BABEŞ – BOLYAI UNIVERSITY

FACULTY OF ECONOMICS AND BUSINESS ADMINISTRATION

ACCOUNTING AND AUDIT DEPARTMENT

Abstract of doctoral thesis

RELATED PARTY TRANSACTIONS – TRANSFER PRICING ISSUES

Scientific coordinator:
Prof. Phd. Adriana Tiron Tudor

PhD Student:
Alexandra Corlaciu (Rogojan)

Cluj – Napoca
2013

„It is a great happiness to widen

the boundaries of human knowledge."

Alexander von Humboldt (1769 – 1859)

THESIS SUMMARY TABLE OF CONTENTS

THESIS TABLE OF CONTENTS

KEY WORDS

Related party, related party transactions, IAS 24, transfer pricing, the OECD guidelines on transfer pricing, BEPS, information on related party in the financial statements of companies listed on BVB, the perception of Romanian professionals on transfer pricing

INTRODUCTION

The development of related party transactions is facilitated by current globalization phenomenon whose manifestation is becoming stronger. Thus, according to statistics, more than a third of world trade and over 80% of transactions that transfer technologies are carried out between related parties (Li, 2006, p.28).

Among the most obvious reasons behind intra-group transactions and companies internalisation are: economies of scale, reduction of fixed costs, the existence of unused production capacity, the avoidance of negotiation and transaction costs, splitting the production process, specific characteristics of the products, the need for security, the need for commercial secrecy, accounting policies, tax avoidance, regional treaties provisions (EU, NAFTA), the abolition of protectionism (Georgopoulos et al., 2007, p 45, and Lall, 1978; Dunning , 2000, cited by Georgopoulos et al., 2007, p 48).

The table below shows the synthetized main reasons underlying transactions within a group:

Table 1. The main reasons for intra-group transactions

REASON	EXPLICATION
The advantages of specialization / economies of scale	Subsidiaries acquire semi / intermediate goods that are further processed with their own techniques and then are transferred to other entities in the group dealing with the next phases of the production process until the final product is obtained. In this way, the group as a whole enjoys the benefits of specialization and economies of scale achieved.
Quality control of intermediate products	Purchases of intermediate products in the group are significantly safer in terms of quality than the products purchased from third parties.
Exploiting low production costs	Groups have the ability to place certain operations in countries where the cost of raw materials and labor are low, which brings an advantage.
	Certain companies in the group performs research & developement

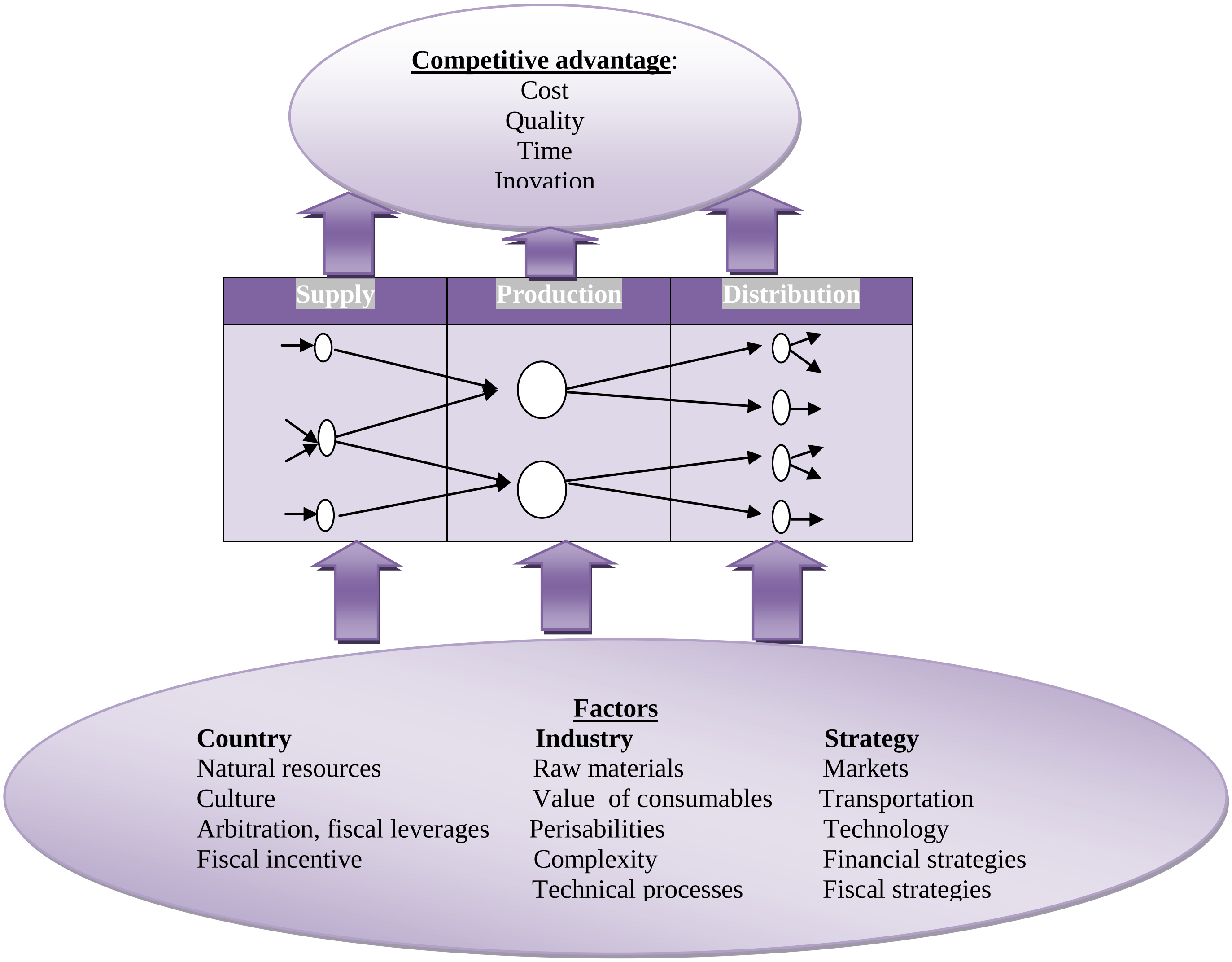
Depreciation costs of research - development	expenses for new products or technologies development. To exploit the R&D, there are created new branches which applies those results and which are invoiced by the company performing the R&D activities.
Knowhow protection against competitors	By creating new subsidiaries applying the research results instead they are sold to third parties, the knowhow remain in the group, being protected from a possible "theft" by the competition.
Exploiting global sales and marketing network of the parent / group	The groups generally hold global sales and marketing networks, used by all subsidiaries (in this sense, a company that is part of a group has an advantage over a company that operates independently because the first has access to group developed network of clients, while the self must find by itself the customers).
Fiscal reasons (tax avoidance)	Groups have the ability to structure transactions so that the activities that bring the greatest profits to be made in low-tax countries.
Maximizing the profit of parent / group as a whole	The profit of the group as a whole is maximized as a result of efficient operations (the benefits of specialization, economies of scale achieved by the placement of activities in countries where costs are low, the opportunity to share the costs of research - development between subsidiaries using research results, etc.).

Source: processed from Georgopoulos *et al*. (2007, p. 52)

It is already known the idea that global competition has the potential to change the way goods are produced and distributed worldwide, so that the various activities of the groups creating added value are dispersed in various countries and coordinated in order to gain competitive advantages. However, to benefit from the competitive advantage it is necessary that creating value-added activities to be carried out in jurisdictions that provide unique comparative advantages. In this regard, a good manager must identify and take control of factors influencing the group performance in each of the three main stages of the value creation process, namely: supply, production and distribution (Prasad & Sounderpandian, 2003, p 241). The same authors believe that in order to gain competitive advantage through global value creation chain, a MNE must: provide the highest quality (De Meyer et al., 1989, Fawcett et al., 1993), to the lowest cost (Goonatilake, 1990), in the shortest time (Haug, 1985, Fawcett & Office, 1992), including after - sales service (Porter, 1986).

Graphical representation of a global value creation chain (focusing on factors favoring performance) is shown in the figure below:

Figure 1. Global value added chain



Source: Prasad & Sounderpandian (2003, p.242)

In order to achieve the above aim, to maintain supremacy over competitors and to obtain bigger profits, entities within groups (due to their relationship) have the ability to perform transactions that independent parties would not do. For here lies the importance of regulations in the field of financial accounting reporting, whose objective (among others) is also to ensure that the financial statements of entities holding related parties are not distorted by their presence or by transactions conducted with them.

In the same time, the prices of related party transactions, known as transfer pricing, and in particular their fiscal valence, are of an overwhelming and growing importance, both for MNE and tax administrations, because these prices have a major impact on the fiscal outcome of the groups (and therefore on the level of taxes due by those).

In this context, we considered that studying the "related party relationships" and how the "prices of transactions carried out between them" are fixed, is a multidisciplinary field analysis (accounting, auditing, taxation, corporate governance, etc.), complex and delicate at the same time, which can be subject to an extensive scientific research, whose result we hope to be interesting and to bring added value on this field knowledge.

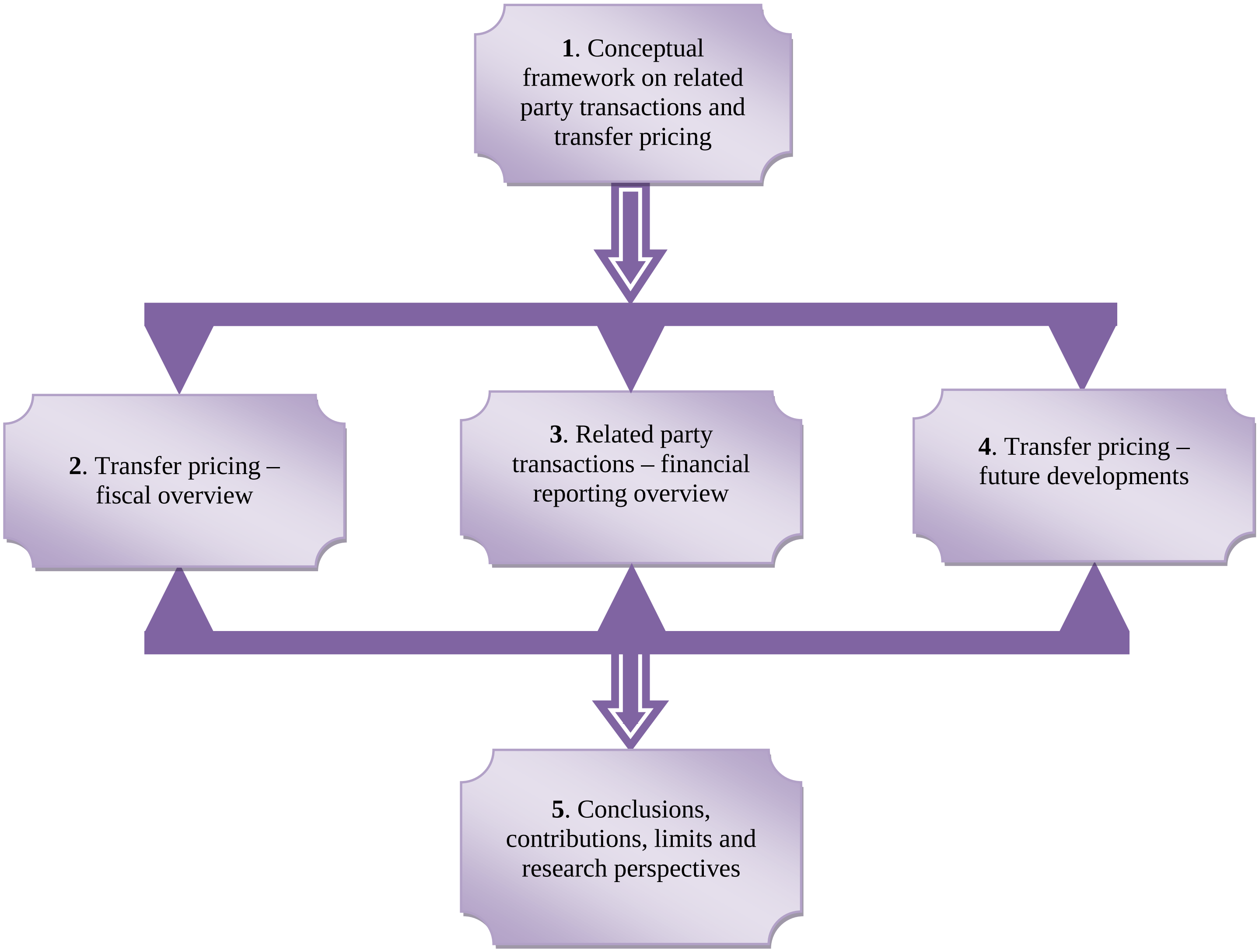
Therefore, the main objective of this scientific endeavor is the *development on related party, focusing on transfer pricing*. This field is of a relatively new importance for Romanian market (interest shown at the beginning of XXI century, after 2000), but it is highly debated and analyzed in developed countries since the second half of the twentieth century (primary variantes on transfer pricing legislation have been in force since the first half of the twentieth century in the UK - 1915 and USA - 1917).

