Transfer Pricing Aspects of Intra-group Financing

...background...

Arm’s Length Principle

CUP Method  Profit Split Method  Cost Plus Method

Creditworthiness  Terms and conditions  Volume

...is the arm’s length principle (based on the comparability approach) still the best way of pricing intra-group financing after the crisis?

Research question:
How to price intra-group financial transactions (e.g. loans, guarantees and cash pooling) under transfer pricing rules?

corporate finance theories (e.g. risk based approach)?

accounting theories (i.e. fair value approach)?

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