Acta Globalis Humanitatis et Linguarum
ISSN: 3030-1718
Vol. 2, No. 4 (2025): Autumnus 2025

Transfer Pricing Management in the Context of Digitalization

[1] **Hanna Kostovyat,** [2] **Viacheslav Rogov**
https://doi.org/10.69760/aghel.0250040010

Keywords

transfer pricing
tax system
digital transformation
foreign economic activity
financial modeling

Abstract

The article examines the current issues of transfer pricing management in the modern context, particularly in light of the digital transformation of Ukraine's tax and customs authorities. It is proven that Ukrainian legislation contains significant shortcomings, especially the terminological conflict between the Net Profit Method, as defined in the Tax Code of Ukraine, and the Transactional Net Margin Method, established in OECD Guidelines. This creates legal uncertainty, increases tax risks for businesses, and complicates international cooperation.

The study analyzes the impact of digitalization processes, including Ukraine's accession to mechanisms such as the CbC MCAA, CRS MCAA, and the implementation of the NCTS system, on transfer pricing control and access to reliable comparable data. The scientific novelty lies in the comprehensive analysis of the interrelation between the digital transformation of fiscal authorities and the effectiveness of transfer pricing regulation, as well as in the proposals for harmonizing Ukrainian legislation with international standards.

Among the practical outcomes of the research:

- main challenges in applying TNMM in Ukraine are identified;
- internal policy recommendations for transfer pricing are proposed.

[1] Kostovyat, H. PhD in Economics, Associate Professor, Department of Finance and Banking, Uzhhorod National University, Uzhhorod, Ukraine. ORCID: https://orcid.org/0000-0001-8498-3419

[2] Rogov, V. PhD in Economics, Associate Professor, Intelligent Digital Economy Department, Admiral Makarov National University of Shipbuilding, Mykolaiv, Ukraine. ORCID: https://orcid.org/0000-0002-1847-5907

• the importance of functional analysis, comparability adjustments, and regular updates to pricing models is substantiated;
• practice-oriented recommendations are provided for enterprises on documentation, tested party selection, and profitability indicators.
The findings can be used to improve national legislation in the field of transfer pricing, to develop internal tax optimization policies, and to conduct regular audits of pricing strategies, especially in cases of capital structure changes and shifts in business conditions.

Introduction

In the current context of globalization of economic processes, the active development of international trade, and the strengthening of tax control, transfer pricing management is gaining particular importance for enterprises engaged in transactions with related parties across different countries. Transfer pricing (TP) is a key tool for ensuring the arm's length principle, which states that prices for intra-group transactions must be comparable to those in transactions between independent enterprises.

The importance of this issue increases with the ongoing digital transformation of state fiscal institutions in Ukraine since 2022, particularly through its accession to international mechanisms such as the CbC MCAA, CRS MCAA, and the implementation of the NCTS system.

Digital modernization of the tax and customs services creates both a technical and legal framework for information exchange, profitability analysis, and automated transfer pricing control. This is directly related to the practical use of one of the most widely applied transfer pricing methods — the Transactional Net Margin Method (TNMM), which is popular in international business due to its flexibility, data availability, and lower dependence on exact comparability of products or services.

However, the *Tax Code of Ukraine* does not refer to TNMM directly, instead using an inaccurate term — "net profit method" (Cabinet of Ministers of Ukraine, 2010), which does not correspond to the *OECD Transfer Pricing Guidelines* (OECD, 2022), creating risks of misinterpretation, enforcement errors, and elevated fiscal uncertainty.

This article aims to:

- clearly distinguish between the terms "net profit method" and "TNMM";
- analyze the current state of transfer pricing regulation in Ukraine;
- identify key deficiencies in the national legal framework;

- define the role of digital transformation in transfer pricing management.

These issues are especially relevant for Ukrainian businesses involved in cross-border operations, where mispricing can lead to tax reassessments, double taxation, administrative barriers, and reduced competitiveness in international markets.

Problem statement

In the context of intensified international economic relations and the digital transformation of the financial sector, effective transfer pricing management is becoming increasingly relevant. Globally, there is a growing reliance on digital tax information exchange platforms, automated financial reporting analysis systems, and transparency initiatives such as those under the OECD BEPS framework.

This is particularly important for Ukraine due to the need to harmonize national tax policies with international standards and to accommodate the increasing role of transnational business and the post-war recovery of the economy. At the same time, methodological and terminological inconsistencies persist in Ukrainian legislation, particularly concerning the application of TNMM. These discrepancies create legal ambiguity and reduce the effectiveness of transfer pricing control in the digital era.