This *fundamental objective is decomposed into four operational objectives* which have been achieved individually in the first four chapters of this study (the last chapter is dedicated to the presentation of the final conclusions, the contributions, limitations and the perspectives of research), as follows:

- ✓ *Objective 1*: Shaping the conceptual framework of related parties and transactions carried between them, with focus on transfer pricing issues, by relying on the results of previous academic research.
- ✓ *Objective 2*: Presentation and analysis of key aspects of transfer pricing regulations from a tax point of view, on three subsequent levels, namely: international, European and national.
- ✓ *Objective 3*: Presentation and analysis of key aspects of financial – accounting regulation on related party existing at international, European and national levels, and also testing the compliance of Romanian companies with these regulations.
- ✓ *Objective 4*: Presentation of the directions in which the regulations on transfer pricing at international, European and national level is possible to be developped, and also evaluating the perception of Romanian professionals on transfer pricing.

In view of the above, the structure of the thesis can be illustrated as follows

Figure 2. Thesis structure



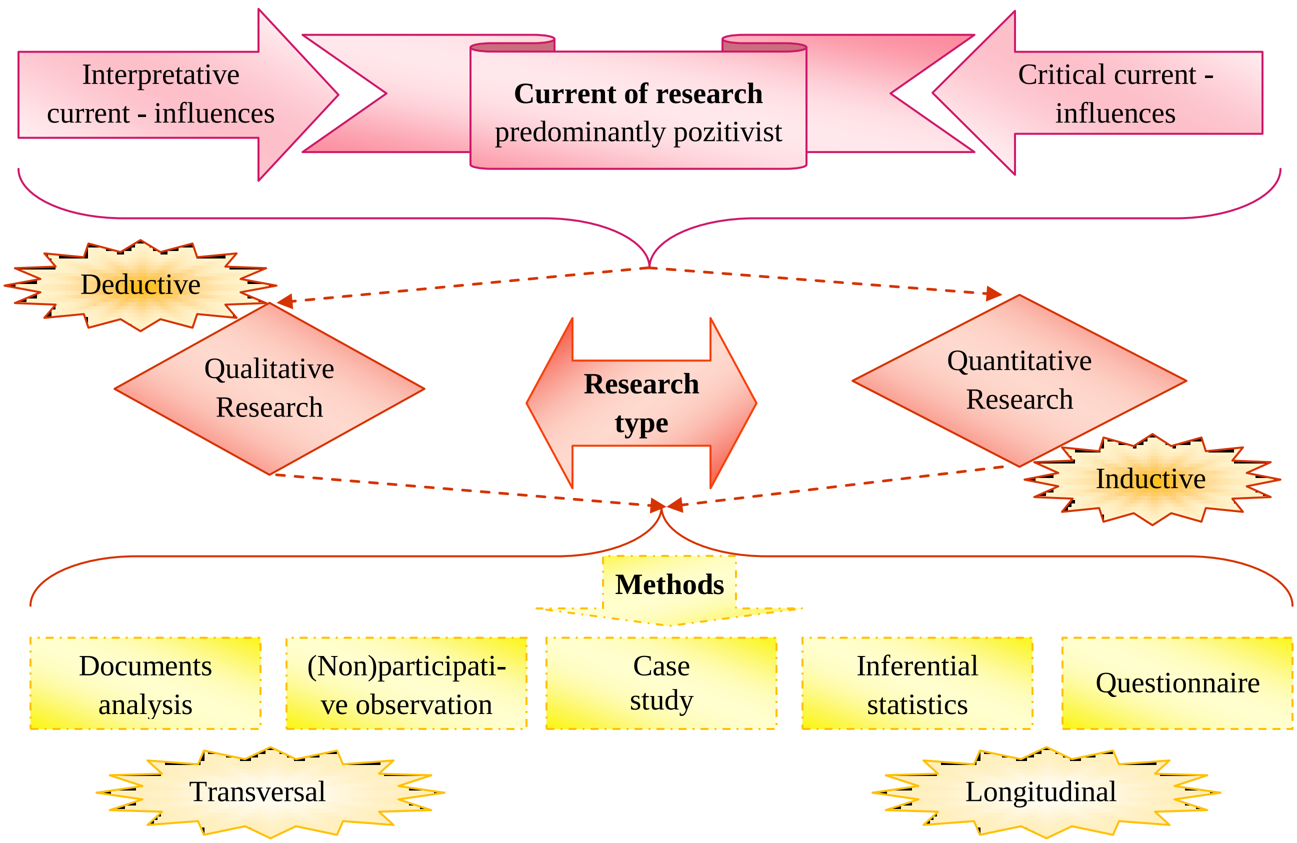
Source: realized by author

RESEARCH METHODOLOGY

Any scientific approach is based on a specific research methodology that includes methods, techniques, procedures and tools used to achieve the proposed objectives.

As regards the present study, it was structured in such a way that the research methodology used to achieve the four operational objectives has been presented in detail in each chapter, which treats all by such an objective. This structure was chosen with the intention to highlight more clearly the relationship between the proposed objective, assumptions, methodology and results. The figure below shows the overall synthesis of the research methodology used to achieve the fundamental objective set at the beginning of this scientific endeavor.

Figure 3: Research methodology - synthesis



Source: realized by author

SYNTHETIC PRESENTATION OF THE CONTENTS OF THESIS CHAPTERS

The aim of the **first chapter** of thesis was to shape the conceptual framework of related party transactions (by one side) and transfer pricing (by the other side) by reference to scientific literature.

To reach that goal, it was outlined, first, a sample of scholarly articles in the literature, which was then subject to quantitative and qualitative analysis.

With regard to ***related party transactions***, they are perceived in the literature as a "double-edged sword," according to two opposite theories. One is *the efficiency theory*, according to which related party transactions are economically efficient, favoring the economies of scale, the reduction transaction costs, the increase of operational and financial profitability, the increase of return on assets, the increase of competitiveness, the risk reduction, the optimal allocation of internal resources etc. On the other hand, according to *the theory of conflict of interest*, related party transactions are considered harmful, favoring the expropriation of minority shareholders by the majority shareholders, the handling of financial results for various purposes, the misappropriation of assets, the overstatement of profits. To facilitate the propagation of beneficial effects associated with intra-group transactions and to counter the negative ones, the regulators and supervisors in the field should adopt a *contingent approach* in which these two theories coexist. In this way, the related parties transactions would be supported and their associated risks would be reduced, while the costs of monitoring requirements would not increase unduly.

With regard to ***transfer pricing***, they are analyzed in the literature from two different perspectives. The *economic perspective* address transfer pricing from a technical point of view, separating them from political and economic context in which they are developed and used. According to this view, transfer prices are instruments of resource allocation within the group, using both for MNE coordination, in order to achieve the proposed objectives, and as well for the performance appraisal of subsidiaries / managers (they are therefore used for internal purposes). ***Fiscal perspective*** seeks to outline the tools to be implemented in order for the transfer pricing to not deviate from market values and to not distort competition and tax base in the various jurisdictions in which a multinational operates (thus, they are used for external purposes). Even though there are arguments that support economic - tax decoupling (such as: tax prices are dominated by regulations and do not have the ability to capture the economic implications, or tempering the performance – tax relationship) and legislation allowing such release (e.g. USA) in practice, the economic and fiscal transfer pricing are highly integrated (due to simplicity, to the higher costs involved by two sets of reports, or to avoid the authorities to obtain information that can be used to reclassify transactions).

Therefore, related party transactions and transfer pricing that they behave is a multidisciplinary area of study (economics, accounting, taxation, corporate governance, audit, finance, marketing, legal science, international relations, etc.) involving many actors (corporations, accountants, governments, international organizations, lawyers, consultants, etc.). Apart from the complexity, difficulty and the level of knowledge or information that the effective management of related party transactions and transfer pricing requires, we conclude by quoting Rosenthal (2008), according to which the natural lens of these processes have to be the *correctness.*

The aim of the **second chapter** was the presentation and analysis of key aspects of the area of transfer pricing regulations existing on three subsequent levels, namely international, European and national.

At ***international level***, the OECD Guidelines on transfer pricing is the main tool recognized by most states, which provide essential information and advice on how to set the transfer pricing for tax purposes. The report was first presented in 1979, was updated and adopted in 1995 and then re-updated in 2010.

The cornerstone behind this guide is the arm's length principle (en. Arm's Length Principle - ALP), whereby, transactions between related parties must be conducted as if there were no affiliate relationship, i.e. by respecting the market value. This standard is based on the principle of separation of entities and focuses on the nature and characteristics (circumstances) of transactions.

The essence of ALP principle is represented by the comparation of controlled transactions with similar independent transactions (a process called "comparative analysis"). The indicators that are to be compared are the price or profit margin (gross or net). Depending on the availability of relevant information for the analysis, comparable independent transactions may be internal or external. The most important factors analyzed during the comparative analysis are: the characteristics of goods / services, the functional profile of entities (including assets, risks, functions), the contractual terms of transactions, the business strategy, the economic circumstances. The importance of these factors depends on the method used for determining transfer pricing, method which in turn depends on the availability of relevant information. The OECD Guidelines recognize five methods for determining transfer pricing, divided into two categories: traditional transaction methods (CUP, CPM, RPM), which requires a higher degree of comparability and transactional profit-based methods (TNMM, RPM). The purpose of the comparative analysis is to identify the range of the market which is in fact the range of values of price / profit of comparable transactions conducted by independent comparable companies.

The OECD report contains recommendations on transfer pricing documentation and their administration by the competent authorities (including aspects of APA procedure). The guide also includes details of some transactions considered most problematic in terms of transfer pricing, due to their substance and ambiguous characteristics - it is about transactions involving intangible assets, services, cost sharing arrangements, business restructuring.

At ***European level***, the European Commission attaches great importance to the transfer pricing because they have the ability to influence the functioning of the internal market. The Commission acknowledges the OECD work in this area and is a supporter of the principle of market value. The EU Member States have concluded an arbitration agreement which is a tool for eliminating double taxation arising on transfer pricing adjustments made by the tax authorities with the purpose to comply with ALP principle. In order to find solutions to help the practical implementation of arbitration convention, the European Commission proposed, in 2002, the establishment of an European Forum on transfer pricing. Since then, the Forum agenda widened, and it seeks to find pragmatic solutions to problems involved during the practical application of transfer pricing rules within EU. The Forum has issued numerous reports on various aspects of transfer pricing and, at its recommendations, the Council adopted two codes of conduct regarding TP (one on the application of the arbitration convention and one on transfer pricing documentation).

The European Commission proposed, in 2011, a model for a Directive on a common consolidated tax base, which aims to consolidate the tax base of group companies withn the EU. So far Member States have not reached a consensus on the adoption of the Directive, most of them arguing that the project do not comply with subsidiarity principle, restricts their sovereignty on direct taxes matters and results in a reduction of tax revenues. As far as the draft directive will be approved in the future, the transfer pricing formalities for tax purposes will disapear for entities that are part of a tax group under the Directive.

