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Digital Services Tax: Impacts on Multinational Enterprises and Transfer Pricing Adjustments

Mujtaba Saeed

Institute of Chartered Accountants of Pakistan
Institute of Chartered Accountants of England and Wales, UK
Corresponding Email: mujtabasaeedms@hotmail.com

Abstract

This paper examines the implications of Digital Services Tax (DST) on Multinational Enterprises (MNEs) and the resulting need for Transfer Pricing (TP) adjustments. It provides an overview of DST frameworks, highlights key affected sectors such as technology and e-commerce, and discusses the financial and operational impacts on MNEs. The paper also explores the relationship between DST and TP, the OECD's Pillar One and Pillar Two proposals, and legal, regulatory, and economic challenges. Future trends in digital taxation and recommendations for MNEs regarding risk management, compliance strategies, and global tax reform advocacy are also addressed.

Keywords: Digital Services Tax, DST, Multinational Enterprises, Transfer Pricing, OECD, Pillar One, Pillar Two, Global Tax Reform, Compliance, Taxation.

1. Introduction

The Digital Services Tax (DST) is a relatively new form of taxation designed to address the unique nature of the digital economy. Unlike traditional business models, digital companies often generate significant revenues in countries where they do not have a physical presence, which creates a gap in taxation systems that have traditionally relied on taxing profits based on physical locations[1]. DST specifically targets revenues from digital activities such as online advertising, digital platforms, and the sale of user data. By doing so, DST seeks to ensure that digital businesses contribute their fair share of taxes in the countries where they have significant user bases, even without a physical footprint. DST typically applies to revenues generated from specific digital services, such as targeted advertising, social media platforms, and e-commerce intermediaries. Its rationale stems from the perceived imbalance in how multinational digital companies pay taxes compared to traditional brick-and-mortar businesses. Many digital firms are able to shift profits to low-tax jurisdictions, reducing their overall tax liability. DST aims to address this by taxing the revenues that companies generate from digital services

within a country, irrespective of where the company is headquartered. The rationale is rooted in ensuring tax fairness and protecting local businesses from being outcompeted by large, often tax-advantaged global tech firms. The concept of a DST first gained traction in Europe, particularly in France, which implemented one of the earliest and most prominent DST regimes in 2019. The European Union had proposed a unified DST, but disagreements among member states led to individual countries like the UK, Italy, and Spain adopting their own versions. Since then, various countries across the globe, including India, Kenya, and Turkey, have introduced their own DSTs. While the rates and specifics of these taxes vary by jurisdiction, the underlying principle remains consistent: taxing digital businesses based on their local revenues. The global adoption of DST has been a response to growing frustration over the inability of existing tax frameworks to capture the value created by the digital economy in specific markets. For Multinational Enterprises (MNEs), particularly those in the tech sector, DST represents a significant shift in their tax obligations. Many MNEs generate substantial revenue from digital services in various markets without having a physical presence in those countries. DST forces these companies to reconsider their tax planning strategies, as it introduces a new layer of tax liability based on local revenue rather than profit. Additionally, the introduction of DST across different jurisdictions creates complexities, as companies must now comply with diverse tax rules and rates. For MNEs, DST not only increases their tax burden but also requires them to reassess their global tax compliance strategies and may lead to changes in business models to minimize exposure to DST. This paper seeks to explore the implications of DST on multinational enterprises, with a particular focus on how it affects transfer pricing and tax planning strategies. By analyzing the structure of DST in various jurisdictions, this paper will examine the challenges MNEs face in navigating these new tax obligations and how they can adapt their transfer pricing policies to remain compliant. Additionally, the paper will explore the broader economic and policy impacts of DST, including its potential to reshape global tax frameworks and its role in ongoing discussions around international tax reform. The objective is to provide a comprehensive understanding of DST's impact on MNEs and offer insights into potential future developments in the realm of digital taxation[2].

