to test hypotheses or collect primary data; rather, it seeks to develop a comprehensive understanding of the state of knowledge on the topic. The goal is to fill a gap in the literature by providing a thorough analysis of the unique challenges faced by developing countries in implementing and enforcing transfer pricing regulations, which has not been sufficiently addressed in previous studies.

Data Collection and Selection Criteria

The first step in the research process was to collect relevant literature through a systematic search strategy. A variety of data sources were used, including peer-reviewed academic journals, books, policy papers, reports from international organizations such as the OECD, and case studies published by consulting firms and governmental agencies. The search was conducted using databases such as Scopus, JSTOR, Google Scholar, and the Social Science Research Network (SSRN). The following selection criteria were applied to include studies in the review:

1. Publication date: Studies published within the last 6 years (from 2020 to the present) to ensure the research reflects contemporary issues related to transfer pricing regulations.
2. Geographical focus: Research focused specifically on developing countries or comparative studies that include developing and developed countries to provide context on how these regulations are applied across regions.
3. Focus on transfer pricing regulations and financial accountability: Studies that examine the impact of transfer pricing on tax compliance, financial transparency, and reporting practices of multinational companies.
4. Empirical or theoretical contributions: Both empirical studies (qualitative or quantitative) and theoretical papers were considered to provide a well-rounded understanding of the topic.

A total of 25 articles, books, and reports were selected based on these criteria. The literature selected covers a wide range of disciplines, including international business, taxation, economics, and governance, allowing for a multi-dimensional understanding of the research topic.

Data Analysis and Synthesis

The data analysis process involved identifying common themes and patterns across the selected literature. Thematic analysis was used as the primary method of data analysis, which involved coding the findings of each study into predefined themes based on the research questions and objectives of the review. The main themes identified from the literature include:

1. Transfer pricing regulations and tax compliance: The impact of transfer pricing rules on multinational corporations' tax reporting practices and their ability to comply with local and international tax laws.

2. Financial accountability in multinational corporations: How transfer pricing affects the financial transparency of MNCs, particularly in relation to profit shifting, tax evasion, and the accuracy of financial statements.
3. Institutional capacity for enforcement: The role of governmental institutions in developing countries and their ability to implement and enforce transfer pricing regulations effectively, including challenges related to resource constraints and political factors.

RESULT AND DISCUSSION

Integration of Environmental Auditing into Corporate Risk Management

Impact of Transfer Pricing Regulations on Tax Compliance

Transfer pricing regulations play a crucial role in shaping the tax compliance behavior of multinational corporations (MNCs). By establishing clear rules for pricing intra-group transactions, these regulations help prevent the manipulation of profits that could be shifted to low-tax jurisdictions. However, the effectiveness of these regulations depends heavily on the capacity of tax authorities to monitor and enforce compliance. In many cases, multinational corporations adjust their transfer pricing strategies to minimize their tax liabilities, which can lead to discrepancies in tax reporting if not properly regulated [14].

The enforcement of transfer pricing regulations ensures that MNCs report their income and expenses accurately across jurisdictions, aligning their financial statements with the real economic activities occurring in each country. This process promotes tax compliance by reducing the potential for tax evasion, but challenges persist in developing countries where tax authorities may lack the resources or technical expertise to fully scrutinize transfer pricing arrangements [15]. As such, countries with better enforcement capabilities tend to see higher levels of tax compliance, whereas those with weaker regulatory frameworks remain more vulnerable to tax avoidance practices.

Despite these challenges, strengthening the enforcement of transfer pricing regulations can lead to improved tax compliance, especially when supported by international cooperation and technical assistance. Developing countries that receive support in enhancing their regulatory frameworks often experience an increase in tax revenue due to better compliance with both local and international tax standards [16].