At ***national level***, the transfer pricing tax legislation follows the OECD principles and it has been implemented relatively recent. The detailed regulations and methodology for transfer pricing setting were introduced in the Romanian legislation only in 2004, with the entry into force of the Tax Code and its Implementing Norms. The Romanian legislation contains provisions on transfer pricing documentation (which follow the principles of the EU Code of Conduct in this area) and the procedure for issuance of advance pricing agreements. If authorities conclude that a transaction carried out between related parties does not respect the market value, they have the right to adjust the proceeds from the transaction and tax them accordingly with a 16% profit tax rate (plus interest and late penalties).

Although the domestic legislation in the area of transfer pricing has developed quite a lot in the last period, we consider that it should be deepened by adding at least the following aspects: i) the minimum threshold above which is necessary to prepare transfer pricing documentation (for to avoid any uncertainty and unnecessary costs) and ii) the introduction of annual tax reporting requirements on transfer pricing (to facilitate the assessment of risky transactions from the tax authorities side).

It should also be noted that transfer pricing regulations is a dynamic area, continuously updated by the competent bodies at international, European and national level to meet the changing realities of the globalized economy. On the other hand, as mentioned in the OECD report, tax transfer pricing is not an exact science, but rather is based on professional judgment in conjunction with knowledge of at least: TP legislation, operational activities of the entity analyzed and transaction specificity for which transfer pricing under market value principle are to be determined.

The aim of the **third chapter** is the presentation and analysis of accounting regulations on related party at international, European and national level, and, as well, testing the compliance of Romanian companies with these regulations.

Therefore, in ***the first part*** of the chapter there were analyzed the provisions of international accounting standard IAS 24 - Related parties disclosures. Moreover there were presented the evolution and development of this standard and the similarities and differences between this standard and other international standards on the same topic (U.S. GAAP - ASB 850, JP GAAP - Statement 11). Then, we analyzed the existing regulations on related parties at European level and at national level.

As regards the domestic legislation, there was tested the level of formal harmonization between privisions of IAS 24 and the two Romanian rules governing accounting practices - OMF 3055/2009 for adoption of accounting regulations compliant with European Directives, respectively OMF 1286/2012 for approving the Accounting Regulations in accordance with international Financial Reporting standards applicable to companies whose securities are admitted to trading on a regulated market. Following this analysis it was concluded that the similarity of the first normative act with IAS 24 is 69% and the similarity of the second act is of only 12% (a paradoxical result, given that the purpose of this rule is even approval in accordance with IFRS regulations, and it was expected that the provisions regarding the related parties to be much closer to the requirements of IAS 24).

In the ***second part*** of the chapter, there was conducted an empirical study on Romanian companies listed on BVB in order to test the extent to which they exhibit, in the annual financial reports, information on related parties as required by IAS 24. In the same time, there was tested the level of information regarding the transfer pricing presented by the analyzed companies in their annual reports (despite the fact that there is no law requiring disclosure of such information).

Therefore, for each company in the sample and for each year of the study (2008 - 2012), there was calculated a disclosure index (DI) by quantifying the elements binding to be presented in accordance with IAS 24 versus actual items presented by the analyzed companies. For this index there was calculated the *annual value* (DI for each company and for each year), the *aggregate value* (arithmetic mean of five years DI for each company), the *synthesized value* (arithmetic mean of DI values for each year and for all companies together) and the *global value* (arithmetic mean of DI for all companies and all years together).

The analysis results show that there are companies that, in some years, do not disclose any information regarding related parties, or disclose very little detail (DI value 0 or 0.06), but at the same time there are a lot of companies disclosing many aspects regarding their related parties (DI 0.84 value). On the other hand, the survey results clearly illustrate the evolution of disclosures regarding related parties during the period analyzed, as the DI values increased steadily between 2008-2011. In 2012 there was again a paradoxical result, because the value of DI decreased slightly from the previous period (by 0.02 points). This decrease is unexpected, even abnormal, especially considering that in 2012 all companies have prepared financial statements under IFRS referential, and normally the value of DI was expected to increase. During the collection of information from financial reports, it was noted that in 2012, compared to 2011, companies that have been reporting under IFRS financial statements have changed the template, giving more lengthy information on general accounting policies and on aspects regarding the application of IFRS, but failed to pose some information on related parties (it is about especially on information regarding the management remuneration term - specifically, companies have not included anymore the phrase stating that they did not pay pension obligations for management or not granted loans, guarantees or other benefits thereof).

In the second phase of the empirical study, we used the inferential statistics (correlation analysis and simple and multiple linear regression) to verify the dependency of disclosure index regarding related party on quantitative and qualitative factors, such as: turnover, total assets, net financial result, net assets, capital origin, nature of capital, shareholding structure, category listing on the stock exchange, the accounting referential on which financial statements are prepared, the quality of external auditors. The results of the analysis indicate that, in general, there is a medium to low correlation between the disclosure index and the ownership structure, on the one hand, and the quality of the external auditors, on the other hand, while between the other factors referred to above and DI there is no correlation.

As regards information on transfer pricing, more than half of the analyzed companies make no reference to this issue. The remaining companies make general references, such as the existence of transfer pricing legislation in Romania, and certain companies mentioned some more specific aspect, such as declaring that the transfer pricing practices followed market values, indicating the methods used for determining transfer pricing etc. In the same time, the statistical analysis revealed that there is a medium correlation between the disclosures index on related parties and the disclosures on transfer pricing.

The objective of **chapter four** was, on the one hand, the presentation of directions in which it is possible to develop transfer pricing regulations on international, European and national level, and on the other hand, the presentation of Romanian professionals perception on certain transfer pricing issues.

Thus, ***in the first part*** of the chapter, there was presented the report known in the literature and specialty practice by the acronym BEPS - "Base Erosion and Profit Shifting". This report was issued by the OECD in February 2013 at the initiative of the G20 leaders following the June 2012 meeting and in July 2013 there was issued an Action Plan to implement BEPS.

As evident from its title, the goal of this report and its related action plan is to eliminate opportunities for erosion of the tax base and for profit shifting. Such possibilities are currently available to multinationals through apparently legal techniques (but non - ethical) that are favorable to their approach to pay taxes as low, much lower compared to the operations they carry out.

Four of the 15 actions of action plan are related to transfer pricing, and their completion will result in significant changes in OECD Guidelines. These actions include the alignment of tax paid with the operations performed in each jurisdiction, or, in other words, the economic substance of transactions (focusing on intangible assets used, the actual risk assumed and the level of capitalization required). In addition, the principle of transparency is likely to bring additional obligations for taxpayers regarding transfer pricing documentation. Specifically, they will have to provide to the tax authorities a holistic picture of a group’s operations performed globally by providing, in a required template, certain types of information (global income allocation, economic activity carried out in other jurisdictions, taxes paid in other states, etc.).

As many officials mentioned, BEPS project has the ability to significantly change the fundamental principles of international taxation. Naturally, changing international regulations on transfer pricing will determine the subsequent change of European and national regulations in the field.

Regarding the practical approach of the Romanian authorities on transfer pricing, this is a major objective of NAFA medium term strategy for 2012-2016. In the same time, it appears that the level of knowledge in the field of tax inspectors has increased significantly, the number of tax inspections on the subject is also the ever-growing, the same the transfer pricing adjustments made in order to align them with the market values (so far, the biggest adjustment made by the authorities in Romania was EUR 30 million).

In ***the second part***, there was conducted an empirical study (through a questionnaire) on Romanian specialists in the financial – accounting field (CCF, CAFR and CECCAR members) in order to assess their perception on certain transfer pricing issues. The questionnaire was constructed using the funnel technique (which involves moving from general to specific) and the 19 questions were grouped into four distinct categories of information (general information about the respondents, information on domain knowledge, information on technical aspects of transfer pricing, information on the Romanian legislation in the field).

The interpretation of responses obtained showed that most respondents have been working in the area of financial advisory services / tax / accounting, and have a work experience of over 15 years (aspects that provide us with a certain level of assurance as regard the quality of responses).

As regards the personal knowledge on transfer pricing, most respondents evaluate themselves as having medium knowledge in this area, while in a national context the knowledge is regarded as weak. In the same time, according to the responses received, the attendance on courses / seminars on transfer pricing depends on the professional organization in which respondents are part (most of CCF members attended training courses at the initiative of the respective chamber, while the majority of the CAFR and CECCAR members did not attend courses in the area and those who followed made it on own initiative). Furthermore, respondents believe that, for their professional development, it is useful to attend training courses and, as well, professional organizations should be involved in the training of specialists in the area of transfer pricing.

Moreover, respondents considered that transfer prices are important in the global business strategy and that, at the same time, these prices may be used as tools to manipulate the fiscal result. In their view, the most important factors that have the ability to counteract the transfer pricing handling for tax purposes are the legal regulations and the transparency of financial – accounting practices. The most important external factors causing difficulty of transfer pricing determination is the lack of detailed guidance and the lack of necessary technical knowledge while internal factors include: the lack of comparable transactions and the business features. The respondents believes that, in order to achieve a complete transfer pricing documentation, the process of its preparation should involve both specialists in the finance department and specialists from operational departments. As regards the Romanian companies, the professionals surveyed believe that they do not treat with sufficient attention the issues relating to transfer pricing and also that they are not able to provide clear and sufficient information on the prices they used in dealing with affiliates. However, the most important factors determining the companies in Romania to give importance on transfer pricing issues are the legislative regulations followed by the group policies.

As regards the Romanian legislation in the field, most respondents believe that as it stands, this is ambiguous and far too brief. In the same time, the respondents are of the opinion that the authorities in Romania do not have enough technical knowledge in the area of transfer pricing, that they have an attitude as abusive and apply the form of the law, not its substance. Most respondents belonging to the CCF and CECCAR believe that the obligation to prepare annual tax reporting relating to transfer pricing would not be beneficial, while most respondents from CAFR considered such a measure as beneficial. On the other hand, almost all respondents believe that the minimum threshold on the value of transactions under which the existence of transfer pricing file is not required would be an efficient legislative measure.

The last chapter, fifth, aimed to present the overall conclusions of the scientific approach which we are committed to, the own contributions that we believe we have manage to bring in the knowledge on related party and transfer picing field, the research limitations and the future prospects of research in this complex area. These issues are discussed in the next section – „conclusions, contributions, limitations and research perspectives”.

CONCLUSIONS, CONTRIBUTIONS, LIMITS AND RESEARCH PERSPECTIVES

General conclusions

As it was mentioned at the beginning of this paper, the primary objective of this initiative was to develop and deepen the knowledge on related party relationships, focusing on transfer pricing, goal which was achieved through the four operational objectives: i) a current state of knowledge in the field, ii) presentation and analysis of transfer pricing tax regulations iii) presentation and analysis of regulations in the field of financial-accounting reporting on related party, iv) presentation of directions in which it is possible to develop the regulations in the field of transfer pricing.

The first operational objective was achieved by analyzing academic research in our area of interest at the international level (as national literature in the field is less developed, since issues on related party transactions, respectively on transfer pricing, represent interest for local regulators and researchers from a relatively recent period of time - especially after year 2000), while for the following three objectives there were considered issues specific to our interest area existing at international, European and national level.

Each operational objective was developed under a different chapter, resulting in four chapters, which together converge towards the achievement of the fundamental objective and finalize the research that we have undertaken.

Therefore, in the first chapter there was defined the conceptual framework on related party transactions and on transfer prices by reference to scientific literature. Firstly, there was shaped a sample of articles by searching in three scientific databases using the terms "related party transactions" and "transfer pricing", sample which was then subjected to quantitative and qualitative analysis. It was noted that related party transactions are perceived as a "double-edged sword," according to two diametrically opposed theories: the theory of efficiency (these transactions favoring economic development) and the theory of conflict of interest (that transactions are harmful to economic progress). In order for the beneficial effects of related party transactions to be propagated and the negative ones to be offset, the solution lies in the adoption of a contigent approach, where the two theories to coexist. Transfer prices are analyzed in the literature from two different perspectives: economic perspective (which invloves a technical approach and separe these prices from the political and economic context in which they are used) and fiscal perspective (which is trying to develop tools in order for the transfer pricing to not deviate from market values). In practice, these two approaches are highly integrated.