2. Digital Services Tax Framework

The Digital Services Tax (DST) is designed to capture revenue from digital activities that are not effectively taxed under traditional corporate tax systems. Unlike corporate income taxes that apply to profits, DST applies to specific revenue streams from digital services, regardless of the company's profitability in a given market. The core elements of DST include the types of digital activities subject to the tax, the location where the tax is applied (often based on user or customer presence), and the thresholds for taxation. These elements are structured to ensure that large multinational enterprises (MNEs)

generating substantial revenue from digital services contribute taxes in the countries where they operate, even without a physical presence there.

Figure 1 **Digital Services Tax Framework**

DST primarily targets revenues from specific digital services, including online advertising, digital platforms, and user data monetization. For example, digital advertising revenue generated by tech giants like Google and Facebook is subject to DST in several jurisdictions. Other taxable services include intermediary services provided by online marketplaces (such as Amazon or eBay), where the platform facilitates transactions between buyers and sellers. Additionally, revenue from selling or monetizing user data, which is common among social media platforms, is also a taxable stream under many DST frameworks. These revenue streams are chosen because they often involve user participation in the taxed country, even though the company may have no physical presence there. DST is typically designed to target large digital companies by applying specific revenue thresholds. For instance, France's DST applies to companies with global revenues exceeding €750 million, with at least €25 million derived from French users. Similarly, the UK applies its DST to businesses with over £500 million in global digital services revenue and £25 million generated from UK users[3]. The tax rates for DST also vary by country, with most rates ranging from 2% to 7.5%. For example, France levies a 3% DST, while India's equalization levy (a form of DST) is set at 2%. These thresholds ensure that smaller businesses and startups are exempt, focusing the tax burden on large multinational corporations. Countries adopting DST include major economies like France, the UK, Italy, Spain, India, and Turkey, each with its own variations in scope, thresholds, and rates. One of the key distinctions between DST and traditional corporate tax frameworks is that DST applies

to revenue rather than profits. Traditional corporate tax regimes generally tax profits earned within a jurisdiction, and companies can often reduce taxable income through deductions, credits, and profit-shifting strategies. In contrast, DST is based on gross revenues from digital services, making it a more direct form of taxation that is harder to avoid. This shift from profit-based to revenue-based taxation marks a significant departure from conventional tax rules and raises new challenges for MNEs operating across multiple jurisdictions with diverse DST regulations[4].

3. Impact on Multinational Enterprises (MNEs)

Multinational Enterprises (MNEs), especially those operating in the digital economy, are significantly impacted by the introduction of Digital Services Tax (DST). Companies that generate revenue from digital services across multiple jurisdictions, particularly those with large user bases in countries that have implemented DST, are exposed to new tax liabilities. The scope of exposure depends on the specific structure of the business, the revenue streams involved, and the countries in which they operate. MNEs with global digital platforms, such as social media networks, search engines, and e-commerce marketplaces, are particularly vulnerable to these new tax regimes, as they often do not have a substantial physical presence in the countries where their services are consumed. The sectors most affected by DST include technology, e-commerce, and digital advertising. Technology companies, especially those that offer platform-based services like cloud computing, software as a service (SaaS), and digital content delivery, face a direct impact due to their global user bases. E-commerce platforms that facilitate online transactions are also significantly affected, particularly those operating across multiple countries without local operations. The digital advertising sector is another major target of DST, as companies like Google and Facebook generate large revenues through targeted advertising based on user data from countries worldwide. These sectors are prime targets of DST because they derive substantial income from digital activities without a corresponding taxable presence under traditional tax frameworks. The introduction of DST creates several financial implications for MNEs. First, it directly increases the tax burden on affected companies by imposing taxes on revenue rather than profits. This shift can have a significant impact on profit margins, especially for firms with lower margins or those operating in highly competitive markets. In addition to higher tax liabilities, MNEs may also face increased operational costs associated with compliance, as they must now navigate different DST regimes in multiple jurisdictions. The financial burden of DST can be further compounded by the potential for double taxation, as some countries may not provide relief for taxes paid under DST regimes.