Influence of Transfer Pricing on Financial Accountability

Financial accountability in multinational corporations is heavily influenced by the way transfer prices are set between subsidiaries. When these prices are manipulated, it can result in distorted financial reports, which do not reflect the true financial health of the company. Such discrepancies can lead to misleading financial statements, which not only affect tax reporting but also impact investor confidence and the transparency of the market. Many companies engage in earnings management through transfer pricing to lower their effective tax rate, which undermines the principle of fair financial reporting [17].

In cases where transfer pricing regulations are effectively enforced, the financial accountability of MNCs improves, as companies are required to adhere to standardized reporting practices. This ensures that financial statements are consistent with actual business activities and

reflect true profit margins. However, in regions with weak regulatory environments, MNCs may exploit loopholes in the system, leading to financial misreporting and a lack of accountability. The role of regulatory agencies becomes crucial in curbing such practices by requiring MNCs to demonstrate transparent financial reporting and ensuring that they comply with established transfer pricing guidelines [18].

Improving financial accountability requires stricter oversight of multinational corporations and better monitoring of their transfer pricing practices. This is particularly relevant for developing countries, where the absence of strong enforcement mechanisms can lead to widespread tax evasion and financial misreporting. By focusing on transparency and accountability in financial statements, these countries can foster greater trust in their financial markets and improve both domestic and international perceptions of corporate governance.

Institutional Capacity and Transfer Pricing Enforcement

The capacity of tax authorities to enforce transfer pricing regulations is a critical factor in determining the effectiveness of tax compliance and financial accountability in multinational corporations. In many developing countries, institutional capacity is often limited by inadequate resources, poor technical expertise, and lack of political will. This weak institutional framework creates a significant barrier to the enforcement of transfer pricing rules, allowing multinational corporations to exploit regulatory loopholes for profit shifting and tax evasion.

Strengthening institutional capacity is essential for improving the effectiveness of transfer pricing enforcement. Tax authorities in developing countries often rely on international guidelines and support from global institutions to help build their enforcement capabilities [19]. However, even with such support, challenges remain in adapting these guidelines to local conditions and ensuring that they are effectively implemented. Enhancing the technical capacity of tax inspectors and improving data collection systems can significantly reduce instances of tax avoidance and improve the accuracy of financial reporting by MNCs.

Developing countries that invest in institutional reforms are likely to see improvements in both tax compliance and financial accountability. As tax authorities gain more experience and access to better tools, the capacity to monitor and enforce transfer pricing regulations improves, leading to more accurate reporting and greater transparency in multinational corporations' financial practices.

Regulatory Impact on Developing Countries

The impact of transfer pricing regulations in developing countries is varied, with some countries seeing improvements in tax compliance and financial transparency, while others continue to struggle with enforcement challenges. In many cases, transfer pricing regulations in developing countries are shaped by international recommendations, such as those from the OECD, but their effectiveness is constrained by local economic conditions and institutional limitations [20]. While some countries have made strides in improving regulatory frameworks, the actual enforcement remains inconsistent, which undermines the potential for these regulations to ensure fair taxation and financial reporting.

In developing economies, the impact of transfer pricing regulations is often shaped by the

International Journal of Interdisciplinary Cultural Studies
ISSN: 2327-008X (Print), ISSN: 2327-2554 (Online)
Volume 21, Issue 1, 2026
https://cgscopus.com/index.php/journals

broader institutional and economic context. Countries with higher levels of institutional capacity, greater resources, and stronger political will are more likely to see positive outcomes from the implementation of these regulations. Conversely, countries with weaker institutions and limited resources may find it difficult to fully enforce transfer pricing guidelines, which allows multinational corporations to continue exploiting tax loopholes. The adaptation of regulations to local needs is crucial for improving their effectiveness and ensuring that developing countries benefit from international tax compliance standards [21].

The effectiveness of transfer pricing regulations in developing countries is dependent on their ability to tailor enforcement mechanisms to local contexts while building institutional capacity. By doing so, these countries can improve their tax compliance rates, enhance financial accountability, and ensure that multinational corporations contribute fairly to the local economy. The table below summarizes the regulatory impact and the need for adaptive approaches to enforcement in developing countries.