In the *second chapter* there was analyzed the main aspects of transfer pricing tax regulations. Internationally, the OECD transfer pricing guide provides the essential information and guidance for determining transfer prices under free market rules. This guide is built around the fundamental principle of the market value (i.e. arm's lenght principle), according to which the related party transactions should be conducted as if there were no affiliate relationship. This principle focuses on the nature and circumstances of the transaction and its application is based on the comparative analysis which generally takes into considerations five factors: characteristics of the goods / services, functional profile (active, risk, functions), terms of trade, business strategy, economic circumstances. The importance of these factors depends on the method chosen for determining transfer pricing (CUP, CPM, RPM, TNMM, PSM), which in turn depends on the availability of relevant information. At European level, the European Commission recognizes the work of the OECD in the field of transfer pricing, and plans not to double the OECD efforts, but trying to find pragmatic solutions for practical application of OECD principles within the European Community. Nationally, transfer pricing legislation has been implemented recently, however, both the legislation and knowledge of the tax authorities in the field have been developed a lot lately. This fact emerges from the case study as well, which compares the transfer pricing legislations of Romania and Poland, showing that there are no differences between the core principles implemented in these two legislations.

In the *third chapter* there were analyzed the key aspects of regulations on financial reporting regarding the related party relationships and transactions. The international standard that outlines how to report these types of relationships and transactions is IAS 24 – „Related party disclosures”. This standard is recognized at European level and adopted gradually at national level. After testing the degree of formal harmonization of IAS 24 and OMF 3055/2009, respectively OMF 1286/2012 , it was concluded that the similarity of the first piece of legislation with the international standard is 69 % and the similarity of the second law is only 12% (an abnormal result, because the purpose of this rule is actually the Romanian regulatory approval in accordance with IFRS, and there was expected that the provisions regarding the related parties to be much closer to the requirements of IAS 24). After the empirical study conducted on Romanian companies listed on BVB (by taking into account the financial reports prepared by them for the last five years, i.e. 2008 to 2012) it was concluded that, overall, the disclosure requirements of IAS 24 in respect of related parties are observed on a medium level (overall DI = 0.42 points). In the meanwhile, the factors influencing somewhat disclosure of such information is the shareholding structure and the quality of auditors, while factors such as: turnover, total assets, net financial result, net assets, capital origin, nature of capital, listing category, accounting referential, have no influence on the level of information on related parties disclosed by the analyzed companies in their financial reports. On the other hand, over half of the companies in the sample make no reference to their transfer pricing practice, some of these make general references on the transfer pricing legislation and some companies present certain more concrete aspects (the compliance with market value, the method used to determine transfer pricing). At the same time, the study conducted reveal the fact that there is a medium correlation between the related party disclosures index and the information on transfer pricing presented by companies in their financial reporting.

In the *fourth chapter* there were presented the directions in which it is possible to develop the transfer pricing regulations. Internationally, the OECD is working to eliminate the potential for erosion of the tax base and profit shifting. In this regard, in 2013 there were issued the report and the related action plan collectively known as BEPS („Base Erosion and Profit Shifting”), whose implementation will have significant effects on the transfer pricing regulations. At European level, given that the European Union recognizes the OECD work in this area, is more than certain that the BEPS project will significantly influence the Community rules on transfer pricing. Finally, the changes that will take place at international and European level in the field of transfer pricing will be reflected, naturally on the national regulations. In terms of perception of specialists from Romania on transfer pricing issues, from the empirical study conducted among members of the CCF, CAFR and CECCAR there was concluded that the professionals indicate their level of knowledge in the field is a medium one, and thd evel of knowledge in a national context as a weak one. Moreover, the respondents consider that transfer prices are used as mechanisms for handling tax income, and, among the most important factors that have the capacity for countering such practices are the legal regulations and the transparency of financial-tax practices. Difficulty of determining the correct transfer pricing is due to external factors (lack of detailed guidance, lack of technical knowledge in the field) and to internal factors (absence of comparable transactions, business characteristics). As regards the companies from Romania, according to experts interviewed, they do not pay enough attention to transfer pricing and are not able to provide clear and sufficient information on prices used in affiliates dealings. However, the most important factor determining the Romanian companies to provide some importance to transfer pricing is the legislative requirements. Notwithstanding the above, as regards the Romanian legislation, the respondents consider it ambiguous and too brief. A potential modification such as the introduction of the obligation to prepare annual tax reporting on transfer pricing is seen as non-beneficial by the respondents, while a set threshold below which the supporting documentation is not needed is perceived as an efficient measure.

In conclusion, related party transactions and transfer pricing is not only a complex and delicate field, but also a dynamic one, continuously updated by the competent bodies to suit the changing realities of the globalized economy and to eliminate the negative effects, which, due to intrinsic characteristics, it can have on the society as a whole.

Own contributions

In this section there will be presented the added value that we believe we managed to bring on the knowledge on the related party transactions and transfer pricing.

Thus, the major contributions brought *at the conceptual level* refer to:

- ✓ Through the study on international scientific literature there was gleaned the following: i) related party relationships are addressed in the literature in terms of two opposing theories, namely the theory of efficiency and the conflict of interest theory, in practical approach these theories should coexist ii) transfer pricing are analyzed through two persectives, namely economic perspective and fiscal perspective perspective, in practice, these are highly integrated.

- ✓ Presentation and analysis of conceptual approaches to transfer pricing existing at international, European and national levels. We believe that the way we analyzed the main tools of transfer pricing regulations (arm's length principle, comparative analysis, indicators compared, the methods of transfer pricing, etc.) by providing examples that simulate real situations allows practitioners the opportunity to become familiar with these concepts, thus facilitating their practical application.
- ✓ Making a radiography of the Romanian legislation on transfer pricing by reference to the Polish law in the same area, which revealed the aspects that should be improved in the Romanian legislation.
- ✓ Presentation and analysis of conceptual approaches regarding financial reporting on related party relationships and transactions, existing at international, European and national levels.
- ✓ Presentation of possible directions for the development of regulations on transfer pricing on international, European and national levels.

At *an empirical level*, the main contributions made by this scientific approach refers to:

- ✓ Through analysis on the level of accounting harmonization (using Jaccard coefficients) of IAS 24 and Romanian accounting rules on related party was established that the degree of similarity between MoF Order 3055/2009 and IAS 24 is 69%, while degree of similarity between MoF 1286/2012 and IAS 24 is only 12% (an abnormal and unexpected result).
- ✓ Through the study performed on companies listed on the BVB there was made a radiography of the practice of Romanian companies regarding disclosure on related parties in their annual reports.
- ✓ The same study delineates the factors that influence the ability of disclosures on related party in annual reports.
- ✓ Moreover, the study provides a picture of the practice of Romanian companies regarding disclosure on transfer pricing in their annual financial reports.
- ✓ Through empirical study on Romanian professionals in finance - accounting field there was made an overview of their perception about the area of transfer pricing, focusing on the following: the level of knowledge, technical aspects and issues related to transfer pricing legislation.

In conclusion, we dare to believe that the fundamental objective set at the beginning of this research, namely the development and deepening the knowledge on related party relationships, focusing on transfer pricing, has been reached.

Limits

Any scientific approach involves, in addition to the significant contributions that it can brought to the knowledge in the area of interest, certain limitations that are inherent. In this case, we believe that the main limitations of the scientific approach conducted by us are as follows:

- ✓ Because the literature in the field is extremely vast, making a comprehensive study was impossible, which is why it was created a methodology for limiting the scope of analysis to achieve the proposed objective. Moreover, due to the inherent subjectivity of the researcher, it is possible that some articles of the sample have been classified incorrectly in certain categories of analysis (e.g. field, research topic, research perspective).
- ✓ Analysis of key aspects on: transfer pricing, financial reporting on related party relationships and transactions, possible directions for development of regulations on transfer pricing may be influenced by the inherent subjectivity of the researcher.
- ✓ Making a radiography of Romanian legislation in the field of transfer pricing compared to many state laws would help in drawing several shortcomings of the Romanian legislation, and therefore the proposal of several solutions for improvement (we limited the comparison with Polish law for lack of space, to not expand research too long and to not get bored).
- ✓ The empirical study on the Romanian companies was limited to the availability of information required (although the initial sample was 70 companies, for each year of the five years analyzed, there were some companies for which the needed information was unavailable).
- ✓ The results of empirical study conducted on the Romanian specialists in the financial - accounting field may not be representative, given that the response rate is quite small compared to the actual number of emails succesfully sent. Moreover, the questions are general in nature because we wanted to avoid requiring a great effort from the respondents (and thus obtaining a possible response rates even lower).

Finally, we express our conviction that the fundamental objective of the research, namely the development and deepening the knowledge on related party relationships, focusing on transfer pricing, was not jeopardized, essentially, by the limits shown above.

Research perspectives

Regarding prospects for future research in this area, they are largely related to the desire to annihilate the limits of the research presented in the previous section. Therefore, we believe that in the future, further research could be carried out, such as:

- ✓ Extending the study on the literature, possibly outlining a targeted strategies that take into account, from the start, only articles stated by reference to transactions between related parties, respectively transfer pricing (possibly starting from topics of the journals where the articles are published).
- ✓ Make a radiography of transfer pricing Romanian legislation by comparing it with transfer pricing legislation of several countries (possibly with legislation of all 28 EU Member States, or with that of the OECD Member States, or with that of the first 10 to 20 countries around the world considered to have the most developed legislation in this area) in order to propose effective solutions to improve the Romanian legislation, starting from the experience of other countries.
- ✓ Extending the study on related party disclosures in the financial statements on a larger sample of companies, by including in the research companies listed on Rasdaq, or create a sample that includes the top 50 companies (based on indicators and net turnover and operating profit) of each county in Romania, or, why not, expanding research on foreign companies that are located in certain countries or certain listed on capital markets.
- ✓ Extending the study regarding the level of information on related parties presented in the financial statements by including new influence factors such as operating industry, quality of management, etc.
- ✓ Replication of the study on related parties disclosures in the financial statements in the same form, but for the next two to three years following 2012 in order to dinamically evaluate the impact of adopting IFRS on disclosures made by the Romanian companies.

- ✓ Development of some research in order to determine the factors that would have the ability to compel companies to comply with the requirements of IAS 24 regarding the disclosures on related parties.
- ✓ Extending the sudy on perception of Romanian professionals on transfer pricing issues by developing more technical questions to assess the practical difficulties and to propose possible solutions to address them.
- ✓ Carried out certain studies in order to assess the impact of BEPS to the regulation and practice of transfer pricing.

Finally, we wish to express our belief that the many research perspectives outlined above merely reiterate once again that the related party transactions and transfer pricing is a complex and vast filed, being an inexhaustible source of research due to the major influence that it has on the development of businesses and, in a last instance, on the development of the society as a whole.