Literature review

Recent studies by the OECD (2025), the IMF (2020), and the World Bank (2021) emphasize that the digitalization of tax administrations is one of the key components of modernizing tax control. In this context, BEPS Action 13 (OECD, 2024) underlines the importance of implementing country-by-country reporting (CbCR). Meanwhile, the development of automatic data exchange — particularly through the CRS MCAA initiated by the OECD — also plays a significant role in enhancing tax oversight.
In the current environment of harmonizing national tax legislation with international standards, the issue of terminological consistency is attracting increased attention. In Ukraine's transfer pricing practice, there is a clear methodological ambiguity stemming from discrepancies between the terms codified in the *Tax Code of Ukraine* (Cabinet of Ministers of Ukraine, 2010) and the *OECD Transfer Pricing Guidelines* (OECD, 2022).

An analysis of the Ukrainian transfer pricing landscape reveals a growing reliance on the Transactional Net Margin Method (TNMM), driven by the difficulty of applying other methods in cases involving digital transactions or a lack of comparable data. At the same time, leading audit firms have identified several barriers to the effective implementation of this method in the Ukrainian context. According to Deloitte (2024), one of the key challenges is the limited access to reliable comparable data, which prevents objective testing of the arm’s length nature of profits generated in controlled transactions. KPMG's analytics (KPMG Ukraine, 2025) similarly highlight

the limitations of local databases and the lack of a systematic approach to updating pricing models, which undermines the effective use of TNMM.

Objective

The purpose of this study is to identify contemporary challenges in transfer pricing under the digital transformation of Ukraine's fiscal authorities and to propose approaches for improving transfer pricing management, taking into account international standards and digital tools.

Main Content

Transfer pricing management in the context of foreign economic activity is a multidimensional task that combines strategic planning, regulatory compliance, and analytical support.

Transfer pricing refers to the system for determining prices in transactions between related parties within a group of companies located in different tax jurisdictions. It has both fiscal and strategic significance. The key objective is to ensure that transfer prices comply with the arm's length principle — meaning that prices should be consistent with those that would have been established between independent entities under comparable circumstances.

International standards, particularly those outlined in the OECD Transfer Pricing Guidelines, provide for the use of the following main transfer pricing methods:

- the Comparable Uncontrolled Price (CUP) method;
- the Resale Price Method (RPM);
- the Cost Plus Method (CPM);
- the Transactional Net Margin Method (TNMM);
- the Transactional Profit Split Method (PSM).

The Transactional Net Margin Method (TNMM) is among the most widely used. Its popularity is due to its flexibility, data availability, and lower dependence on the precise replication of product or service characteristics compared to the CUP method. TNMM enables the analysis of the net profit level of the tested party relative to its peers. It is commonly applied in cases where directly comparable transactions are difficult to identify — for example, for intra-group services, licensing of intangible assets, manufacturing operations, or distribution activities.

Application of the TNMM according to international standards involves a clear sequence of steps:

1. Selection of the tested party. This is the party to the transaction that performs less complex functions, bears fewer risks, and uses fewer assets. The comparability analysis is conducted with respect to this party.

2. Conducting a functional analysis (TAR – Tasks, Assets, Risks or FAR — Functions, Assets, Risks). This analysis identifies the functions performed by each party, the assets used, and the risks assumed. It forms the basis for selecting the tested party and applying comparability adjustments.

3. Determining the appropriate net profit indicator. The choice depends on the nature of the tested party's activity and may include indicators such as operating margin (EBIT/Sales), return on assets (EBIT/Assets), or full-cost markup (EBIT/Costs).

4. Identifying comparable uncontrolled companies or transactions. Independent companies with similar functions, risks, industry profiles, etc., are selected. Data sources may include public financial reports, commercial databases (e.g., Bloomberg, Orbis, RoyaltyRange), or state registries.

5. Making comparability adjustments. Differences in functions, risk profile, capital structure, geographic markets, etc., are considered. Adjustments must be justified and documented.

6. Establishing an arm's length range of profitability. The OECD recommends using statistical methods — such as the interquartile range — to determine acceptable profit margins. If the profitability of the tested party falls within the range, the transaction is considered to be at arm's length.

7. DEMPE analysis (Development, Enhancement, Maintenance, Protection, Exploitation) This is used for analyzing the allocation of returns from intangible assets, which is crucial under OECD guidelines.

