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## **THEORETICAL AND METHODOLOGICAL BASES OF TRANSFER PRICING: HISTORY, APPROACHES AND MODERN CONCEPTS IN ACCOUNTING**

The article examines theoretical approaches to the interpretation of the essence and content of transfer pricing in foreign and domestic scientific thought. It is determined that the formation of the transfer pricing concept is directly related to the processes of globalization of the world economy, the development of multinational corporations, and the intensification of international economic relations. Scientific approaches of foreign researchers regarding the role of transfer pricing in ensuring corporate competitiveness, optimizing financial results, planning tax payments, and minimizing tax risks are analyzed. It is established that the arm's length principle occupies an important place in the modern transfer pricing concept, as it is aimed at ensuring the market nature of controlled transactions and preventing tax avoidance. The approaches of Ukrainian scholars to the interpretation of the economic and legal nature of transfer pricing are systematized. It is revealed that domestic studies consider transfer pricing as a management tool, a mechanism for tax optimization, and a method of distributing resources and profits among structural divisions and related parties. It is proved that the absence of a unified scientific approach to defining the essence of transfer pricing is caused by the complexity and multidimensionality of this economic phenomenon, as well as by the relatively recent implementation of transfer pricing mechanisms into the practice of economic activity in Ukraine. The necessity for further development of theoretical and methodological foundations of transfer pricing and improvement of mechanisms for its state regulation is substantiated.

**Keywords:** transfer pricing, transfer price, arm's length principle, multinational corporations, tax planning, controlled transactions, tax optimization, economic and legal nature, globalization, competitiveness.