Table 1. Summary of Key Findings and Implications on Transfer Pricing Regulations in Developing Countries

Study Focus	Key Findings	Implications
Tax Compliance	Transfer pricing regulations impact MNCs' tax reporting practices and overall tax compliance by ensuring profits are accurately reported across jurisdictions.	Enhancing tax reporting mechanisms could lead to higher tax revenue and greater compliance with international tax standards.
Financial Accountability	The manipulation of transfer prices in MNCs often leads to discrepancies in financial reports, compromising financial accountability and transparency.	Improving financial accountability requires stricter enforcement and better monitoring of multinational corporations' financial statements.
Institutional Capacity	Weak institutional capacity in developing countries hinders effective enforcement of transfer pricing regulations, leading to higher instances of tax avoidance and financial misreporting.	Strengthening institutional capacity can improve enforcement efforts, reduce tax evasion, and ensure better alignment with international regulations.
Regulatory Impact	Transfer pricing regulations have mixed results on developing countries. In some instances, they improve tax compliance, but enforcement challenges persist due to limited resources.	Countries may need to adapt transfer pricing regulations to better suit their unique institutional and economic environments to improve enforcement outcomes.

Discussion

The findings from the literature review highlight the complex relationship between transfer pricing regulations, tax compliance, financial accountability, and institutional capacity in developing countries. One of the key takeaways is the critical role that transfer pricing

regulations play in improving tax compliance among multinational corporations (MNCs). When effectively enforced, these regulations help ensure that MNCs report their profits accurately, minimizing the risk of profit shifting to low-tax jurisdictions. However, the ability of developing countries to enforce these regulations is often limited by insufficient resources and a lack of technical expertise within tax authorities [22]. As a result, while the regulations themselves may be sound, their effectiveness is compromised if enforcement mechanisms are weak or underdeveloped.

Another important insight from this review is the significant impact that transfer pricing practices have on the financial accountability of MNCs. The manipulation of transfer prices can distort financial reports, leading to a lack of transparency and accountability. This not only affects the tax reporting but can also undermine investor confidence, as financial statements no longer reflect the true economic performance of the company. While developed countries have more robust regulatory frameworks to monitor and correct such discrepancies, many developing nations struggle to maintain effective oversight due to institutional weaknesses [23]. This highlights the need for greater investment in both human and technical resources to enhance the accountability of MNCs operating in these regions.

Institutional capacity is a recurring theme throughout the literature, with numerous studies indicating that the effectiveness of transfer pricing enforcement in developing countries is highly dependent on the strength of local institutions. Developing countries often face challenges such as underfunded tax authorities, a lack of specialized knowledge among tax inspectors, and political instability, all of which hinder the enforcement of transfer pricing regulations. Strengthening institutional capacity is therefore crucial to addressing these challenges [24]. Governments and international organizations can play a vital role in providing technical assistance and capacity-building programs that help enhance the skills of tax authorities and improve the overall enforcement framework.

The regulatory impact of transfer pricing regulations in developing countries is multifaceted. While these regulations have the potential to improve tax compliance and financial accountability, their success is largely contingent on the unique institutional, economic, and political contexts of each country. In some cases, the adoption of international guidelines such as those from the OECD has led to positive changes, but in other instances, these guidelines are not sufficiently adapted to the local realities [25]. Therefore, it is essential for developing countries to tailor transfer pricing regulations to their specific needs and challenges. This includes adapting enforcement strategies and regulatory frameworks to fit local economic conditions, institutional capacities, and political environments, which will ultimately lead to more effective and sustainable tax and financial systems.

CONCLUSION

This in conclusion, the literature review underscores the crucial role that transfer pricing regulations play in shaping tax compliance, financial accountability, and the overall governance of multinational corporations (MNCs) in developing countries. While transfer pricing regulations are designed to ensure that profits are accurately reported and tax obligations are met, the effectiveness of these regulations is often limited by the institutional capacity of developing

countries. Weak enforcement mechanisms, coupled with insufficient resources and expertise, hinder the ability of tax authorities to ensure compliance, leading to tax avoidance and financial misreporting.