In Ukraine, the situation with TNMM is complicated by terminological inconsistencies in the Tax Code. The section 140.20 of the Tax Code of Ukraine (TCU) lists transfer pricing methods using the term "Net Profit Method". However, this does not formally correspond to the internationally accepted "Transactional Net Margin Method" (TNMM) as defined in OECD guidelines.

The shortcomings of Ukrainian legislation in this area are significant:

- terminological inaccuracies that increase the risk of misinterpretation;

- lack of a clear procedural algorithm for method application (selection of the tested party, indicators, search for comparables, etc.);

- no mandatory requirement for conducting a functional analysis;

- no obligation to document the analysis, making it harder to justify prices before the tax authorities;

- limited access to reliable comparables for Ukrainian taxpayers;

- the Net Profit Method is described generically as one that compares the profitability level of controlled transactions to that of comparable uncontrolled transactions;

- no application of DEMPE logic, which is mandatory in the OECD Transfer Pricing Guidelines;

- no clear definition of acceptable profitability ranges based on types of activities or asset categories;

- no specialized requirements for selecting profit-level indicators (e.g., EBIT/Sales or EBIT/Assets), while the OECD insists on the most relevant metric.

As a result, in practice:

- proper functional analysis is often not conducted (especially by SMEs);

- local comparables are used instead of international sources, despite OECD recommendations;

- the method is reduced to a simplistic profit comparison, without deeper analysis of cost structures, intangibles, or marketing functions.

These issues limit the effectiveness of national legislation, create legal uncertainty, and hinder harmonization with international norms. They increase the risk of tax adjustments during international audits and create additional burdens for companies operating in multiple jurisdictions.

To address these challenges, Ukraine needs to:

- harmonize TCU terminology with OECD Guidelines;

- formally recognize the DEMPE approach;

- develop a unified system for functional analysis and access to reliable databases for benchmarking.

Modern economic processes are increasingly driven by digital technologies, which fundamentally change traditional business models, including those related to transfer pricing. The growing volume of transactions involving intangibles, software, cloud computing, and digital platforms complicates the task of ensuring that controlled transactions reflect market conditions.

In the context of digital transformation, the global tax community has, for several years, emphasized the need to adapt transfer pricing principles to new realities. In particular, the OECD's BEPS (Base Erosion and Profit Shifting) Action Plan, introduced in 2015, outlined key tax challenges posed by the digital economy. The *OECD/G20 Inclusive Framework on BEPS* (2020) report emphasized that traditional approaches to defining functions, risks, and assets are no longer sufficient in the context of global digital interaction, where value is generated not only through

classical production factors but also through user data, intangible solutions, and platform architectures.

Starting from January 1, 2025, significant amendments to the legislation governing transfer pricing (TP) came into force in Ukraine. These changes are part of systemic reforms aimed at enhancing tax control and aligning national legislation with international standards. The updates cover key issues such as the definition of controlled transactions, criteria for related parties, updates to the list of jurisdictions subject to specific tax restrictions, as well as new requirements for reporting and penalties (Ivchenko, 2025).

Modern economic processes are increasingly driven by digital technologies, transforming the principles and mechanisms of transfer pricing in several key areas:

The growing role of intangible assets. Data, software, artificial intelligence algorithms, user bases, and marketing intangibles constitute the core of value creation in digital businesses. Traditional TP methods — especially those based on pricing of physical goods — are often inapplicable to the valuation of such assets. For example, it is challenging to apply the Comparable Uncontrolled Price (CUP or CUT) method to unique digital solutions that have no standard market equivalents.

Digitalization of business models and blurred tax presence. The rise of digital technologies has enabled business models where companies operate in foreign markets without establishing physical presence. This makes it impossible to apply classic criteria for a permanent establishment (PE) and complicates the tax identification of income. As a result, tax authorities face limitations in controlling transfer pricing for cross-border digital transactions conducted between related parties without company registration in the income-generating jurisdiction.

Complications in functional analysis for digital transactions. Functional analysis is a key element in determining the arm's length nature of controlled transactions. In a digital context, it requires substantial expansion. Specifically, identifying each party's contribution to the development of intangible assets — such as algorithms, user data, or digital platforms — requires specialized approaches. The traditional Functions–Assets–Risks (FAR) framework becomes less applicable, especially in multi-jurisdictional transactions lacking physical components, where profits are driven by network effects or advertising monetization (OECD/G20 Inclusive Framework on BEPS, 2021).

