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Impact of Transfer Pricing Toward Benefits and Sustainable of Multinational Hotel Industry

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Abstract--This article discusses the impact of transfer pricing on the benefits and sustainability of the hotel industry operating in many countries. The author believes that the hotel industry is just like any other industry where the impact of transfer pricing also impacts tax reporting and the company's actual financial condition. For this reason, we have made some databases of journal publications and websites as the primary data for us to study with a phenomenological approach so that these data become valid findings in completing the discussion of this business study. The descriptive qualitative study format became the design of this study by relying on data and evidence from field studies by digitally searching in journal publications such as Taylor and Francis, Elsevier, Google books, and many national scientific publications. Based on the study results and discussion of the data, we can summarize that transfer pricing impacts revenue on the sustainability of the hotel industry internationally. Therefore, transfer pricing rules, and policies for each hotel are allowed to be directly determined following the country's rules in which it is located the hotel operated.

Keywords---benefits, hotel industry, sustainability, transfer pricing.

Introduction

Before going any further, this article tries to understand what we mean by transfer pricing. These are costs imposed by certain parties, for example, on the parent company and other industries but in the parent company's management (Rossing, 2013). So when they make transactions between large companies and smallholding companies (Jost et al., 2014). The transaction between the two companies then occurs what is called transfer pricing of the profits made by small companies and includes the agreed taxation. Finally, transfer pricing transactions are not eliminated, but these transactions will directly affect the allocation of income for tax expenditures where this hotel company is run (Demirhan et al., 2020). So that automatically, the company's transfer pricing policy can directly

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impact income and tax payments from companies to other companies even though they are in different countries (Clausing, 2003).

Furthermore, every transaction and transfer of financial value between related parties of the parent company and its partners must be following the rules in which they operate. This does not only occur in goods transactions, for example, but an item in Indonesia also sells to another company in Indonesia, both of which are owned by a company in Indonesia (Enriques, 2015). However, this is also categorized as a transfer pricing service performed by fellow subsidiaries. Transactions between these companies follow the laws and accounting where they are located, including financing the use of intellectual property that is legally a member of a group of companies or hotels under the supervision of the parent company's offices and hotels (Flaen, 2017).

So this attempt to determine a corporate transfer price requires clarification where value is created in one hotel management association and transferred to all other hotels (Rahimian et al., 2020). This is usually the case; the transfer value can be determined through comparable transactions from one hotel to another, considering assets and risks and the function of group members in transactions between hotel companies (Yasa et al., 2021). Furthermore, the taxpayer's risk must follow the appropriate economic method determined by the country where the hotel industry is located and, of course, by determining a reasonable price range that is mutually beneficial so that the transaction in question not only benefits the company but also has an impact (Eade & Moran, 1996). On taxes for the state, transfer pricing is ultimately used to determine work income and tax expenditures even though they are in different companies far apart (Ferrary, 2015).

Tax regulations already regulate transfer pricing rules; these regulations must have an economic impact on the cost of tax revenue that applies to all countries, which is difficult to achieve (Nur et al., 2021). Recently, many countries have dared to emphasize special disclosures in tax collection, including the transfer pricing mechanism carried out by companies such as the hotel industry, so that there is progress in the visibility of transfer prices with each country (Sheldon & Park, 2011).

The main problem with the simultaneous use of transfer prices lies in obtaining profits based on the law that regulates the right to spend taxes (Wang & Herd, 2013). So it is clear that the government in regulating the taxation system does require higher taxes, so this is significant progress in every economic activity, but of course, there is a mechanism guaranteed by law that allows transfer prices as referred to in the tax rules. All of which are regulated by law (Bauer & Langenmayr, 2013). Indeed, most developed countries already have standard provisions regarding transfer prices so that the principle of tax fairness can be achieved for companies and organizations that they have determined by working together under the authority of inter-country regulations (Schuster, 2015). This objective is an effort to develop transfer pricing procedures for hotel companies operating overseas to have tax guidelines regulated by a measurable mechanism with the provisions used by independent parties in conducting transactions (Drtina & Correa, 2011).