The implications of these findings are significant for policymakers, tax authorities, and international organizations. To improve tax compliance and financial transparency, developing countries must invest in strengthening their institutional capacity to enforce transfer pricing regulations effectively. This includes providing adequate training and resources to tax authorities, adopting advanced technologies for monitoring and enforcement, and fostering greater international cooperation to address cross-border tax issues. Furthermore, governments should consider adapting international guidelines, such as those from the OECD, to suit the unique economic, political, and institutional contexts of their countries, ensuring that transfer pricing regulations are practical and enforceable in local settings.

Based on the findings of this study, several recommendations can be made. First, developing countries should prioritize institutional reforms to enhance the technical and financial capacity of their tax authorities, enabling them to better monitor and enforce transfer pricing regulations. Second, there should be a concerted effort to tailor transfer pricing rules to local contexts, recognizing the specific challenges faced by different countries. Finally, international organizations should continue to provide technical assistance and capacity-building programs to help developing countries strengthen their tax systems. By addressing these areas, developing countries can improve tax compliance, increase financial accountability, and create a more transparent and efficient business environment for multinational corporations operating in their jurisdictions.

References:

[1] A. Kalra and M. N. I. Afzal, “Transfer pricing practices in multinational corporations and their effects on developing countries’ tax revenue: a systematic literature review,” *Int. Trade, Polit. Dev.*, vol. 7, no. 3, pp. 172–190, 2023.

[2] M. Mukarramah and L. Nugroho, “The effect of transfer pricing, earning management, csr and firm size in tax avoidance,” *Res. Horiz.*, vol. 5, no. 2, pp. 71–82, 2025.

[3] S. C. MADAWA and E. O. Frank, “An Empirical Analysis Of The Adoption And Execution Challenges Of Transfer Pricing Regulations In Nigeria.,” *J. Acad. Res. Econ.*, vol. 14, no. 3, 2022.

[4] L. Ž. Tanasić, S. M. Lalić, Ž. Jovičić, and T. M. Petrović, “The impact of transfer pricing on the optimization of the financial and tax positions of related entities in the Republic of Srpska,” *Ekon. horizonti*, vol. 27, no. 2, pp. 159–175, 2025.

[5] D. E. Wahyudi, T. Sutrisno, and M. K. Rusydi, “Determinants of transfer pricing aggressiveness with the moderation of corporate governance in Indonesia and Malaysia,” *J. Econ. Business, Account. Ventur.*, vol. 24, no. 1, pp. 23–33, 2021.

[6] K. P. Kumalasari, E. G. Sukoharsono, L. Purwanti, and Roekhudin, “Revisiting the CUP method in transfer pricing: global challenges and insights from an SLR,” *Cogent Bus. Manag.*, vol. 12, no. 1, p. 2570884, 2025.

[7] M. Hearson, J. W. Ndubai, and T. Randriamanalina, “The Appropriateness of International Tax Norms to Developing Country Contexts,” *FACTI Backgr. Pap.*, vol. 3, 2020.

[8] J. T. Satande, U. Hove, and M. Jachi, “Taxation policy and tax administration efficiency:

Evidence from Zimbabwe's transfer pricing legislation of 2016," *Aegaeum J.*, vol. 9, no. 4, pp. 360–374, 2021.

[9] A. Chinonyerem, "Critical Analysis of Transfer Pricing Regulation in Nigeria," *Available SSRN 5107123*, 2024.

[10] M. Birtch, "Examining transfer pricing to improve multinationals' competitiveness," 2024, *Cranfield University*.

[11] F. Rabbi and S. S. Almutairi, "Corporate Tax Avoidance Practices Of Multinationals And Country Responses To Improve Quality Of Compliance.," *Int. J. Qual. Res.*, vol. 15, no. 1, 2021.