Dynamics of digital transactions and complexity of market valuation
In the digital economy, most transactions take the form of subscriptions, licenses, API access, big data processing, or the use of SaaS products. These transactions are typically recurring, variable in price, and often lack direct market comparables. This limits the applicability of the CUP method. In such cases, the risk of distortion in transfer pricing increases, necessitating the use of alternative valuation methods — such as profit split or economic modeling using multifactor analysis (Krauze, 2015).

To address these challenges and improve TP management in the context of digitalization, this study proposes a structured system of measures grouped by key focus areas. Table 1 provides a concise overview of these recommended approaches, incorporating international best practices.

Table 1; Key Areas for Improving Transfer Pricing Management in the Context of Digital Transformation

Area of Improvement	Specific Measures	Alignment with International Standards
Regulatory-Legal	- Harmonization of terminology with OECD Guidelines - Regulation of DEMPE application - Adaptation of TNMM to digital models	OECD TP Guidelines (2022)
Technological	- Electronic platform for submitting the Master File - CbCR analytics - AI-based risk analysis	EU BEFIT, OECD FTA (2021)
Institutional	- Establishment of TP analytical units - Training of professionals in digital TP - Public consultations by the State Tax Service	IMF (2020), examples: Italy, Canada
International Cooperation	- Participation in the BEPS Inclusive Framework - Accession to TNA and JITSIC - Support for Pillar 1 and Pillar 2	OECD, EU

The proposed areas for improving transfer pricing take into account the challenges of the digital era. However, it is important to understand that simply implementing international standards is not enough. There are several specific features in Ukraine that must be considered.

Firstly, even if terminology is harmonized and DEMPE and TNMM are implemented, this does not automatically guarantee improved control. Many companies are still not prepared to transparently and promptly provide all the required information. Therefore, it is important not only to change laws, but also to develop practical guidance and conduct training for enterprises and tax officers.

Secondly, digital tools are a powerful resource, but their use in Ukraine is often hindered by insufficient technical infrastructure and a lack of specialists capable of working with big data and analyzing complex digital transactions. It is essential to invest in developing these competencies and to create interagency teams for data processing.

Thirdly, international cooperation is becoming not just an advantage, but a necessity — especially considering that much of the digital business operates without physical presence in the country. Ukraine should actively participate in global initiatives, share information, and take part in joint audits to reduce tax evasion risks.

Furthermore, at the current stage of digitalization of Ukraine's tax system, it is crucial to develop a new approach to determining the tested party when applying the TNMM. In traditional business models, the tested party is usually the one performing less complex functions and holding fewer assets. However, in the digital economy, this logic often does not apply: a software product or digital platform may lack a physical

component, and the main source of profit is intellectual property (IP) owned by the related party. This complicates the selection of the tested party, especially when both parties to the transaction make significant intangible contributions.

Another challenge of digitalization is determining the appropriate profit level indicator (PLI). Under TNMM, typical indicators include return on costs (ROS), return on sales (RPM), and return on assets (ROA). However, for platform-based solutions or cloud services, these indicators may not reflect the actual value distribution. For instance, SaaS-model companies may incur high initial software development costs and have near-zero marginal costs, leading to distorted profitability calculations unless proper adjustments are made.

In today's digital economy, enterprises engaged in controlled transactions must ensure not only the correct selection of the TP method but also careful documentation justifying the method chosen, the tested party, and the profitability indicators used. Having clear, logical, and well-supported documentation significantly reduces the risks of tax disputes, penalties, and reassessments.

Despite the widespread use of TNMM in Ukraine, its application should be well-grounded. A company should document:

- why other TP methods (CUP, Resale Price, Cost Plus, Profit Split) are less appropriate;

- the limited availability of comparable transactions;

- constraints on using internal comparables;

- how TNMM ensures the most accurate market-based assessment of profitability.

It is advisable to describe the rationale behind the decisions, for instance: "Since comparable uncontrolled transactions under identical conditions are absent in the market, and reliable profitability benchmarks by activity type are available in commercial databases, TNMM has been selected as the most appropriate method".

One of the main decisions when applying TNMM is determining the tested party. This should be the party to the controlled transaction that:

- performs the least complex functions;

- does not own unique intangible assets;

- does not assume significant commercial risks;

- can be easily subjected to reliable comparative financial analysis.

In practice, this often refers to a Ukrainian distribution company that purchases goods from a related foreign entity (manufacturer) and sells them on the Ukrainian market. In such cases, the Ukrainian company is the tested party, as it performs basic functions (procurement and sales, warehousing, logistics, etc.), does not engage in IP development or strategic marketing, and thus, its profitability is objectively comparable with other distributors.