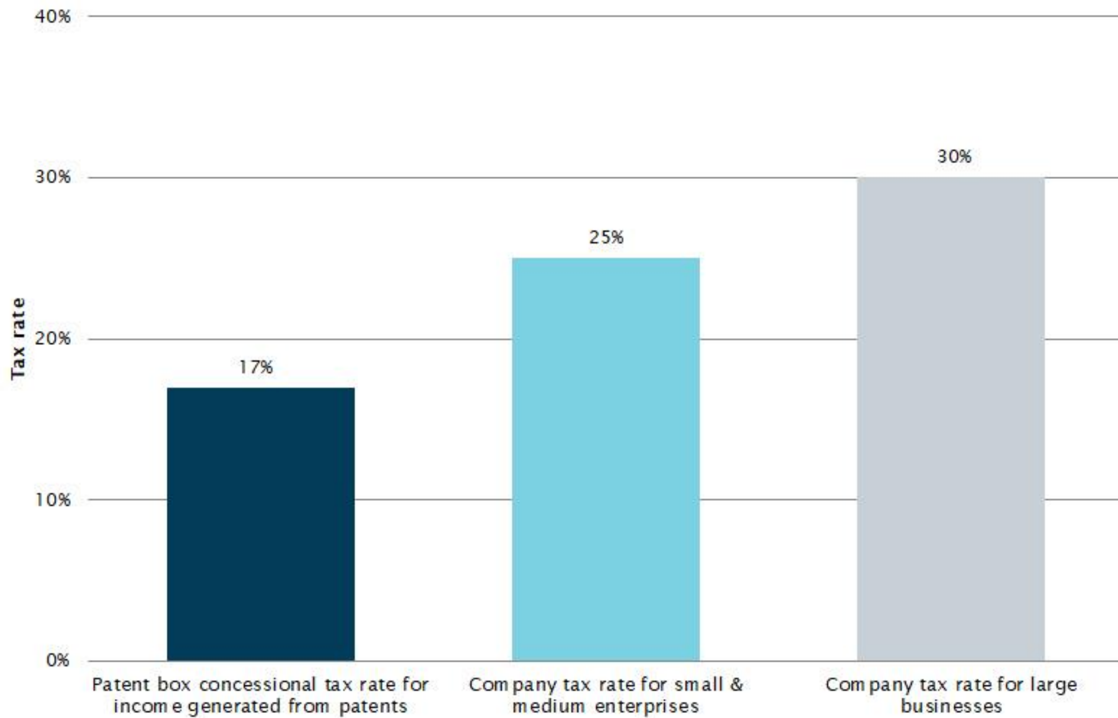

Figure 2 Impact on Multinational Enterprises (MNEs)

To mitigate the effects of DST, MNEs are adopting various strategic responses. One common approach is tax planning and restructuring, where companies reassess their corporate structures and revenue flows to minimize DST exposure. This may involve shifting certain activities or revenues to jurisdictions with lower or no DST. Compliance strategies are also evolving, as companies invest in new systems to accurately track and report revenue from digital services across different countries. Additionally, some MNEs are considering adjustments to their market and service delivery models, such as passing the cost of DST onto consumers through higher prices, altering service offerings, or reducing investment in certain markets where DST significantly impacts profitability[5].

Table 1 Financial Impact and Strategic Responses to DST for MNEs

Category	*Details*
Affected Sectors	*Technology, e-commerce, digital advertising, online marketplaces*
Financial Implications	*- Increased tax liabilities due to revenue-based taxation* *- Reduced profit margins, especially for low-margin businesses* *- Higher operational costs*
Profit Margins and Tax	*- Revenue-based taxation limits ability to deduct expenses*

Burden	*- Companies face taxes on gross revenue, impacting overall profitability*
Operational Costs	*- Increased compliance and reporting costs across multiple jurisdictions* *- Potential for double taxation due to lack of relief mechanisms*
Strategic Responses	*- Tax planning to minimize exposure* *- Restructuring of revenue flows* *- Adjusting prices or service models* *- Enhanced compliance measures*
Market Adaptations	*- Passing DST costs to consumers* *- Reducing investment in high-tax jurisdictions* *- Changes in product or service delivery to limit DST exposure*

This table highlights how DST impacts key financial metrics for MNEs and outlines common strategies adopted in response to the challenges posed by this new tax framework[6].