REFERENCES

A. Articles

1. AICPA (2000), Official Releases - Statement on Quality Control Standards Nos. 4 and 5…SOP 00-1 Audit Interpretations…Ethics Interpretation, *Journal of Accountancy*, May 2000;
2. Agarwal James, Wu Terry (2004),China's entry to WTO: global marketing issues, impact, and implications for China, *International Marketing Review*, Vol. 21, no. 3: 279 – 300;
3. Alawattage Chandana, Hopper Trevor, Wickramasinghe Danture (2007), Introduction to management accounting in less developed countries, *Journal of Accounting & Organizational Change*, Vol. 3, no. 3: 183 – 191;
4. Angus Barbara, Neubig Tom, Solomon Eric, Weinberger Mark (2010), The U.S. International Tax System at a Crossroads, *Tax Notes*, 517 – 550.
5. Arya Anil, Mittendorf Brian (2007), Interacting Supply Chain Distortions: The Pricing of Internal Transfers and External Procurement, *The Accounting Review*, Vol. 82, no. 3: 551–580;
6. Arya Anil, Mittendorf Brian (2008), Pricing Internal Trade to Get a Leg up on External Rivals, *Journal of Economics & Management Strategy*, Vol. 17, no. 3: 709–731;
7. Azizan Siti Sakinah, Ameer Rashid (2012), Shareholder activism in family-controlled firms in Malaysia, *Managerial Auditing Journal*, Vol. 27, no. 8: 774 – 794;
8. Bailey David, Harte George, Sugden Roger (2000), Corporate disclosure and the deregulation of international investment, *Accounting, Auditing & Accountability Journal*,Vol. 13, no. 2: 197 – 218;
9. Balachandran R. Kashi, Li Shu - Hsing, Wang Taychang, Wang Hisao – Wen (2008) The Role of Transfer-Pricing Schemes in Coordinated Supply Chains, *Journal of Accounting, Auditing and Finance*, 375 – 404;
10. Baldenius Tim, Rechelstein Stefan (2006), External and Internal Pricing in Multidivisional Firms, *Journal of Accounting Research*, Vol. 44 no. 1: 1 -28;
11. Baldenius Tim, Rechelstein Stefan (2004), Integrating Managerial and Tax Objectives in Transfer Pricing, *The Accounting Review*, Vol. 79, no. 3: 591 – 615;
12. Bardy Roland (2006), Management control in a business network: new challenges for accounting, *Qualitative Research in Accounting & Management*, Vol. 3, no. 2: 161 – 181;

13. Barker B. William (2010), International Tax Reform Should Begin at Home: Replace the Corporate Income Tax with a Territorial Expenditure Tax, *Northwestern Journal of International Law & Business*, Vol. 30: 647 – 698;
14. Bastl Marko, Grubic Tonci, Templar Simon, Harrison Alan , Fan Ip-Shing (2010), Inter-organisational costing approaches: the inhibiting factors, *The International Journal of Logistics Management*, Vol. 21, no. 1: 65 – 88;
15. Bates Ken (2009), Handbook of Management Accounting Research, Volume. 2 2009, *Journal of Accounting & Organizational Change*, Vol. 5, no. 3: 430 – 433;
16. Beattie V. et al, (2004), A methodology for analysing and evaluating narratives in annual reports: a comprehensive descriptive profile and metrics for disclosure quality attributes, *Accounting Forum*, Vol. 28. no.3: 205–236;
17. Bernard B. Andrew, Jensen J. Bradford, Redding J. Stephen, Schott K. Peter (2010), Intrafirm Trade and Product Contractibility, *American Economic Review: Papers & Proceedings,* Vol. 100: 444–448;
18. Bernard B. Andrew, Jensen J. Bradford, Redding J. Stephen, Schott K. Peter (2009), Trade, Product Turnover and Quality - The Margins of US Trade, *American Economic Review: Papers & Proceedings* , Vol. 99, no. 2: 487–493;
19. Biondi Yuri, Giannoccolo Pierpaolo (2012), Complementarities and competition in presence of intangible resources: Industrial economic and regulatory implications, *Journal of Strategy and Management*, Vol. 5, no. 4: 437 – 449;
20. Blongien Bruce, Davies B. Ronald (2004),The Effects of Bilateral Tax Treaties on U.S. FDI Activity, *International Tax and Public Finance*, Vol. 11: 601–622;
21. Bonner E. Sarah, Hesford W. James,Van der Stede A. Wim, Young S. Mark (2006), The most influential journals in academic accounting, *Accounting, Organizations and Society*, 31 : 663–685;
22. Bradford F. Davis (2003), Addressing the Transfer-Pricing Problem in an Origin-Basis X Tax, *International Tax and Public Finance*, Vol. 10: 591–610;
23. Brem Markus, Tucha Thomas (2006), Transfer pricing: conceptual thoughts on the nature of the multinational firm, *Vikalpa*, Vol.31: 29-43;
24. Bremer C. Sven, Engler Gerhard (2004), Tightening of the German Transfer Pricing Documentation Requirements, *International Tax Journal*, 17 – 30;
25. Broomhall David (2007), Dynamic Adjustments in Transfer Pricing Agreements, *Business Economics*, April 2007: 22 – 33;
26. Bryceson P. Kim, Slaughter Geoff (2010), Alignment of performance metrics in a multi-enterprise agribusiness: Achieving integrated autonomy? *International Journal of Productivity and Performance Management*, Vol. 59, no. 4: 325 – 350;
27. Buckley J. Peter, Freknall Huges Jane (2001), Incentives to transfer profits: a Japanese perspective, *Applied Economics*, Vol. 33: 2009 – 2015;
28. Callow A. Michael, Lerman B. Dawn (2003), Consumer evaluations of price discounts in foreign currencies, *Journal of Product & Brand Management*, Vol. 12, no. 5: 307 – 321;
29. Campbell D., Slack R. *(2008)* Narrative Reporting: Analysts' Perceptions of its Value and Relevance, *ACCA Research Report* no.104;
30. Castro F.M. Leonardo (2011),Treatment of Synergy for Transfer Pricing Purposes: Code Secs. 367(d), 482 and 936 — A Critical Analysis Based on TAM 200907024 and the Obama Administration's Proposals, *International Tax Journal*, vol. September–October 2011, 39 – 64;
31. Catrina M.C., (2006), Prețurile de transfer, *Condeie Studențești*, 179 – 205;
32. Chen Ming-Yuan (2006), Managerial ownership and firm performance: an analysis using switching simultaneous-equations models, *Applied Economics*, Vol. 38: 161–181;
33. Chen Jean Jinghan, Cheng Peng, Xiao Xinrong (2011), Related party transactions as a source of earnings management, *Applied Financial Economics*, Vol. 21: 165–181;
34. Chen Yenpao, Chen Chien-Hsun, Chenc Weiju (2009), The impact of related party transactions on the operational performance of listed companies in China, *Journal of Economic Policy Reform*, Vol. 12, no. 4: 285–297;
35. Chong Sebanstan, Graeme Dean (1985), Related Party Transactions: A Preliminary Evaluation of SFAS 57 and IAS 24 Using Four Case Studies, *ABACUS*, Vol. 21, no.1;
36. Christensen A. John (2004), Discussion, *German Economic Review*, Vol. 5, no. 2: 231–235;
37. Cnossen Sijbren (2003), How Much Tax Coordination in the European Union? *International Tax and Public Finance*, Vol. 10: 625–649;

38. Cock Robert, French Nick (2001), Internal rents and corporate property management: A study into the use of internal rents in UK corporate organizations, *Journal of Corporate Real Estate*, Vol. 3, no. 3: 270 – 285;
39. Cooke T. E., (1989a), Disclosure in the corporate annual reports of Swedish companies, *Accountingand Business Research*, Vol 19, no 74: 113–124;
40. Cooke T. E., (1989b), Voluntary corporate disclosure by Swedish companies, *Journal of InternationalFinancial Management and Accounting*, Vol. 1, no 2: 171–195;
41. Convery Shawn (2003), Keeping banks competitive: a foundation for robust performance management, *Balance Sheet*, Vol. 11, no. 3: 38 – 41;
42. Cornett Michael, Reedy Adam (2012), Outbound Asset Transfers - Partnerships Make Unrelated Related for Subpart F Purposes, *International Tax Journal*, Vol. March–April 2012: 15 – 55;
43. Corlaciu A., Tiron - Tudor A., (2011), Related Party Transactions - Overview, *Annales Universitatis Apulensis Series Oeconomica, Faculty of Sciences, "1 Decembrie 1918" University, Alba Iulia*, No. 13, Vol. 2, p.241:248;
44. Corlaciu A., (2013), Business Models for Tax and Transfer Pricing Purposes, *The Annales of the University of Oradea, Economic Sciences, TOM XXII*, No. 1, p.1182:1189;
45. Corlaciu A., Tiron - Tudor A., (2013), Investigation about the complex of related party transactions, *EuroEconomica*, No.3, Vol.32, pp. 63 – 79;
46. Corlaciu A., Tiron - Tudor A., (2013), Cercetare privind îndeplinirea cerinţelor IAS 24 – „Prezentarea informaţiilor referitoare la părţile afiliate” de către companiile listate la BVB, *Revista CAFR* (acceptat spre publicare în Numărul 11 – Noiembrie 2013);
47. Corlaciu A., Tiron - Tudor A., (2013), Cercetare privind factorii care au capacitatea de a influenţea nivelul prezentărilor de informaţii referitoare la părţile afiliate conform cerinţelor IAS 24, *Revista CAFR* (acceptat spre publicare în Numărul 12 – Decembrie 2013);
48. Corlaciu A., Tiron - Tudor A., (2013), Cercetare privind percepţia profesioniştilor din România din domeniul financiar – contabil referitoare la unele aspecte specifice preţurilor de transfer, *Revista CAFR* (acceptat spre publicare în Numărul 1 – Ianuarie 2014);
49. Corlaciu A., Tiron - Tudor A., (2013), Gradul de armonizare al legislaţiei contabile româneşti privind părţile afiliate cu prevederile IAS 24, *Revista CECCAR* (acceptat spre publicare);
50. Corlaciu A., Tiron – Tudor A., (2013), Transfer Pricing – a literature review, *Emerging Markets Queries in Finance and Business Conference, Petru Maior University of Târgu – Mureş* (acceptat spre prezentare în cadrul Conferinţei, 24-27 octombrie 2013);
51. Crowther David, Carter Chris (2002), Legitimating irrelevance: management education in higher education institutions, *International Journal of Educational Management* , Vol. 16, no. 6: 268 – 278;
52. Curtis L. Stephen (2010), Intercompany Licensing Rates: Implications from Principal-Agent Theory, *International Tax Journal* , Vol. September - October 2010,25 -46;
53. Dalton M.Catherine, Jacobs H. David (2006), Related party transactions-too close for (shareholder's) comfort, *Journal of Business Strategy*, Vol.27, no. 7: 5-7;
54. Davies B. Ronald (2004), Tax Treaties and Foreign Direct Investment: Potential versus Performance, International Tax and Public Finance, Vol. 11: 775–802;
55. De Waegenaere Anja, Sansing Richard (2010), Inconsistent Transfer Prices and the Location of Mobile Capital, *National Tax Journal*, Vol. 63 (4, Part 2), 1085–1110;
56. Defee C. Clifford, Williams Brent, Randall S. Wesley, Thomas Rodney (2010), An inventory of theory in logistics and SCM research, *The International Journal of Logistics Management*, Vol. 21, no. 3: 404 – 489;
57. Devereux P. Michael (2004), Debating Proposed Reforms of the Taxation of Corporate Income in the European Union, *International Tax and Public Finance*, Vol. 11: 71–89;
58. Doff Renee, Bilderbeek Jan, Bruggink Bert, Emmen Pieter (2009), Performance Management in Insurance firms by Using Tranfer Pricing, *Risk Management and Insurance Review*, Vol. 12, no. 2: 213-226;
59. Dorestani Alireza (2004), Transfer price and equilibrium in multidivisional firms: an examination of divisional autonomy and central control, *Applied Economics*, Vol. 36: 1899–1906;
60. Drtina Ralph, Reimers L. Jane (2009) Global Transfer Pricing: A Practical Guide for Managers, *SAM Advanced Management Journal*, Vol. Spring 2009: 4 – 53;
61. Feltham S. Tammi, Phillips Fred, Sheehan T. Norman (2003), The Same Difference? A Transfer-Pricing Case, *Issues in Accounting Education*, Vol. 18, no. 1: 93 – 99;
62. Fisman Raymond, Wang Yongxiang (2010), Trade and Internal Organization of Firms - Trading Favors within Chinese Business Groups, American Economic Review: Papers & Proceedings, Vol. 100: 429–433;

