

**Olena Moshkovska**, Doctor of Economics, Professor,  
<https://orcid.org/0000-0002-1176-9478>  
Kyiv National University of Trade and Economics,  
Kyiv

**Yulia Manachynska**, Candidate of Economic Sciences, Associate Professor,  
<https://orcid.org/0000-0001-9155-3417>

**Volodymyr Yevdoshchak**, Candidate of Economic Sciences,  
Associate Professor,  
<https://orcid.org/0000-0001-6547-8927>  
Chernivtsi Institute of Trade and Economics of KNUTE,  
Chernivtsi

## **UKRAINIAN FOREIGN TRADE BALANCE ASSESSMENT IN THE CONTEXT OF TRANSFER PRICING**

### *Summary*

*Topicality. Formulation of the problem.* In the context of globalization of world economic development, the boundaries of transfer pricing are expanding, and it is on this basis that corporate entities can easily open branches and representative offices in countries with preferential tax terms. World experience shows that through "scheme" exports implementation quite significant amounts of capital "settle" in offshore jurisdictions. Under the conditions of offshore schemes, Ukraine does not receive a significant share of foreign exchange earnings annually, which has a negative impact on the country's economy. Accordingly, due to undercutting of tax base or fixation of negative financial results, domestic business entities evade income tax, as a result the budget receives less revenue, which encourages senior government members to make appropriate changes to the current Tax Code of Ukraine through paragraph 13 implementation of the BEPS (Base Erosion and Profit Shifting) Plan, developed by the Organization for Economic Co-operation and Development (OECD). This is what formulates the study validity.

*Aim of the study.* The purpose of the article is to study and evaluate Ukraine's foreign trade activity, with an emphasis on the agricultural sector of economy, as well as to substantiate the three-tiered transfer pricing report for agricultural enterprises in accordance with paragraph 13 of the BEPS Plan.

*Methodology.* In the investigation process we used general scientific theoretical methods of cognition: systems analysis – to clarify the main categories of research; abstract-logical method – for the implementation of theoretical generalizations and conclusions about the essence of transfer pricing in export-import operations, graphic method – for visual presentation of statistical and analytical material to reflect the foreign trade balance and commodity structure of Ukrainian exports.

*Results.* The article substantiates the main principles of the BEPS Plan paragraph 13, developed by the OECD and identifies the main components of the three-tiered structure for transfer pricing report. The content of the Law of Ukraine №1210 "On Amendments to the Tax Code of Ukraine to improve tax administration, eliminate technical and logical inconsistencies in tax legislation" is disclosed. The authors performed statistical assessment of agricultural enterprises export-import operations on the basis of the agricultural sector. The share of "scheme" exports to reduce the tax burden on income tax for domestic agricultural firms, which reduces the investment attractiveness index of agricultural enterprises in the world farmers' arena, is corroborated. It is proposed to supplement the three-tiered transfer pricing report with 3D actuarial management report, which will increase the investment attractiveness of domestic agricultural enterprises. *Practical value.* The accounting and informational filling of 3D actuarial management report is offered, which will help to create favorable conditions for domestic agricultural enterprises to attract investment into reconstruction, modernization and development of the agricultural sector.

*Prospects for further research.* Theoretical and practical substantiation of the 3D actuarial management report for domestic agricultural enterprises in order to objectively assess their investment attractiveness image; corroboration of 4D-model of power momentum management for domestic agricultural enterprises capital. Identification of factors that have a direct impact on the changes prospects for financial results of agricultural firms' economic activity in the short term perspective.

*Keywords:* transfer pricing, report, assessment, export, import, actuarial accounting, taxes.  
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