4. Transfer Pricing Adjustments and DST

Transfer Pricing (TP) refers to the rules and methods for pricing transactions between related entities within a multinational enterprise (MNE). TP ensures that transactions such as the sale of goods, services, or intangibles between subsidiaries of the same corporation are priced as if they occurred between independent parties. With the introduction of Digital Services Tax (DST), the relationship between TP and DST becomes more complex, as DST taxes revenue in countries where value is generated from digital services, irrespective of the MNE's physical presence or profit generation. Consequently, MNEs are forced to reconsider their TP frameworks to align with the new realities imposed by DST. In the context of MNEs, TP plays a critical role in allocating profits across different jurisdictions based on the value creation within each entity. The arm's length principle, which requires that intra-group transactions be priced as if they were conducted between unrelated parties, forms the cornerstone of TP regulations. Traditionally, this has helped ensure that profits are allocated to countries where real economic activity takes place, such as production or service provision. However, in the digital economy, value creation is often driven by user participation and data collection, which creates challenges in applying traditional TP methods when countries introduce DST to tax local revenues from digital services. DST introduces several challenges to existing TP frameworks. Unlike traditional corporate taxes, which are based on profit, DST is levied on revenue, disregarding whether a business is profitable in a particular market. This disconnect between DST and profit-based taxation complicates profit

allocation under TP. MNEs must now balance the requirements of DST with traditional TP principles, leading to potential conflicts in the allocation of revenues and costs across subsidiaries. For instance, while TP frameworks focus on the allocation of profits based on where tangible and intangible assets are located, DST shifts the focus to where user-generated value occurs, which may require adjusting intercompany pricing and cost-sharing agreements. Given the revenue-based nature of DST, MNEs must adjust their TP policies to reflect the new tax liabilities introduced by DST. This involves revisiting the pricing of intercompany transactions, particularly in jurisdictions where DST applies.

