Office Hours:
Monday and Wednesday: 2:30pm – 4:00pm and after class (or by appointment)

Textbook:
There is no assigned textbook. Course readings will be provided thru Canvas or email.

Overview:
This course will introduce students to the economics of transfer pricing. Transfer pricing involves finding reliable intercompany pricing in situations where free markets do not exist and accounts for over half of all international trade. Given the extent of globalization in the current business environment, multinational enterprises must address transfer pricing issues on a day to day basis. Taxing authorities throughout the world have instituted transfer pricing legislation to claim their “fair share” of profits from the multinational enterprise’s global income. As a result, this field has attracted significant attention from policy makers and businesses.

Examinations and Grading Policy:
The course will consist of various homework/assigned projects based on specific course content and a final project encompassing the full course content. The homework/assigned projects will be discussed in class at the time of their assignment along with relevant due date for completion. The final project must be turned in by Sunday, December 16, 2018.

Failure to turn in an assignment will lead to a score of zero for that assignment.

Homework/assigned projects: 65% - assigned throughout the course.
Final project: 35% - assigned approximately the week of December 3.

The course project assignments will require the use of the Standard & Poor’s Net Advantage database. This is accessible from the library website with your NetID. Either of the below links will take you to the database login page.
https://business.library.emory.edu/research-learning/databases/standard-poors.php

Honor Code Violations will be dealt with decisively (failing grade and expulsion from school).

“The honor code is in effect throughout the semester. By taking this course, you affirm that it is a violation of the code to cheat on exams, to plagiarize, to deviate from the teacher's instructions about collaboration on work that is submitted for grades, to give false information to a faculty member, and to undertake any other form of academic misconduct. You agree that the teacher is entitled to move you to another seat during examinations, without explanation. You also affirm that if you witness others violating the code you have a duty to report them to the honor council.”
**Expected Student Conduct:**

- Please do not miss any class. It is important to attend all classes.
- Please be on time. Late arrival disturbs the discussion.
- Please silence your mobile phone during class.
- Participation and questions are always encouraged.

**About Canvas:**

Canvas is a communication medium used to make announcements, distribute handouts and lectures, post reading material, collect assignments, and record and distribute grades. To get to the Canvas main page go to [https://classes.emory.edu](https://classes.emory.edu) and then use your e-mail ID and Password to log in and select our course. If you cannot log in, you perhaps have difficulty with your e-mail (network) ID and password. You may contact classes@emory.edu for any problems or questions you might have. There are several navigation buttons on the entry page that help organize and classify information.

**General Course Outline:**

*Weeks 1-4:* General overview of transfer pricing. The regulatory aspects of transfer pricing. How to conduct a transfer pricing analysis.

*Weeks 5-8:* Transfer pricing analyses involving tangible property transactions within a firm.

*Weeks 9-11:* Transfer pricing analyses involving services transactions within a firm.

*Weeks 12-15:* Transfer pricing analyses involving intangible property transactions within a firm.

*Week 16:* Discussion and assignment of final project.
Reading List and Course Schedule (subject to change as the course progresses):

I: Overview of transfer pricing. Why multinational enterprises (“MNEs”) and governments are concerned with transfer pricing. Attacks/challenges to transfer pricing polices utilized by MNEs and responses by governments. The regulatory aspects of transfer pricing. The meaning of the arm’s length standard. The importance of functions, risks, and assets in transfer pricing. Types of transactions among MNEs. Conducting a transfer pricing analysis.

Classes #1 thru #6 (August 29, September 5, September 10, September 12, September 17, and September 19 (no class September 3))

Course readings:

- U.S. Department of Treasury, Treas. Reg. § 1.482-1.
- OECD, *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations*, July 2017, Chapter I, Chapter II (Part I), Chapter III.
- European Commission, Starbucks State Aid Decision Letter to the Netherlands, June 2014.

II: Transactions involving tangible property. Analyses of tangible property transactions. The challenges of analyzing tangible property transactions.

Classes #7 thru #12 (September 24, September 26, October 1, October 3, October 15, and October 17 (no class October 8 and October 10))

Course readings:

III: Transactions involving intercompany services. Analyses of services transactions. The challenges of analyzing services transactions.

Classes #13 thru #18 (October 22, October 24, October 29, October 31, November 5, and November 7)

Course readings:

IV: Transactions involving intangible property. Analyses of intangible property transactions. The challenges of analyzing intangible property transactions.

Classes #19 thru #24 (November 12, November 14, November 19, November 26, November 28, and December 3 (*no class November 21*))

Course readings:

V: Final course project assignment and discussion.

Classes #25 thru #26 (December 5 and December 10)

Course readings:
- N/A