Method

Furthermore, in this section, the paper will describe the journey of the study with the theme of transfer pricing on the benefits and sustainability of the hospitality industry between countries (Ilott et al., 2013). The authors believe that transfer pricing impacts the sustainability and profitability of hotel operations in the respective countries where they operate (Reimann et al., 2014). So to complete this discussion, we have collected several related pieces of kinds of literature from various publications, journals, books, and websites, so that we can use the data in answering this kingdom in the form of a discussion, so first we examine this data by involving the abstract process of coding data intensively. Moreover, concluding getting a clear understanding so that we believe this finding has been able to answer the core problems of this business study (Kustina et al., 2019). We do an electronic search by relying on keywords such as the impact of transfer pricing stability and international hospitality industry, and others. This study entirely relies on published data and epidermal design evidence in this descriptive qualitative study by referring to previous studies, such as reviewing literature reviews (Jingya, 2015). We use some publications, such as Taylor and Francis, Elsevier, Google book, and several domestic scientific publications that discuss the issue of transfer pricing and the sustainability of multinational hotels (Fiala, 2008). In designing the study, we chose a data design to obtain data that can answer our question: What is the phenomenal impact of transfer pricing on the international hotel business (Utama, 2016). So we follow various business qualitative design models. We believe this salary reporting format meets scientific standards and adheres to various models and systems recommended in reporting scientific articles (Chambrone et al., 2010).

Discussion

The impact of transfer pricing in the scope of international corporate tax

We often hear about taking away and or in other words, terms used in property taxation to avoid taxes. The term tax is part of a transaction scheme that occurs to minimize tax expenditures by exploiting a country's weaknesses and tax provisions so that the scheme does not pass taxpayer rules whose provisions are different from tax avoidance or tax evasion tax avoidance (Desta, 2010). This is done, the flow of ways can reduce taxes by violating tax provisions, such as not reporting sales or increasing costs (Bondemark, 2021).

So now, the transaction scheme in the context of transfer pricing to avoid taxes by exploiting the weaknesses of existing tax provisions cannot be justified, according to (Blair-Stanek, 2015). This is something that cannot be justified; the country needs a solution that reduces tax avoidance efforts by companies operating internationally, call it a hotel with this pressing scheme, they can do various ways to limit spending very little with references that they do internationally is an international regime (Hendrix & Haggard, 2015).

In the context of international business, it is clear that international taxation is a function used by governments of various countries formed to respond to business problems at the international level regarding an issue (Heffron & Sheehan, 2020). The force of law is carried out to strengthen the agreement from the party's efforts

who avoid double taxation in the regulation. It states that companies only pay taxes for the country in which they are located. There is implementation, and the international tax regime is unified in a binding model (Purnaya, 2016). Based on the current task in the global realm, two multinational organizations play a role in formulating the International Tax Regime. The first is the Organization for Economic Cooperation and Development (OECD) and the United Nations (UN). The task of these two organizations is to publish a P3B model document that will be used as a reference by various countries in formulating a P3B with other countries (Hashmi & Alam, 2019).

The OECD plays a massive part in move estimating because it has distributed an archive illustrating Article 9 of the OECD Model or the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administration (Chege, 2013). General guidelines in move evaluating plans are expected to keep away from twofold tax assessment, known as the International Tax Transfer Pricing Regime. The presence of this guideline plans to forestall charge mishandle and forestall twofold tax assessment (Avi-Yonah, 2012). Worldwide organizations that complete exchange evaluating plans to keep away from charges, with the International Tax Transfer Pricing Regime, the expense specialists have the power to keep this from occurring. It is unique in case each current assessment authority approaches it unexpectedly. The twofold tax assessment on the benefits of global companies might be conceivable (Tychmanska, 2021). The standards utilized in the International Tax Transfer Pricing Regime are a balance between nations, worldwide lack of bias, and correspondence of citizens from various nations. These three standards become the reference to at last orchestrate the development between nations to complete their particular jobs. Eliminating this guideline can prompt uneven characters between nations (Bodansky et al., 2016).

Transfer pricing schemes have the advantage that multinational companies can only use this role compared to independent companies. Multinational companies have the opportunity to carry out international tax planning (Buckley & Casson, 2010). Therefore, horizontal equality is needed as a fundamental principle in the International Tax Transfer Pricing Regime. It can be concluded that transfer pricing requires a rule of the game to make significant changes in its implementation (Brugger & Engebretsen, 2020), so that every multinational company that carries out transactions can carry out their obligations and get its rights properly. Stigma such as transfer pricing to avoid tax cannot be justified because the implementation is different. With this rule, both tax avoidance and tax avoidance can be avoided. It is essential to understand that taxation issues can be one of the dimensions that can encourage activity within the company. Transfer pricing policies are not immediately suspected of avoiding tax but must be viewed from a more broad context (Davies et al., 2018). Transfer pricing is here to show the contribution of each party in the multinational group of companies with the condition that the transaction is carried out between independent parties. Transfer pricing manipulation can occur due to deviations from the compensation value that should be received by multinational companies but is not given comprehensively (Lyal, 2015).

Therefore, transfer pricing manipulation must be avoided because it can affect the economy of a country. The International Tax Transfer Pricing Regime is expected

to be the first step for multinational companies in various countries to correctly carry out their tax obligations. So that every right and obligation of each taxpayer can be fulfilled following the regulations in their own country (Leite, 2012), this role can be the first step for change to encourage honest behavior in transactions and benefit the various parties involved in the transfer pricing scheme.