63. Fox F. William, Murray N. Matthew (2005), How Should a Subnational Corporate Income Tax on Multistate Businesses Be Structured?, *National Tax Journal*, Vol. LVIIl, no. 1: 139 – 159;
64. France C. Necia, Graham A.J. Francis (2005), Cross-laboratory benchmarking in pathology: Scientific management or the art of compromise? *Benchmarking: An International Journal*, Vol. 12, no. 6: 523 – 538;
65. Fronda Yannick, Moriceau Jean-Luc (2008), I am not your hero: change management and culture shocks in a public sector corporation, *Journal of Organizational Change Management*, Vol. 21, no. 5: 589 – 609;
66. Fuest C., Hemmelgarn T., Ramb F., (2006), How would formula apportionment in the EU affect the distribution and the size of the corporate tax base? An analysis based on German multinationals, *Deutsche Bundesbank, Discussion Paper, Series 1: Economic Studies*, no. 20: 19-20;
67. Gallery Gerry, Gallery Natalie, Supranowicz Matthew (2008), Cash-based related party transactions in new economy firms, Accounting Research Journal, Vol. 21, no. 2: 147 – 166;
68. Gangopadhyay Partha (2007), Competitive Tax Evasion and Tranfer Pricices, *International Game Theory Review*, Vol. 9, no. 2: 347–351;
69. Georgopoulos Antonios, Koumanakos Evangelos Pet. (2007), Intra-firm organization and profitability: Evidence from transnational corporations, Journal of Accounting & Organizational Change, Vol. 3, no. 1: 44 – 67;
70. Getachew R.T., (2013), The regulation of related party transactions in the Ethiopian financial sector: with special focus on bank, Thesis for Master Degree Addis Ababa University School of Law, Ethiopia;
71. Ghosh Dipankar, Boldt N. Margaret (2004), The Outcome Saliency Effect on Negotiated Transfer Prices, *Journal of Managerial Issues*, Vol. XVI, no. 3: 305-321;
72. Golub Benjamin, McAfee R. Preston (2011), Firms, queues, and coffee breaks: a flow model of corporate activity with delays, Review of Economic Design, Vol. 15: 59 – 89;
73. Gordon A. Elizabeth, Henry Elaine, Louwers J. Timothy, Reed J. Brad (2007), Auditing Related Party Transactions: A Literature Overview and Research Synthesis, *Accounting Horizons*, Vol. 21, no. 1: 81–102;
74. Goulding R. Charles (2006), Global Tax Department Best Practices, *Internal Tax Journal*, Vol. Spring 2006, 57 – 59;
75. Gresik A. Thomas, Osmundsen Petter (2008),Transfer pricing in vertically integrated industries, International Tax Management, Vol. 15: 231–255;
76. Grubert Harry (2003), Intangible Income, Intercompany Transactions, Income Shifting and the Choice of Location, *National Tax Journal*, Vol. LVI, no. 1, part 2: 221 – 242;
77. Gujarathi R. Mahendra (2007), GlaxoSmithKline Plc.: International Transfer Pricing and Taxation , Issues in Accounting Education, Vol. 22, no. 4: 749–759;
78. Gupta M Krishan, Gunasekaran A. (2005), Costing in new enterprise environment: A challenge for managerial accounting researchers and practitioners, *Managerial Auditing Journal*, Vol. 20, no. 4: 337 – 353;
79. Halkos George, Tzeremes Nickolaos (2012), Ranking accounting, banking and finance journals: A note, *Munich Personal RePEc Archive*, paper no 36166;
80. Halpern Irwin Trump Chris (2008), Dual Consolidated Losses, *International Tax Journal*, May - June, 27-62;
81. Hashim F, Saleh N Mohd, (2007), Voluntary Annual Report Disclosures by Malaysian Multinational Corporations, *Malaysian Accounting Review*, Vol. 6. no 1: 129-156;
82. Hellerstein Walter, McLure Jr. E. Charles (2004), The European Commission's Report on Company Income Taxation: What the EU Can Learn from the Experience of the US States, *International Tax and Public Finance*, Vol. 11: 199–220;
83. Hill M. James (2007), Temporary Services Regulations Adopt New Methods for Charging Routine, Intercompany Administrative Services at Cost, *BDO Munich*, Vol. November–December 2007, 21 – 45;
84. Hiemann Moritz, Reichelstein Stefan, Transfer pricing in multinational corporations: an integrated management and tax perspective;
85. Hiemann Moritz, Reichelstein Stefan (2012), The Dual Role of Transfer Prices in Multinational Firms: Divisional Performance Measurement and Tax Optimization, *The European Financial Review;*
86. Hines Peter, Francis Mark, Bailey Kate (2006), Quality-based pricing: a catalyst for collaboration and sustainable change in the agrifood industry?, *The International Journal of Logistics Management,* Vol. 17, no. 2: 240 – 259;
87. Ho, S.S.M., Wong, K.S. (2001), A study of the relationship between corporate governance structure and the extent of voluntary disclosure, *Journal of International Accounting, Auditing and Taxation*,vol.10, no. 2: 139-156;

88. Ho Daniel, Wong Brossa (2008), Issues on compliance and ethics in taxation: what do we know, *Journal of Financial Crime*, Vol. 15, no. 4: 369 – 382;
89. Hoi Ki, Ho Daniel (2008), Multinational Transfer Pricing: Evidence in the United Kingdom, *International Tax Journal*, Vol. July–August 2008, 43 – 48;
90. Hölzl,Werner (2005), The evolutionary theory of the firm. Routines, complexity and change, *Working Papers Series "Growth and Employment in Europe: Sustainability and Competitiveness"*, 46. Inst. für Volkswirtschaftstheorie und -politik, WU Vienna University of Economics and Business, Vienna.
91. Hopper Trevor (2011), Management Accounting: Strategic Decision Making, Performance and Risk, *Journal of Accounting & Organizational Change*, Vol. 7, no. 1: 96 – 97;
92. Hopper Trevor, Tsamenyi Mathew, Uddin Shahzad, Wickramasinghe Danture (2009), Management accounting in less developed countries: what is known and needs knowing, *Accounting, Auditing & Accountability Journal*, Vol. 22, no. 3: 469 – 514;
93. Hossain Mohammed, (2008), The Extent of Disclosure in Annual Reports of Banking Companies: The Case of India, *European Journal of Scientific Research* Vol. 4: 660-681;
94. Hu Songhua, Shen Yanqin, Xu Yuehua (2009), Determinants of related-party transactions: Evidence from China's listed companies during 2002 – 2006, *Front. Bus. Res. China*, Vol. 3, no. 2: 190–206;
95. Huang Chung-Jian, Kao Chau-Jung, Shyu So-De, Yu Chao-Hung (2011), Transfer Pricing of Taiwan's Listing/OTC Enterprises Between Mainland China and Taiwan: Quantile Regression Analysis, *Review of Pacific Basin Financial Markets and Policies*, Vol. 14, no. 1: 129–151;
96. Hunt M. James, Forman Howard (2006), The role of perceived risk in pricing strategy for industrial products: a point-of-view perspective, *Journal of Product & Brand Management*, Vol. 15, no. 6: 386 – 393;
97. James Wendy (2006), A processual view of institutional change of the budget process within an Australian government-owned electricity corporation, *International Journal of Public Sector Management*, Vol. 19, no. 1:5 – 39;
98. Jian Ming, Wong J. (2010), Propping through related party transactions, *Review of Accounting Studies*, Vol.15: 70–105;
99. Jones T. Marc (2000), The competitive advantage of the transnational corporation as an institutional form: A reassessment, *International Journal of Social Economics*, Vol. 27, no. 7: 943 – 958;
100. Jung Kooyul, Kim Boyoungand, Kim Byungmo (2009), Tax Motivated Income Shifting and Korean Business Groups (Chaebol), Journal of Business Finance & Accounting, Vol. 36 (5) & (6): 552–586;
101. Lantz Björn (2009), The double marginalization problem of transfer pricing: Theory and experiment, *European Journal of Operational Research*, Vol.196 : 434–439;
102. Lecomte Patrick, Ooi T.L. Joseph (2012), Corporate Governance and Performance of Externally Managed Singapore Reits, *Journal of Real Estate Finance & Economics*;
103. Li Jian (2006), Transfer Pricing Audits in Australia, China and New Zealand: A Developed VS. Developing Countries Perspective, *International Tax Journal*, 21 – 28;
104. Lin Ching-Wen, Chang Hsiao-Chen (2010), Motives of transfer pricing strategies - systemic analysis, *Industrial Management & Data Systems*, Vol. 110, no. 8: 1215 – 1233;
105. Lo W.Y. Agnes, Wong M.K. Raymond (2007), Tax Compliance and Audit Adjustment - An Investigation of the Transfer Pricing Methodologies, *International Tax Journal*, Vol. September-October 2007, 59 – 70;
106. Lo W.Y. Agnes, Wong M.K. Raymond, Firth Michel (2010), Can corporate governance deter management from manipulating eranings? Eidence from related-party sales transactions in China, *Journal of Corporate Finance*, Vol. 16: 225-235;
107. Luca A., Lupu M., (2012), Transfer pricing from a Romanian perspective, *Transfer Pricing International Journal*, no.12: 1-4;
108. Matsui Kenji (2011), Auditing internal transfer prices in multinationals under monopolistic competition, *International Tax and Public Finance*;
109. Matsui Kenji (2012), Cost-based transferpricingunder R&D risk aversion in an integrated supply chain, *International Journal of Production Economics*, 2012, Vol. 139: 69-79;
110. McLure Jr. E. Charles (2008), Harmonizing Corporate Income Taxes in the European Community: Rationale and Implications, *Tax Policy and the Economy*, 5 – 195;
111. Minz Jack (2003), Exploring Formula Allocation for the European Union, *International Tax and Public Finance*; Vol. 10, 695–711;
112. Mohammed R., Alwi K., Jamil C.Z.M., (2010), Sustainability Disclosure among Malaysian Sharáh-Compliant listed Companies: Web Reporting, *Issues in Social and Environmental Accounting*, Vol. 3, no. 2: 160-179;