This selection should be supported by a functional analysis (TAR or FAR) which is a detailed description of the functions, assets, and risks of each party involved.

The Transactional Net Margin Method allows for the use of various Profit Level Indicators (PLIs). The most common of them include:

- Operating profit / Revenue (EBIT / Revenue). This PLI, also known as Return on Sales (ROS) or Operating Margin, is suitable when the company's profitability is primarily driven by its sales volume, and it doesn't rely heavily on tangible assets to generate that profit. It's often used for distributors, sales companies, or routine service providers that act as intermediaries. The idea is that their profit is a function of the sales they generate.appropriate when the company generates profit primarily through sales volume without intensive asset use.

— Operating profit / Operating expenses (EBIT / Operating expenses) This PLI, often referred to as Net Cost Plus Margin or Berry Ratio (when applied to gross profit/operating expenses), is particularly relevant for service providers or low-margin distribution activities. For service companies, a significant portion of their costs are operating expenses (salaries, overhead), and their profit is closely tied to how efficiently they manage these costs. It's less affected by differences in product mix or inventory management compared to revenue-based PLIs.

— Operating profit / Operating assets (EBIT / Assets). This PLI, also known as Return on Assets (ROA), is ideal for asset-intensive companies such as manufacturers, logistics companies, or capital-intensive service providers. In these types of businesses, the generation of profit is directly linked to the effective utilization of their assets (property, plant, equipment, inventory). This PLI assesses how efficiently the company is using its assets to generate operating profit.

— Net margin. While "Operating profit / Revenue" is a form of net margin, "Net margin" can sometimes be used as a broader, aggregate measure when the specific nuances of operating profit, revenue, and assets are less critical or when a high-level overview is sufficient. However, for precise transfer pricing analysis, the more specific PLIs (like EBIT/Revenue, EBIT/Operating expenses, or EBIT/Assets) are generally preferred as they provide a clearer link between the profit and the value drivers of the business.

The choice of PLI should be based on the actual functional profile of the tested party and properly substantiated. For example, if the company does not have production assets, a PLI such as "EBIT/Assets" would be inappropriate. It is advisable to compare several indicators in the technical annex, but to use only the most relevant one as the primary indicator.

To document the arm’s length nature of the selected PLI, the company has to:

— conduct a search for comparable companies using international databases (e.g., Orbis, Amadeus, RoyaltyRange);

— exclude companies with significant intangibles, persistent losses, restructurings, or one-off events;

— apply multi-step screening filters based on geography, industry, size;

— document the selection process, including SIC/NACE codes, reporting periods, and cleansing parameters.

The documentation should explain how the selected sample corresponds to the tested party's business model, and why the companies in the sample are sufficiently comparable.

After building the sample, the following comparisons should be made:

— the actual profitability of the tested party;

— the profitability range of comparable companies (e.g., 25th–75th percentile);

— a factual vs. benchmarked analysis.

In the event of deviations, the company should provide an explanation or make appropriate adjustments.

A three-year average of profitability is recommended to smooth out temporary effects.

Following the main narrative in the documentation, technical annexes should be prepared, including:

— explanation of the method and tested party selection;

— PLI calculation tables (actual and benchmarked);

— functional matrices (TAR or FAR analysis);

— screenshots from the databases used for comparable companies;

— risk assessments and tax adjustment reserves (if needed).

These annexes are a powerful tool during audits and demonstrate the company's good faith and transparency.

A comprehensive approach to transfer pricing documentation under TNMM includes three main components: a rational choice of the tested party, a relevant profit level indicator, and a well-substantiated comparable company analysis. In the context of digitalization and automated tax control — especially in light of the new requirements from 2025 — well-prepared documentation is not only a legal obligation but also a strategic tool for protecting business interests.

Conclusions

Ukrainian legislation needs harmonization with international standards, especially concerning terminology (e.g., “Net Profit Method” vs. TNMM) and the methodology of functional analysis (e.g., DEMPE).

The digital transformation of tax systems creates new opportunities for automated control, electronic documentation, and profitability analysis, which underpin the application of TNMM.

Traditional TNMM indicators (ROS, RPM, ROA) are not always effective under digital business models. For SaaS companies, it is recommended to use alternative indicators, such as NOPAT / Invested Capital (IC) or Contribution Margin / Revenue.

The selection of the tested party in digital transactions requires deeper analysis, as key assets (e.g., software, algorithms, data) are often owned by related parties.