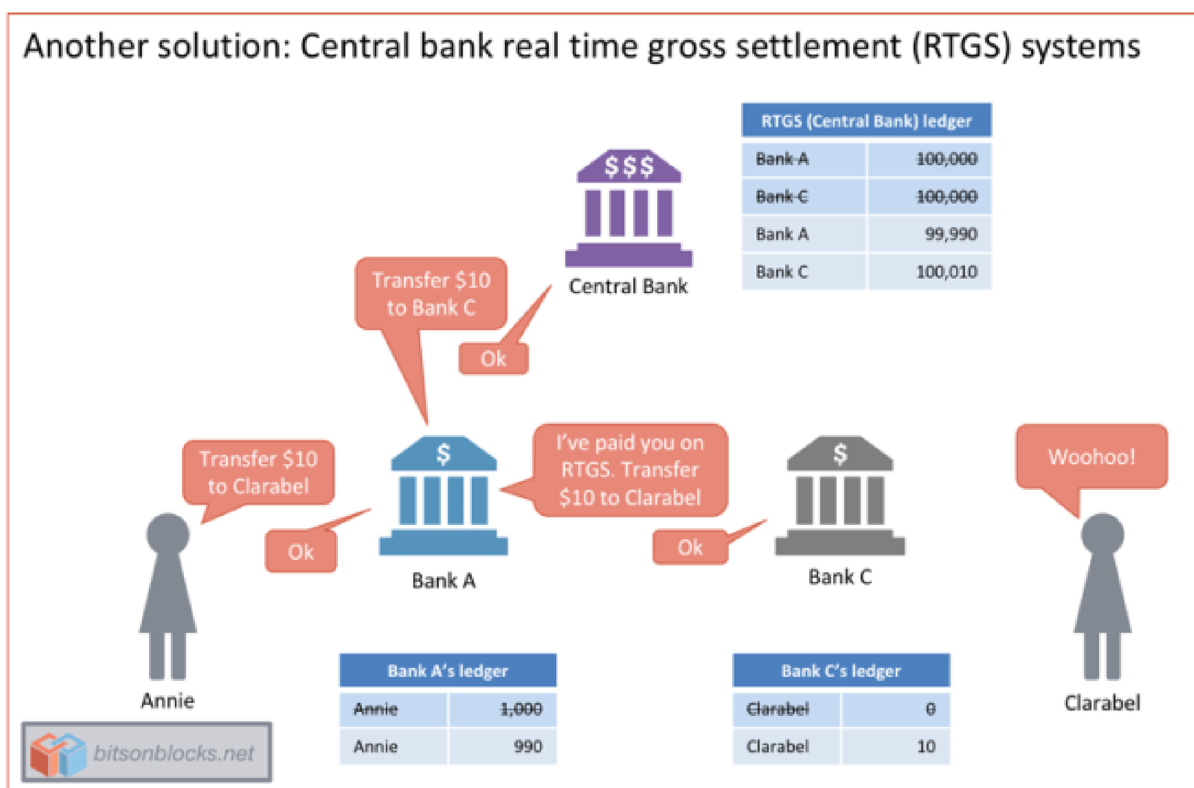

Figure 3 Transfer Pricing Adjustments and DST

Companies need to ensure that transfer prices appropriately reflect the value generated by digital services in these countries, which may require adjustments to intercompany charges for services like digital advertising, user data management, and platform hosting. Additionally, as DST targets revenue instead of profits, MNEs must carefully reassess how profits are allocated along the value chain to avoid double taxation and ensure compliance with both DST and TP rules. One of the key areas of adjustment for MNEs is the pricing of intercompany transactions related to digital services. For example, if a company provides digital marketing or user data analytics services from one subsidiary to another, the pricing of these services must be aligned with both TP and DST requirements. MNEs may need to implement new models for determining the

arm's length price of intercompany transactions that account for DST liabilities in the jurisdictions where users reside. This also impacts the overall profit allocation along the value chain, as companies may need to attribute more profit to jurisdictions with higher DST exposure, changing how profits are distributed across different entities within the group. Several companies have already made adjustments to their TP frameworks in response to DST. For instance, large digital advertising companies have restructured their revenue flows by creating new entities in countries where DST applies. These entities are responsible for generating and reporting local revenue, allowing the company to comply with DST while maintaining an arm's length pricing policy for intercompany transactions. Another example comes from e-commerce platforms that have adjusted the pricing of services offered between subsidiaries to reflect the higher tax burdens imposed by DST in certain markets, such as France and the UK. These adjustments help MNEs navigate the dual challenges of TP compliance and DST liabilities[7].

Table 2 Impact of DST on Transfer Pricing Adjustments

Category	*Details*
Challenges to TP Frameworks	*- DST taxes revenue, while TP focuses on profit allocation* *- Difficulty in aligning profit-based TP with revenue-based DST*
Intercompany Pricing	*- Adjustments required for pricing digital services (e.g., user data management, digital advertising)* *- Need for arm's length pricing models*
Profit Allocation	*- More profit may need to be attributed to jurisdictions with DST exposure* *- Impacts on overall value chain profit distribution*
Compliance Strategies	*- Revisiting cost-sharing agreements and intercompany charges* *- Structuring entities to manage DST liabilities and TP compliance*
Case Study Examples	*- Digital advertising companies restructuring revenue flows* *- E-commerce platforms adjusting pricing in DST-affected jurisdictions*

This table highlights the primary challenges and adjustments MNEs face when aligning their TP policies with DST regulations, emphasizing key areas like intercompany pricing, profit allocation, and compliance strategies[8].

