

Transfer pricing aspects of business restructurings : valuation methods and strategy

1<sup>st</sup> PART

VALUATION METHODS ANALYSIS

COMPARATIVE ANALYSIS

Traditional valuation methods

OECD Guidelines  
Arm's length principle  
Associated enterprises

VALUATION MODEL

- Convergences/divergences
- Amendments :
  - Tax effects
  - Discount factor
  - Synergies/location savings

**Analysis of the German Guidelines**  
*Hypothetical arm's length test*

**Research Question** : assess the impact of valuation rules on MNE's strategy and performance

2<sup>nd</sup> PART

THE MNE'S STRATEGY AND PERFORMANCE

STRATEGY

PERFORMANCE

"TAX STRATEGY"

- Influence of :
- Effective tax rate
  - Tax incentives
  - Profit shifting

"OPERATIONAL STRATEGY"

- Influence of :
- R&D attractiveness
  - Availability of human and material resources
  - Synergies and location savings

Tobin's Q

Return on Assets