The development of digital tools (e.g., platforms for Master File submission, CbCR analytics, AI-based risk assessment systems) is a critical step in combating tax evasion but requires investment in technical infrastructure and staff training.

International cooperation (e.g., participation in the BEPS Inclusive Framework, Pillars 1 and 2, JITSIC) is becoming a necessary condition for effective transfer pricing control, especially for companies without physical presence in the country.

References

Cabinet of Ministers of Ukraine. (2010). *Tax Code of Ukraine* (No. 2755-VI of December 2, 2010). https://zakon.rada.gov.ua/laws/show/2755-17

Deloitte. (2024). *Tax authorities in Ukraine mistakenly apply Platts rules for transfer pricing*. https://gmk.center/en/news/tax-authorities-in-ukraine-mistakenly-apply-platts-rules-for-transfer-pricing-deloitte

EY. (2023). *European Commission proposes BEFIT and Transfer Pricing Directives*. https://taxnews.ey.com/news/2023-1537-european-commission-proposes-befit-and-transfer-pricing-directives

IMF. (2020). *Tec(h)tonic shifts: Taxing the "digital economy"*. https://www.imf.org/en/Publications/WP/Issues/2020/05/29/Tec-h-tonic-Shifts-Taxing-the-Digital-Economy-49363

IMF. (2020). *Ukraine: Technical assistance report — A follow-up on distributed profit tax, BEPS implementation, voluntary disclosure program, and indirect methods for determining taxable income* (IMF Country Report No. 2020/357). https://www.imf.org/en/Publications/CR/Issues/2020/11/17/Ukraine-Technical-Assistance-Report-A-Follow-Up-on-Distributed-Profit-Tax-BEPS-49897

Ivchenko, O. (2025). *Transfer pricing in Ukraine: Recent changes and current requirements of 2025*. https://biz.ligazakon.net/analitycs/234433_transfertne-tsnoutvorennya-v-ukran-ostann-zmni-ta-aktualn-vimogi-2025-roku

KPMG Ukraine. (2025). *Ukraine: Updates to scope of "controlled transactions" for transfer pricing purposes*. https://kpmg.com/us/en/taxnewsflash/news/2025/02/ukraine-updates-scope-controlled-transactions-transfer-pricing-purposes.html

Krauze, M. M. (2015). *Impact of cloud computing on permanent establishments under the OECD Model Tax Convention*. https://news.bloomberglaw.com/tech-and-telecom-law/impact-

of-cloud-computing-on-permanent-establishments-under-the-oecd-model-tax-convention

OECD. (2022). *Transfer pricing guidelines for multinational enterprises and tax administrations*. OECD Publishing. https://www.oecd.org/en/publications/oecd-transfer-pricing-guidelines-for-multinational-enterprises-and-tax-administrations-2022_0e655865-en.html

OECD. (2024). *BEPS Action 13: Country-by-country reporting implementation package*. OECD/G20 Base Erosion and Profit Shifting Project. https://www.oecd.org/en/topics/policy-issues/base-erosion-and-profit-shifting-beps.html

OECD. (2024). *Statement by the Co-Chairs of the OECD/G20 Inclusive Framework on BEPS*. https://www.oecd.org/en/about/news/announcements/2024/05/statement-by-the-co-chairs-of-the-oecdg20-inclusive-framework-on-beps.html

OECD. (2025). *Tax administration digitalisation and digital transformation initiatives*. OECD Publishing. https://www.oecd.org/en/publications/tax-administration-digitalisation-and-digital-transformation-initiatives_c076d776-en.html

OECD/G20 Inclusive Framework on BEPS. (2021). *Progress report July 2020 – September 2021*. https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/oecd-g20-inclusive-framework-on-beps-progress-report-july-2020-september-2021_4b4684a0/4e30e26d-en.pdf

Stepanenko, O., Travinska, S., & Mykhalska, O. (2024). Transfer pricing in multinational corporations: Risks for the tax system of Ukraine and ways to minimize them. *Ekonomika ta suspilstvo – Economy and Society*, *59*. https://economyandsociety.in.ua/index.php/journal/article/view/3458/3386

World Bank. (2021). *Why tax administrations are embracing digital transformation*. World Bank Blogs. https://blogs.worldbank.org/en/voices/why-tax-administrations-are-embracing-digital-transformation

Received: 07.10.2025
Revised: 07.12.2025
Accepted: 07.15.2025
Published: 07.16.2025