5. OECD's Pillar One and Pillar Two Proposals

The Organisation for Economic Co-operation and Development (OECD) introduced its Pillar One and Pillar Two proposals as part of a broader effort to reform international tax rules in response to the challenges posed by the digital economy. Pillar One focuses on reallocating taxing rights, particularly concerning multinational enterprises (MNEs) that generate significant revenue in countries where they do not have a physical presence. This proposal seeks to allocate more taxing rights to market jurisdictions based on user participation and value creation. Pillar Two, on the other hand, establishes a global minimum tax to address base erosion and profit shifting (BEPS) by ensuring that MNEs are subject to a minimum level of taxation, regardless of where they operate. Pillar One introduces a new framework for reallocating profits and taxing rights for the largest and most profitable MNEs, particularly those in the digital sector. The goal is to shift some of the tax base from the traditional residence countries to market countries, where the users and customers of digital services are located. Pillar Two, with its global minimum tax of at least 15%, aims to reduce tax competition between jurisdictions and prevent MNEs from shifting profits to low-tax jurisdictions. Together, these measures represent a significant shift in global tax policy, targeting both the allocation of profits and ensuring a fairer distribution of tax revenues across countries. The OECD's proposals interact directly with the Digital Services Tax (DST) implemented by several countries. DST is seen as an interim measure to capture tax revenue from digital activities, while the OECD's Pillar One provides a more comprehensive solution to the taxation of digital services. In theory, if Pillar One is successfully implemented, it could replace DST by addressing the root issue of taxing rights for digital activities. However, the transition from DST to a global agreement under OECD reforms may take time, as countries need to reach consensus on key elements such as the scope of companies affected and the mechanisms for reallocating taxing rights.

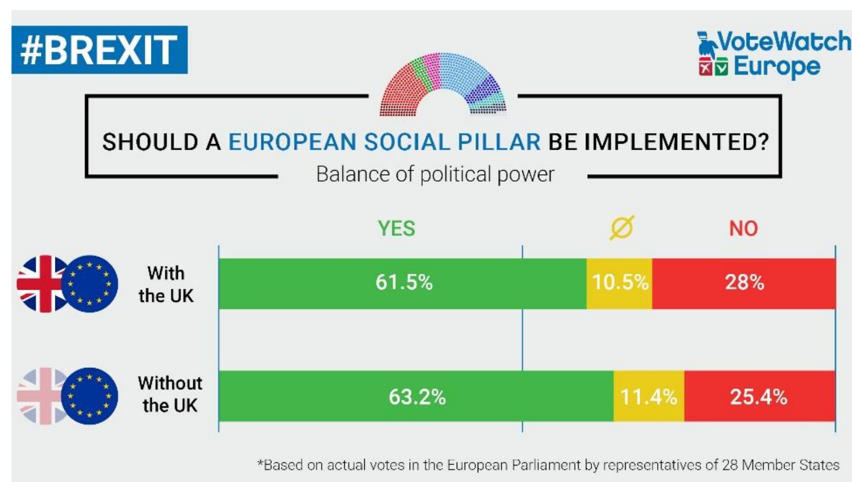

Figure 4 . OECD's Pillar One and Pillar Two Proposals

One of the potential outcomes of the successful implementation of the OECD's global tax reform is the phasing out of DST. Several countries, including France and the UK, have indicated that their DST regimes are temporary and will be withdrawn once a multilateral agreement is reached. Pillar One's reallocation of taxing rights is designed to address many of the concerns that led to the introduction of DST, particularly the issue of taxing digital services in jurisdictions where companies do not have a physical presence. If a global agreement is reached, countries may agree to eliminate DST to avoid double taxation and reduce administrative burdens on MNEs. The OECD’s proposals will have significant implications for MNEs' transfer pricing (TP) policies. Under Pillar One, MNEs may need to adjust their TP models to reflect the new rules for reallocating profits to market jurisdictions. This will require careful coordination between traditional TP principles and the new frameworks for profit allocation based on user participation and market presence. Pillar Two, with its global minimum tax, will also affect TP policies by reducing the tax advantages of shifting profits to low-tax jurisdictions, thus incentivizing companies to reassess their global tax strategies. MNEs may need to integrate both the OECD's reforms and DST-related adjustments into a unified TP approach[9].