Transfer pricing and business restructuring

Indonesia and other emerging nations have been following an ongoing OECD project on how best to agree on how the principles of graciousness would apply to business reconstructing, including cross-obligation movement by worldwide organizations (Emirullah & Hussain, 2014). Such revamping can influence how gains and adversities are divided between the people of the overall affiliation. It additionally influences the organization's yearly evaluation paid in every nation where the gathering works. The OECD Transfer Pricing Principles and Fairness Guidelines can assist with offering replies to a portion of these issues (Mazur, 2016). It is a sudden practice for associations all over the planet to revamp their business exercises. For example, business modifying activities, cross-line trade of assets, risks, and limits, for the most part, have development estimating ideas (Chawla & Wiboonrat, 2013). The Steering Committee of The World Congress in Computer Science, Computer Engineering and Applied Computing. Some ordinary sorts of revamps by and extensive convey restricted danger and board costs and moving assessments. Various kinds of revamping relate to hypothetical asset regionalization, and, taking everything into account, organizations may anticipate moving a portion of their subtle assets between fields (Marquis et al., 2017).

When there is a trade of assets between firms, the impacts of individual spending are to a great extent not felt rapidly in the united monetary assertions (Darvas, 2010). The OECD Model Tax Convention obliges issues moving toward different duty appraisals that should be settled between concerned nations by following the Collective Treaty Procedure, which deals with a steadily developing number of customs requests all over the planet, including complex swapping scale discusses. The current OECD Model Tax Convention joins compulsory and prohibitive optional methodologies for unsettled cases following two years of Collective Agreement Procedures (Aslam & Shah, 2020). Indonesia, as another emerging nation, is very much aware of the hardships presented by step evaluation. Consequently, they have a significant objective like the OECD to get their valuation base and simultaneously do whatever it takes not to impede obscure direct theory and cross-traffic trades. The long arm rule, no question, assists them with accomplishing that objective (Momeni et al., 2014).

Everything needed is to adapt the authoritative measures and organizational efforts to each country's essential needs and assets (Bakan, 2012). Implementing decency standards can be confusing and assets concentrated, although policymakers should remember that most OECD countries start little and expand their exchanges, evaluating laws and practices continuously for more than a long time. Without a doubt, they are still spending time on fixing it. This is an essential condition that Indonesia must implement the step assessment law (Guliye, 2016). Therefore, the law must first target the types of exchanges and areas best known in the economy, such as multiple transaction activities,

assembly, or ordinary asset administration (Moriassi, 2019). Implementation goals should be practical, given the accessible limits and the need for consistency that makes sense to citizens given the size of the cross-line exchange. Given the contentious nature of movement assessments worldwide and here and there, develop universally normalized standards to help countries combat the unreasonable exchange of benefits overseas while simultaneously limiting the dangers of doubling the tax collection of these benefits (Shue, 2014). This is what safe distance guidelines are for. As more and more non-industrialized countries adopt it, new examples will be studied. This is an essential step towards building a more down-to-earth, cleaner, and more enjoyable world economy.

Evaluation of measures is a world issue that has attracted the attention of global associations such as the United Nations Conference on Trade and Development and the Organization for Economic Cooperation and Development (OECD). This issue should ensure that it is likely to be good (Jenkins & Newell, 2013). In other ways, global organizations will exploit it and let profits move from where value is created to lower economic costs. Thus, this training will predict the extraordinary risks to the affected economy (Ehrenberg et al., 2021). Therefore, the movement of profits must be monitored and controlled as most states rely heavily on tax revenues to drive money circulation. Also, for the administration and control of benefit transfer to be successful, worldwide participation is required. Nonetheless, this paper has distinguished exchange rates as one of the significant issues confronting global organizations in today's business world (Porter & Kramer, 2019).

The effect of planned movement estimates and investigations on financial disclosure cuts across many areas, from preparing separate organizational financial statements, procurement accounting, business rebuilding to remittance assessment, was essential (Silverstone & Sheetz, 2011). However, the circumstances and the logical outcome of the assessment moving to pre-task and personal assessment bookkeeping should be carefully considered when the budget summary is being prepared (Everaert & Safari, 2021). The execution of the estimated move is a kind of problem for public authorities and citizens alike. This is somewhat due to the assets' size, which usually combines talented HR and cost consistency. In public authorities, movement evaluation organizations need many assets, and most agricultural countries do not have such assets available to them to have the option to successfully monitor their exchange rate assessment guidelines (Detter & Fölster, 2016).

