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An outline is given of the complex issue of transfer pricing (the cross-border intra-firm transactions between related parties), as seen by multinational enterprises (MNE) managers and by governments faced with the task of taxing business profits. First, transfer pricing from the MNE's perspective, and the problems that this raises for national governments, are briefly discussed.

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Multinational corporation - Wikipedia

The impact of the multinational enterprise (MNE) on sovereignty, autonomy, and control is addressed. It is argued that the mainstream literature of the sovereignty at bay era (which followed the first dramatic expansion of the traditional MNE) did not predict the end of the nation state or conclude that sovereignty is critically compromised either in theory or practice.

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