Table 3 Comparison of DST and OECD Pillar One/Pillar Two Proposals

Category	*DST*	*OECD Pillar One*	*OECD Pillar Two*
Objective	*Tax digital services revenue in market jurisdictions*	*Reallocate taxing rights to market jurisdictions*	*Introduce a global minimum corporate tax*
Tax Base	*Revenue-based taxation*	*Profit-based taxation (reallocated profits)*	*Ensures minimum tax rate on corporate profits*
Scope	*Targets digital service providers (tech, e-commerce)*	*Largest and most profitable MNEs, particularly in tech*	*All MNEs with revenue above a certain threshold*
Implementation	*Varies by country*	*Global framework proposed by OECD*	*Global minimum tax (at least 15%) proposed by OECD*
Potential Impact on TP	*Requires adjustments to pricing of digital services*	*Requires adjustment to profit allocation models*	*Reduces incentives for profit shifting to low-tax jurisdictions*
Future Outlook	*May be phased out if global tax agreement is reached*	*Likely to replace DST if adopted by countries globally*	*Will set a global floor on corporate tax rates*

This table provides a side-by-side comparison of the key differences and interactions between DST and the OECD's Pillar One and Pillar Two proposals, focusing on their objectives, tax bases, implementation, and implications for transfer pricing policies[10].

6. Legal and Regulatory Challenges

The introduction of DST has brought significant compliance and enforcement challenges for MNEs. One of the key issues is the complexity of complying with various DST regimes across different jurisdictions. Each country may have its own thresholds, tax rates, and definitions of taxable revenue streams, making it difficult for MNEs to develop standardized compliance practices. In some cases, MNEs are required to adjust their accounting and reporting systems to accurately track and report digital revenues subject to DST, adding further operational complexity. DST presents a risk of double taxation, as it taxes revenue rather than profit. MNEs could face tax liabilities on the same income in multiple jurisdictions, especially where both DST and traditional corporate taxes apply. This creates significant financial burdens and can lead to tax disputes between countries. Currently, dispute resolution mechanisms for DST-related issues are limited, as most tax treaties do not cover digital services taxation, leading to uncertainty about how these disputes will be resolved. This has prompted some countries and international organizations to push for multilateral solutions to address double taxation risks. The introduction of DST has led to tensions regarding the application of existing tax treaties. Most tax treaties are designed to avoid double taxation by allocating taxing rights based on physical presence and profits. However, DST imposes taxes based on revenue generated in a market jurisdiction, irrespective of physical presence. This creates conflicts with the principles outlined in many bilateral tax treaties, as they often do not account for the digital economy. MNEs may seek relief through tax treaties, but they face challenges in aligning DST with treaty obligations, further complicating their tax positions. Several MNEs have legally challenged DST regimes, arguing that they unfairly target specific sectors, particularly the tech industry,

Figure 5 . Legal and Regulatory Challenges

and violate principles of international tax law. Some have argued that DSTs are discriminatory and inconsistent with World Trade Organization (WTO) rules. While certain legal challenges have been successful in delaying or amending DST measures, others have not led to substantive changes. These legal battles highlight the ongoing tensions between governments' desire to tax digital services and MNEs' efforts to protect their financial interests under current tax laws.

7. Economic and Policy Considerations

DST has a significant economic impact on global digital services, particularly for MNEs operating in sectors like technology, e-commerce, and digital advertising. The tax increases the cost of doing business in certain markets, leading to a higher tax burden and potentially reduced profitability. Some companies may pass these costs onto consumers, resulting in higher prices for digital services. Furthermore, DST can affect competition, as larger companies with greater resources may be better equipped to manage the tax compared to smaller businesses. DST shifts the tax burden from traditional profit-based taxes to revenue-based taxes, which can create distortions in the market. MNEs may face increased tax liabilities in countries where they generate significant digital revenue but have lower profit margins. This can lead to decisions to scale back operations in certain markets or adjust pricing models. Additionally, the revenue-based nature of DST can disproportionately affect companies with lower profitability, exacerbating market distortions and leading to unintended economic consequences. The policy debate surrounding DST often centers on the balance between fair taxation and fostering economic growth. Proponents argue that DST ensures that digital companies pay their fair share of taxes in the jurisdictions where they generate value, addressing the gap in traditional