The world has no questions, being a city worldwide with suggestions for organizations in different geological areas. In the growing business climate worldwide, many global organizations do not consider public channels as a barrier to directing further business; cross-line business practice is on the rise (Henderson et al., 2015). However, the test is that financial experts think it is challenging to keep up with monetary exercises in their region to curb gains related to reviving rapid economic developments. It is strongly recommended that appropriate exchange fees be established for intra-bunch or potentially intra-company exchanges of merchandise, intangibles, and administration (Smith, 2014).

Concentrate on transfer pricing in the hospitality industry

A growing accommodation business climate for the travel industry is needed in any country to help improve the country's finances (Davidson & Sahli, 2015). Therefore, the Indonesian Tourist and Hospitality Association coordinates online courses for individuals to look at the costs of moving and what it means for the travel industry. This is essential for a month-to-month series of online affiliate courses that plan to investigate practical issues in the travel industry. This month we are focusing on evaluating displacement in the travel industry as individuals and some of our organizations are affected by moving costs (Li et al., 2019).

Around the world, movement forecasts generally refer to exchange costs between related encounters. In Indonesia, the displacement estimation rule applies to exchanges made by citizens living in the country with related meetings, including exchanges identified with administration, credit, guarantees (Fechter, 2016). The hospitality and travel industry is a complex undertaking with many sub-fields. Players in this area include lodging, airplanes, transportation organizations, visit managers, trip planners, rental offices, and other providers for business. Indonesia works in a very aggressive market, and it is therefore essential for all areas, not only the travel industry, to create and implement a load hazard investigation approach to evaluate movement and encourage inspection components for the effect of movement estimation on business tasks (Moore et al., 2018).

Measures evaluation rules in Indonesia and around the world can be very confusing and go along with this. They suggest that organizations influence the skills of specialists in forecasting exchanges as they explore this rapidly growing measure. Lyal (2015), states that "additional organizations need to ensure that they have the necessary documentation to provide the country's Tax Administrations to demonstrate that they are aware of related party exchanges and to ensure their annual expense forms. However, under the new exchange estimation rules, only Payers are Mandatory Taxes whose annual gross salaries are approaching or exceeding IDR 500 million currently need to follow the documentation of the transfer fees during their exchange hours to demonstrate reasonable fees (Pendse, 2012).

The continued interest in the travel industry in Indonesia has resulted in the development of viable areas and has firmly influenced financial developments. Carrying out cost measures can be wasteful and sometimes brings significant limits to business and speculation. The emphasis should be set on working on an assessment framework to revive the development of the travel industry by reducing costs for organizations to start and work in this area (Badu et al., 2013). During the one-hour online course, the yakking yak examines the basic fairness standards of the Organization for Economic and Cooperative Development (OECD) measure evaluation rules and explains why step assessments should be taken seriously (Grinenko et al., 2021). He said, "A new study and study recognizes exchange rates as a significant task issue today. In general, state-run administrations implement evaluation rules to ensure fairness in all organizations due to differences in private duty rates in different countries. This administration and the OECD share the view that without important laws, some organizations

may underestimate or misjudge their income and expenditures, so the OECD recommends that a worldwide exchange rate standard be introduced by managing exchanges between related meetings (Zinn & Riedel, 2014).

Conclusion

At the end of this paper, we will present essential points as a summary of the results or findings of the study entitled of transfer pricing on the sustainability and benefits of the hotel industry between countries (Holjevac, 2003). We believe that the description and analysis of the results section, as well as its discussion We believe that this has answered the core problem of this business review study where our explanation is supported by data on the findings of a previous study that we conducted under a phenomenological approach, one way of exploring data as broadly as possible to obtain findings—valid answers to the study questions. Entirely we use the research data to fulfill the request for this study data. We can summarize this study.

Among other things, we mention the impact of transfer pricing in the context of international taxation because we believe that the hotel industry that operates between their countries is immensely affected by the system and regulations of a country in terms of transfer pricing, in other words, all countries will continue to apply binding rules. To get tax entry money from each hotel industry located in their respective countries is essential. The following summary is transfer pricing and how the hotel business is often used. For example, in Indonesia, this transfer pricing model and guideline are regulated in a scheme under the state cooperation organization in development or where each member country understands how the business structure and transfer pricing can be implemented by understanding several countries. Participant. The next thing we describe is how the hospitality and hospitality industry can concentrate on efforts to transfer pricing systems that allow the state to benefit and the hotel companies to benefit so that both can continue to be profitable for the country and profitable for the tourism and hospitality industry. Thus, among others, the conclusions of the data that we present are hoping that all findings supported by study evidence have been as far as possible to answer the core problems of this study. It is hoped that the parties will be interested in contributing to provide meaningful input so that similar studies will be better in the future.

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