113. Mol P. Nico, Beeres J.M. Robert (2005), Performance management in a setting of deficient output controls, *International Journal of Productivity and Performance Management*, Vol. 54, no. 7: 533 – 555;
114. Moll Jodie, Hoque Zahirul (2008), New organizational forms and accounting innovations: The specifier/provider model in the Australian public sector , *Journal of Accounting & Organizational Change*, Vol. 4, no. 3: 243 – 269;
115. Murphy L. Deborah, Shrieves E. Ronald, Tibbs L. Samuel (2009), Understanding the Penalties Associated with Corporate Misconduct: An Empirical Examination of Earnings and Risk, *Journal of Financial and Quantitative Analysis*, Vol. 44, no. 1: 55-83;
116. Myers B. Matthew, Cavusgil S. Tamer, Diamantopoulos Adamantios (2002), Antecedents and actions of export pricing strategy: A conceptual framework and research propositions, European Journal of Marketing, Vol. 36, no. 1: 159 – 188;
117. Myers Joan K., Collins Mary K (2011), An historical review of transfer pricing theories: addressing goal congruence within the organization, *ASBBS Proceedings*, Vol. 18, no. 1: 1-13;
118. Negrescu D. (coord.), (2007), Tendinţe de armonizare fiscală la nivelul Uniunii Europene. Provocări pentru România, Proiect SPOS 2007 – Studii de strategie şi politici, *Studiul nr. 5, Institutul European din România*, pp. 61-63;
119. Nekhili Mehdi, Cherif Moêz (2011), Related parties transactions and firm's market value: the French case, *Review of Accounting and Finance* , Vol. 10, no. 3: 291 – 315;
120. Nguyen T.K. Quyen (2011), The empirical literature on multinational enterprises, subsidiaries and performance, *Multinational Business Review*, Vol. 19, no. 1: 47 – 64;
121. Noga J. Tracy, Wilkinson R. Brett, Ford O. Caroline (2007), International Transfer Pricing at Marks Pharmaceuticals: A Tax and Financial Accounting Perspective, *Issues in Accounting Education*, Vol. 22, no. 4: 761–768;
122. Nor Juahir Mohd, Ahmad Norsiah, Saleh Norman Mohd (2010), Fraudulent financial reporting and company characteristics: tax audit evidence, *Journal of Financial Reporting and Accounting*, Vol. 8, no. 2: 128 – 142;
123. Noronha Carlos, Zeng Yun, Vinten Gerald (2008), Earnings management in China: an exploratory study, *Managerial Auditing Journal*, Vol. 23, no. 4: 367 – 385;
124. O'Brien, James M., Oates Mark A. (2008), Transfer Pricing - Covering Your Backside in a Foreign Transfer Pricing Audit, *International Tax Journal*, Vol. March–April 2008, 13 -22;
125. O'Brien, James M., Oates Mark A. (2007), Transfer Pricing - Housekeeping for Intercompany Services Transactions, *International Tax Journal*, Vol. September–October 2007, 21 – 73;
126. Olibe O. Kingsley, Rezaee Zabihollah (2008), Income shifting and corporate taxation: the role of cross-border intrafirm transfers, *Review of Accounting and Finance,* Vol. 7, no. 1: 83 – 101;
127. Oyelere B. Peter, Turner D. John (2000), A survey of transfer pricing practices in UK banks and building societies, *European Business Review*, Vol. 12, no. 2: 93 – 99;
128. Panteghini M Paolo, Schjelderup Guttorm (2006), To Invest or not to Invest: A real options approach to FDIs and tax competition, *International Tax and Public Finance*, Vol. 13, pp. 643–660;
129. Pendse J. Shantau (2012), International transfer pricing: A review of non-tax outlook, *Procedia - Social and Behavioral Sciences*, Vol. 37 : 337 – 343;
130. Pfeiffer Thomas, Schiller Ulf, Wagner Joachim (2011), Cost - based transfer pricing, *Review of Accounting Studies*, Vol. 16:219 -246;
131. Pizzo Michele (2011), Related party transactions under a contingency perspective, *Journal of Management Governance;*
132. Pop Cosmina Mădălina, Pop Valer, Balaciu Diana (2004), Transfer prices: mechanisms, methods and international approaches, *Annals of the University of Oradea, Economic Science Series*, 1403 – 1407;
133. Porporato Marcela (2009), Timing and drivers of management control systems in joint ventures: The effect on JV survival, *Qualitative Research in Accounting & Management*, Vol. 6, no. 4: 247 – 274;
134. Prasad Sameer, Sounderpandian Jayavel (2003), Factors influencing global supply chain efficiency: implications for information systems, *Supply Chain Management: An International Journal*, Vol. 8, no. 3: 241 – 250;
135. Rahaman Abu Shiraz , Everett Jeff, Neu Dean (2007), Accounting and the move to privatize water services in Africa, *Accounting, Auditing & Accountability Journal*, Vol. 20, no. 5: 637 – 670;
136. Riedel Nadine (2011), Taxing multi-nationals under union wage bargaining, *International Tax and Public Finance*, Vol. 18: 399–421;

137. Rodrigues Usha, Stegemoller Mike (2010), Placebo Ethics: a study in securities disclosure arbitrage, *Virginia Law Review*, Vol. 96, no. 1: 1 – 68;
138. Rosenthal Edward (2008), A game-theoretic approach to transfer pricing in a vertically integrated supply chain, *International Journal of Production Economics*, Vol. 115: 542-552;
139. Rossing C.Plsener, Rohde Carsten (2001), Overhead cost allocation changes in a transfer pricing tax compliant multinational enterprise, *Management Accounting Research* , Vol. 21: 199-216;
140. Sahay A. Savita (2003), Transfer Pricing Based on Actual Cost, *Journal of Management Accounting Research*, Vol. 15: 177–192;
141. Săcărin M., (2006), Aplicarea Standardelor Internaţionale de Raportare Financiară (de contabilitate) in Romania: trecut, prezent şi viitor*, Profesia contabilă şi Globalizarea*, *Congresul al XVI-lea al profesiei contabile din Romania*, Editura CECCAR, Bucureşti, p. 885;
142. Seetharaman A., Senthilvelmurugan M, Periyanayagam Rajan (2004), Anatomy of computer accounting frauds, *Managerial Auditing Journal*, Vol. 19, no. 8: 1055 – 1072;
143. Sikka Prem, Willmott Hugh (2010), The dark side of transfer pricing: Its role in tax avoidance and wealth retentiveness, *Critical Perspectives on Accounting*, Vol. 21 : 342 – 356;
144. Shackelford A. Douglas, Slemrod Joel, Sallee M. James (2011), Financial reporting, tax, and real decisions: toward a unifying framework, *International Tax and Public Finance*, Vol. 18: 461–494;
145. Shan Yuan George, Xu Lei (2012), Bad debt provisions of financial institutions: Dilemma of China's corporate governance regime, *International Journal of Managerial Finance*, Vol. 8, no. 4: 344 – 364;
146. Shaoul Jean, Stafford Anne, Stapleton Pam (2010), Financial black holes: The disclosure and transparency of privately financed roads in the UK, *Accounting, Auditing & Accountability Journal*, Vol. 23, no. 2: 229 – 255;
147. Sharkey Scott Pamela, Gibbons Patrick T., (2009), How subsidiaries are battling to survive and grow, *Strategy & Leadership*, Vol. 37, no. 4: 43 – 47;
148. Shelanski A. Howard (2004), Transaction-level determinants of transfer-pricing policy: evidence from the high-technology sector, *Industrial and Corporate Change*, Vol. 13, no 6: 953 – 966;
149. Simatupang M. Togar, Wright C. Alan, Sridharan Ramaswami (2004), Applying the theory of constraints to supply chain collaboration, *Supply Chain Management: An International Journal*, Vol. 9, no.1: 57 – 70;
150. Smith Michael (2000), Tax and Incentive Trade-Offs in Multinational Transfer Pricing, *Journal of Accounting, Auditing and Finance*, 209 – 236;
151. Sorensen Peter Birsch (2007), The theory of optimal taxation: what is the policy relevance?, *International Tax and Public Finance*, Vol. 14: 383–406;
152. Sousa M.P. Carlos, Bradley Frank (2009), Price adaptation in export markets, *European Journal of Marketing*, Vol. 43, no. 3: 438 – 458;
153. Stauropoulus Antonios, Samaras Ioannis, Panagiotis Arsenos (2011), The effect of the international accounting standards on the related party transactions disclosure, *American Journal of Applied Sciences* , Vol. 8, no. 2: 156-163;
154. Stevenson H. Thomas, Cabell W.E. David (2002), Integrating Transfer Pricing Policy and Activity-Based Costing, *Journal of International Marketing* , Vol. 10, no. 4: 77-88;
155. Stewart Kenneth, Webb Michael (2006), International competition in corporate taxation: evidence from the OECD time series, *Economic Policy*, 153–201;
156. Street D., (2001), Observance of International Accounting Standards: Factors explaining non-compliance, *AACCA Research Report*, Vol. 74: 1-127;
157. Sun Pei, Mellahi Kamel, Liu S. Guy (2011), Corporate governance failure and contingent political resources in transition economies: A longitudinal case study, *Asia Pacific Journal of Management*, Vol. 28: 853–879;
158. Tan Sulina, Su Leen (2005), The management accounting implications of trust: An analysis of three applications and specification of a possible research agenda, *Journal of Applied Accounting Research*, Vol. 7, no. 3: 27 – 77;
159. Thomas C. William (2002), The Rise and Fall of Enron, *Journal of Accountancy*, April 2002, 41 – 48;
160. Tomohara Akinori (2004), Inefficiencies of Bilateral Advanced Pricing Agreements (BAPA) in Taxing Multinational Companies, *National Tax Journal*, Vol. LVII, no. 4: 863 – 873;
161. Tong Yan, Wang Huacheng (2008), Related party transactions, benefits of control and earnings quality, *Front. Bus. Res. China*, Vol. 2, no. 2: 187–203;
162. Van Amson Peter (2000), Implementing option adjusted transfer pricing, *Balance Sheet,* Vol. 8, no. 6: 29 - 31;

163. Vosselman Ed, Van der Meer-Kooistra Jeltje (2006), Efficiency seeking behaviour in changing management control in interfirm transactional relationships: An extended transaction cost economics perspective, *Journal of Accounting & Organizational Change*, Vol. 2, no. 2: 123 – 143;
164. Walker R.G. (2004), Gaps in Guidelines on Audit Committees, *ABACUS*, Vol. 40, no. 2: 157 – 192;
165. Wanderley Cláudio de Araújo, Cullen John, Tsamenyi Mathew (2011), Privatisation and electricity sector reforms in Brazil: accounting perspective, *Journal of Accounting in Emerging Economies*, Vol. 1, no. 1: 53 – 75;
166. Wang Leonard Fong-Sheng, Wang Ya-Chin (2008), Brand proliferation and inter-brand competition: The strategic role of transfer pricing, *Journal of Economic Studies,* Vol. 35, no. 3: 278 – 292;
167. Ward Dana (2008), The changing tax environment for the UK hedge fund sector, *Journal of Investment Compliance*, Vol. 9, no. 1: 24 – 29;
168. Waweru Nelson Maina, Hoque Zahirul, Uliana Enrico (2004), Management accounting change in South Africa: Case studies from retail services, *Accounting, Auditing & Accountability Journal*, Vol. 17, no. 5: 675 – 704;
169. Williams G. Michael, Swenson W. Charles, Lease L. Terry (2001), Effects of Unitary vs. Nonunitary State Income Taxes on Interstate Resource Allocation: Some Analytical and Simulation Results, *The Journal of the American Taxation Association*, Vol. 2X , no. I, Spring 2001, 39-60;
170. Wood E. Richard, Ellis J. Douglas (2007), The SEC's New Executive and Director Compensation and Related Party Disclosure Rules: A Guide for Companies and Compensation Committees, *Benefits Law Journal*, Vol. 20, No. 1, Spring 2007: 4 – 32;
171. Yonnedi Efa (2010), Privatization, organizational change and performance: evidence from Indonesia, *Journal of Organizational Change Management*, Vol. 23, no. 5: 537 – 563;
172. Zhu Song, Chen Chao, Ma Yuan (2010), Bidirectional capital impropriation and capital investment of listed companies, *Nankai Business Review International*, Vol. 1, no. 3: 254 – 272;
173. Zodrow R. George (2006), Capital Mobility and Source-Based Taxation of Capital Income in Small Open Economies, *International Tax and Public Finance*, Vol. 13: 269–294;
174. Wagdy M. Abdallah, Ahmed S. Maghrabi (2009), Do multinational companies have effective transfer pricing systems of intangible assets and e-commerce? *International Journal of Commerce and Management*, Vol. 19, no. 2: 115 – 126.

B. Books

1. Chelcea Septimiu (2007), *Metodologia cercetării sociologice. Metode cantitative şi calitative (ediţia a III-a, revăzută şi adăugită)*, Editura Economică, Bucureşti;
2. Sullivan Arthur, Steven M. Sheffrin (2003), Economics: Principles in action, Upper Saddle River, New Jersey, Pearson Prentice Hall;
3. Zaman Gheorghe, Geamănu Marinela, (2006), *Eficiență Economică*, Ed. Fundației România de Mâine, București.