[12] D. S. Wulandari, V. Yulianti, and A. Fuadi, "Enhancing Corporate Integrity: Profitability, Transfer Pricing, and Tax Avoidance with the Role of Bonus Mechanisms and Stewardship Theory," *J. Appl. Account. Tax.*, vol. 10, no. 2, pp. 179–192, 2025.

[13] E. Fasita, A. Firmansyah, and F. Irawan, "Transfer Pricing Aggressiveness, Thin Capitalization, Political Connection, Tax Avoidance: Does Corporate Governance Have A Role in Indonesia?," *Ris. Akunt. Dan Keuang. Indones.*, pp. 63–93, 2022.

[14] A. Middleton and J. Muttonen, *Multinational enterprises and transparent tax reporting*. Routledge, 2020.

[15] R. A. Santoso and L. L. Fuadah, "Systematic Literature Review: The Impact of Profitability, Leverage, and Taxation on Transfer Pricing in Companies," *Balanc. J. Akunt. dan Manaj.*, vol. 4, no. 1, pp. 308–321, 2025.

[16] A. Melega, "Accounting and Tax Policies Applied to Transfer Pricing in BRICS Economies," in *Geopolitical Risks in Financial Reporting and Transfer Pricing*, Springer, 2025, pp. 93–141.

[17] H. S. Muhammad and I. Alhassan, "Multinational companies and transfer pricing manipulations in Nigeria: Challenges and way forward," *Singaporean J. Bus. Econ. Manag.*, vol. 10, no. 3), pp. 53–58, 2024.

[18] H. S. Muhammed and I. Alhassan, "Transfer Pricing Manipulations of Multinational Companies and Economic Development in Nigeria," *Int. J. Account. Tax.*, vol. 12, pp. 1–13, 2025.

[19] M. N. A. Mohd, N. H. M. Nor, N. Abd Hamid, R. Shamsudin, and A. Widyaningsih, "The Ethics of Transfer Pricing: Corporate Social Responsibility, Accountability, and the Tax Avoidance Dilemma," *Issues Soc. Environ. Account.*, vol. 19, no. 4, pp. 75–89, 2025.

[20] A. A. T. Rathke, A. J. Rezende, and C. Watrin, "The impact of countries' transfer pricing rules on profit shifting," *J. Appl. Account. Res.*, vol. 22, no. 1, pp. 22–49, 2021.

[21] J. Kumari and L. B. Jaiswal, "Ethical Issues in Cross-Border Financial Reporting: An Analysis of Transfer Pricing, Tax Avoidance, and Creative Accounting Practices," 2026.

[22] F. A. Taufik, C. P. Aurelia, I. A. R. N. Putri, M. D. Sagita, and M. Kholmi, "Literature Review on the Effectiveness of Transfer Pricing Regulations in Reducing Tax Avoidance in Multinational Corporations," *J. Ris. Akunt. Soedirman*, vol. 4, no. 2, pp. 359–370, 2025.

[23] W. Eukeria and F. Y. Mpofu, "Manipulation of transfer pricing rules by multinational enterprises in developing countries: The challenges and solutions," *J. Tax Reform*, vol. 10, no. 1, pp. 181–207, 2024.

[24] F. Sebele-Mpofu, E. Mashiri, and S. C. Schwartz, "An exposition of transfer pricing motives, strategies and their implementation in tax avoidance by MNEs in developing countries," *Cogent Bus. Manag.*, vol. 8, no. 1, p. 1944007, 2021.

[25] O. O. Elumilade, I. A. Ogundeji, G. O. Achumie, H. E. Omokhoa, and B. M. Omowole, "Optimizing corporate tax strategies and transfer pricing policies to improve financial efficiency and compliance," *J. Adv. Multidiscip. Res.*, vol. 1, no. 2, pp. 28–38, 2022.