Figure 6 Economic and Policy Considerations

tax rules for the digital economy. However, opponents warn that DST may stifle innovation, discourage investment, and harm economic growth by increasing the tax burden on digital companies. The debate highlights the need to balance tax fairness with policies that support the digital economy's growth and expansion. Given the fragmented nature of DST implementation across different jurisdictions, there is growing interest in achieving global tax harmonization. International organizations like the OECD and G20 are leading efforts to create a coordinated approach to digital taxation, particularly through the OECD's Pillar One and Pillar Two proposals. Global tax harmonization could reduce the complexity and administrative burdens associated with complying with

multiple DST regimes and help address concerns about double taxation. However, achieving consensus among countries remains a significant challenge.

Table 4 Role of International Organizations in Resolving Tax Disputes

Organization	*Role in Resolving Tax Disputes*
OECD	*Leading efforts to develop global tax reform through Pillar One and Pillar Two proposals.*
G20	*Supporting global tax policy coordination and advocating for tax transparency and fairness.*
European Union	*Developing regional policies for digital taxation and addressing the impacts on member states.*
WTO	*Addressing potential conflicts between DST and international trade rules.*

This table highlights the role of key international organizations in addressing tax disputes and fostering global cooperation on digital taxation.

8. Future Outlook and Recommendations

As the digital economy continues to expand, the future of digital taxation will likely evolve. Governments are expected to introduce more refined and comprehensive frameworks to capture revenue from digital activities. Additionally, countries may move toward adopting global agreements, such as the OECD's proposals, to ensure a coordinated approach to taxing digital services. The growing digitalization of the economy will drive further discussions on how to adapt tax policies to reflect new business models and technological advancements. DST regimes are likely to evolve, particularly as more countries explore introducing their own digital taxes or adjusting existing ones. Some jurisdictions may phase out DST in favor of multilateral agreements, while others may continue to rely on these taxes to ensure fair revenue allocation. The structure of DST may also change, with governments refining thresholds, rates, and the scope of taxable services to address concerns from both MNEs and policymakers. As digitalization accelerates, tax policies will need to keep pace with new business models that do not rely on physical presence. This shift will likely lead to a greater emphasis on taxing value generated from user participation, data, and digital services. Policymakers will need to strike a balance between encouraging digital innovation and ensuring that governments capture appropriate tax revenues from these activities. To navigate the complexities of DST and transfer pricing (TP) adjustments, MNEs should adopt proactive risk management and compliance strategies. This includes conducting regular reviews of their TP policies, ensuring they align with DST regulations, and preparing for potential future changes in digital tax rules. Additionally,

companies should engage in advocacy efforts to promote global tax reform and participate in dialogues with policymakers to shape a fair and equitable digital tax system.

Table 5 Future Outlook and Recommendations

Recommendation	*Details*
Risk Management	*Develop strategies to mitigate financial risks from DST liabilities and compliance requirements.*
Compliance	*Regularly update TP policies and ensure they are in line with evolving DST regulations.*
Global Tax Reform Advocacy	*Engage in policy discussions to support efforts toward global tax harmonization.*
Digitalization Preparedness	*Stay informed on the impacts of increasing digitalization on tax obligations and strategies.*

This table summarizes key recommendations for MNEs to manage risks and ensure compliance with DST and TP adjustments.

9. Conclusion

The growing digital economy and the introduction of DST present significant challenges and opportunities for multinational enterprises (MNEs). As governments seek to capture more tax revenue from digital services, MNEs must adapt their tax planning and transfer pricing (TP) strategies to remain compliant and mitigate financial risks. The OECD's Pillar One and Pillar Two proposals offer a potential path toward global tax reform, but the transition from DST to a multilateral agreement will require careful navigation. MNEs must stay informed on evolving tax regulations, engage in proactive risk management, and advocate for fair and consistent global tax policies.

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