C. Other sources

1. Agúndez-García A., (2006), The Delineation and Apportionment of an EU Consolidated Tax Base for Multi-jurisdictional Corporate Income Taxation: a Review of Issues and Options, *European Commision*, *Taxation Papers*, Working Paper no. 9;
2. AS Statement no.11, la adresa: http://www.pwcaarata.or.jp/e/knowledge/accounting/japan/20061017.html;
3. AS Statement no.11, la adresa: https://www.asb.or.jp/asb/asb_e/technical_topics_reports/related_party/related_party_ig.jsphttp://www.aiaworldwide.com;
4. Bostan I., Drept fiscal şi comunitar, la adresa: http://www.cse.uaic.ro/_fisiere/Documentare/Suporturi_curs/V_Drept_fiscal_comunitarr_Master.pdf;
5. Brøchner J., Jensen J., Svensson P., Sørensen P.B., (2006), The dilemmas of tax coordination in the enlarged European Union, *CESIFO* Working Paper no. 1859;
6. Chandrasekhar K., (2011), A publication for financial services industry tax and transfer pricing professionals, *PricewaterhouseCoopers*, 2011;
7. Charles H., Aidan K., Huw M., Michael R. (2010), Academic Journal Quality Guide, version 4, Published by The Association of Business Schools (ABS), UK;

8. Comisia Europeană, (2011), Proposal for a Council Directive on a Common Consolidated Corporate Tax Base (CCCTB), Bruxel, martie 2011;
9. Comisia Europeană, (2011), Citizen's summary: A common corporate tax system for the EU, Bruxel, martie 2011;
10. Cristache S.E., (2003), Metode statistice de calcul şi analiză a eficienţei economice în comerţ, carte disponibilă on-line la adresa: http://www.biblioteca-digitala.ase.ro/biblioteca/carte2.asp?id=226&idb=;
11. Deloitte (2011), International Financial Reporting Standards Compliance questionnaire 2011 *;*
12. Devereux M.P., Loretz S., (2007), The effects of EU formula apportionment on corporate tax revenues, *Oxford University, Centre for Business Taxation*, Working Paper no. 6: 16;
13. Devereux M.P, Loretz, S., (2008), Increased efficiency through consolidation and formula apportionment in the European Union?, *Oxford University, Centre for Business Taxation*, Working Paper no. 12: 23;
14. Drăgan, C.M., Contabilitatea şi Europa – la adresa: http://cmdragan.ablog.ro/2010-0512/contabilitatea-si-europa.html;
15. Ernick D., (2013), Former Treasury Official Expects OECD's BEPS Project Will Improve, Not Jettison, Existing International Tax Rules, *Tax Management INC*, la adresa: http://www.pwc.com/en_US/us/tax-services/publications/assets/pwc-former-treasury-offical-expects-oecds-beps-project.pdf;
16. Ernst & Young, (2011), *IFRS Core Tools* – International GAAP Disclosure Checklist Based on International Financial Reporting Standards in issue at 30 September 2011;
17. FASB Accounting Standards Codification, la adresa*:* http://www.aicpa.org/InterestAreas/AccountingAndAuditing/Resources/AcctgFinRptg/AcctgFinRptgGuidance/Pages/FASBAccountingStandardsCodification.aspx;
18. FASB Accounting and Standard codification, la adresa: http://www.picpa.org/Content/Files/Documents/Q&A-FASB-ASC-FINAL.pdf;
19. Hoffjan Andreas, Plagge J. Carl (2006), A meta-analysis of international journal rankings in accounting, Work in Progress;
20. Hudston M., (2011), Transfer pricing trends in the retail and consumer sector, *PricewaterhouseCoopers*;
21. IASB – IAS 24 – Related Party Transactions, 2011;
22. IAS 24, la adresa: http://www.contzilla.ro/tag/ias/;
23. IAS 24, la adresa: http://www.iasplus.com/standard/ias24.htm;
24. IAS 24, la adresa: http://www.icaew.com/en/technical/financial-reporting/ifrs/ifrs-standards/ias-24-related-party-disclosures#Version;
25. IAS 24, la adresa: http://www.ifrsclass.com/gaap/ias/ias-24.htm;
26. KPMG (2010), Global Transfer Pricing Review;
27. KPMG (2011), IFRS disclosure checklist 2011*;*
28. Lowell C., Herrington M., Lowell D.Y., Noren G.D, Ross J., Scott T., (2013), A Call to Rewrite the Fundamentals of International Taxation: the OECD BEPS Action Plan, la adresa: http://www.mwe.com/Rewriting-the-Fundamentals-of-International-Taxation-the-OECD-BEPS-Action-Plan-07-19-2013/;
29. Nishikawa I., *Japanese Accounting Standards and its International Convergence,* la adresa: http://www.cfo.jp/conference/pdf/8-01e.pdf;
30. OECD, (2010), Model Tax Convention on Income and on Capital;
31. OECD, (2010), Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations;
32. OECD, (2013), Adressing Base Erosion and Profit Shifting;
33. OECD, (2013), Action Plan on Base Erosion and Profit Shifting;
34. PricewaterhouseCoopers, (2011), IFRS disclosure checklist 2011*;*
35. PricewaterhouseCoopers, A practical guide to new IFRSs for 2011, la adresa: http://www.pwccomperio.com/Contents/English/Internal/IAS/a_practical_gui_tn_ifrss_2011.pdf;
36. PricewaterhouseCoopers, International Financial Reporting Standards – Pocket Guide 2010, la adresa: http://www.pwccomperio.com/Contents/English/Internal/IAS/pocket_guide_20_1_0_final.pdf;
37. PricewaterhouseCoopers, IFRS and US GAAP – similarities and differences, September 2010, la adresa: http://www.pwccomperio.com/whatsnew/ifrs-simdif_book-final-2010.pdf;
38. Raad, K, (2012), International & EC Tax Law, *International Tax Center*, Leiden;
39. Raby, N., (2013), International Transfer Pricing 2013, *PricewaterhouseCoopers*;
40. Saint-Amans P., (2013), What the BEPS are we talking about?, OECD Centre for Tax Policy and Administration, la adresa: http://www.oecd.org/ctp/what-the-beps-are-we-talking-about.htm;

41. Seminar on US GAAP, IFRS & Indian GAAP – a Comparison, la adresa: http://www.docstoc.com/docs/27061018/Related-Party-Transactions---The-Associated-Chambers-of-Commerce;
42. Stone, G., (2013), Transfer pricing perspectives 2013, *PricewaterhouseCoopers;*
43. Tully Brian (2012), International Tax: Transfer Pricing Strategies and the Impact on Organizations, disponibil on – line la: http://www.financialexecutives.org/KenticoCMS/Financial-Executive Magazine/2012_07/Transfer-Pricing-Strategies-and-the-Impact-on-Orga.aspx;
44. www.anaf.ro
45. www.cfe-eutax.org*;*
46. www.cnvm.ro*;*
47. www.eur-lex.europa.eu;
48. www.fasb.org;
49. www.iasb.org;
50. www.oecd.org;
51. www.tpanalytics.com.

D. Legislation

1. Arbitration Convention on the elimination of double taxation in connection with the adjustment of profits of associated enterprises (90/436/EEC);
2. Hotărârea Guvernului 44/2004 (M.Of.: 112 din 06.02.2004) pentru aprobarea Normelor metodologice de aplicare a Legii nr. 571/2003 privind Codul fiscal;
3. Hotărârea Guvernului 529/2007 (M.Of.: 395 din 12.06.2007) pentru aprobarea Procedurii de emitere a solutiei fiscale individuale anticipate si a acordului de pret in avans;
4. Legea Contabilităţii 82/1991 (M.Of.: 454 din 18.06.2008);
5. Legea 571/2003 privind Codul Fiscal (M.Of.: 927 din 23.12.2003);
6. Legea 76/2010 (M.Of.: 307 din 11.05.2010) privind aprobarea Ordonantei de urgenta nr. 109/2009 pentru modificarea Legii nr. 571/2003 privind Codul fiscal
7. *OMF 907/2005* (M.Of.: 597 din 11.07.2005) privind aprobarea categoriilor de persoane juridice care aplică reglementări contabile conforme cu Standardele Internaţionale de Contabilitate, respectiv reglementări contabile conforme cu directivele europene;
8. *OMF 1121/2006* (M.Of.: 602 din 12.07.2006) privind aplicarea Standardele Internaţionale de Contabilitate;
9. *Ordinul ANAF 222 / 2008* (M.Of.: 129 din 19.02.2008) privind conţinutul dosarului preţurilor de transfer;
10. *OMF 3055/2009* (M.Of.: 766 bis din 10.11.2009) pentru adoptarea Reglementărilor contabile conforme cu Directivele Europene;
11. *OMF 881/2012* (M.Of.: 424 din 26.06.2012) privind aplicarea de către societăţile comerciale ale căror valori mobiliare sunt admise la tranzacţionare pe o piaţă reglementată a Standardelor Internaţionale de Raportare Financiară.
12. *OMF 1286 / 2012* (M.Of.: 687 bis din 04.10.2012) pentru aprobarea Reglementărilor contabile conforme cu Standardele internaţionale de raportare financiară, aplicabile societăţilor comerciale ale căror valori mobiliare sunt admise la tranzacţionare pe o piaţă reglementată
13. *Ordonanţa 92 / 200*3 (M.Of.: 863 din 26.09.2005) privind Codul de Procedură Fiscală;
14. *Regulamentul (CE)1602/2002* al Parlamentului European şi al Consiliului privind aplicarea standardelor internaţionale de contabilitate;
15. *Regulamentul (CE) 1725/2003* al Comisiei din 29 septembrie 2003 de adoptare a anumitor standarde internaționale de contabilitate, în conformitate cu Regulamentul (CE) nr. 1606/2002 al Parlamentului European și al Consiliului;
16. *Regulamentul (CE) 1126/2008* al Comisiei din 3 noiembrie 2008 de adoptare a anumitor standarde internaționale de contabilitate în conformitate cu Regulamentul (CE) nr. 1606/2002 al Parlamentului European şi al Consiliului;
17. *Regulamentul (UE) 632/2010* al Comisiei din 19 iulie 2010 de modificare a Regulamentului (CE) nr. 1126/2008 de adoptare a anumitor standarde internaționale de contabilitate în conformitate cu Regulamentul (CE) nr. 1606/2002 al Parlamentului European și al Consiliului în ceea ce privește Standardul Internațional de Contabilitate (IAS) 24 și Standardul Internațional de Raportare Financiară (IFRS) 8.

E. Web pages of companies listed on BVB (chapter 3)

1.www.aerostar.ro;
2.www.alro.ro:
3.www.altursa.ro;
4.www.alumil.ro;
5.www.amonil.ro
6.www.antibiotice.ro;
7.www.armatura.ro;
8.www.artego.ro;
9.www.carpatica.ro:
10.www.bancatransilvania.ro;
11.www.bermas.ro;
12.www.biofarm.ro;
13.www.boromir.ro;
14.www.brd.ro;
15.www.transelectrica.ro;
16.www.calipso-oradea.ro;
17.www. carbochim.ro;
18.www.bestwesternbucovina.ro;
19.www.cemacon.ro;
20.www.comcm.ro;
21.www.comelf.ro;
22.www.compa.ro;
23.www.energo.ro
24.www.concefa.ro;
25.www.condmag.ro;
26.www.conted.ro;
27.www.contorgroup.ro;
28.www.mechel-tgv.ro;
29.www.dafora.ro;
30.www.electroaparataj.ro;
31.www.electroarges.ro;
32.www.electromagnetica.ro;
33.www.electroputere.ro;
34.www.electroputere.ro;
35.www.electrocontact.ro;
36.www.impactsa.ro;
37.www.mecanicaceahlau.ro;
38.www.mefin.ro;
39.www.maillis.ro;
40.www.oil-terminal.com;
41.www.oltchim.ro;
42.www.petrom.com;
43.www.petex.ro;
44.www.prefab.ro;
45.www.prodplast.ro;
46.www.retrasib.ro;
47.www.romcarbon.com;
48.www.rompetrol.ro;
49.www.petros.ro;
50.www.rompharm.ro;
51.www.transgaz.ro;
52.www.snorsova.ro;
53.www.transilvaniaconstructii.ro;
54.www.sinteza.ro;
55.www.siretul.ro;
56.www.socep.ro;
57.www.stirom.ro;
58.www.teraplast.ro;
59.www.titan.ro;
60.www.artrom.ro;
61.www.turbomecanica.ro;
62.www.turismbailefelix.com;
63.www.thrmareaneagra.ro;
64.www.uamt.ro;
65.www.ucmr.ro;
66.www.uztel.ro;
67.www.ves.ro;
68.www.voestalpine.com/vaeapcarom;
69.www.vrancart.ro; 70. www.zentiva.com.