

LORRAINE EDEN: CURRICULUM VITAE ¹

I. PERSONAL INFORMATION

- Name: Lorraine Eden (married name: Lorraine Eden Hermann, née: Lorraine Alison Boyd).
- Title: Professor Emerita of Management and Adjunct Professor of Law, Texas A&M University.
- Work Address: Department of Management, Texas A&M University, TAMU 4221, College Station, TX, USA 77843-4221, and School of Law, Texas A&M University, 1515 Commerce Street, Fort Worth, TX, USA 76102. Email: leden@tamu.edu.
- Home Address: 1019 Muirfield Village, College Station, TX, USA 77845-8937. Phone 979.693.1626 (land line); 979.777.3489 (mobile). Email: Lorraine.eden@gmail.com.
- Citizenship: Canada (country of birth) and United States (naturalized citizen 2008).
- Identifiers
 - Google Scholar: <https://scholar.google.com/citations?user=7tggJU8AAAJ&hl=en>
 - LinkedIn: <https://www.linkedin.com/in/lorraine-eden>
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 - Personal Website: <https://www.voxprof.com>
 - SSRN: https://papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=398344
 - Texas A&M University: <https://mays.tamu.edu/directory/lorraine-eden/>

II. DEGREES RECEIVED

- Dalhousie University, Halifax, NS, Canada: PhD with Distinction in Economics, 1976. Dissertation: The Importance of Transfer Pricing: A Microeconomic Analysis of Multinational Behaviour under Trade Barriers (Supervisor: Dr. Carl Sumner Shoup).
- McGill University, Montreal, PQ, Canada: MA in Economics, 1973.
- Mount Allison University, Sackville, NB, Canada: BA with First Class Honors in Economics, 1970.

III. EMPLOYMENT HISTORY

Fulltime Positions

- Texas A&M University, Department of Management, Mays Business School, College Station, TX, USA, July 1995-present. Professor emerita 2019-present, full professor 2002-2019, associate professor 1995-2002, faculty development/sabbatical leaves Sept-Dec 2004 and 2013-2014.
- Carleton University, Norman Paterson School of International Affairs, Ottawa, ON, Canada, Jan 1988-June 1995. Full professor 1992-1995, associate professor 1988-1992.
- Brock University, Department of Economics, St. Catherine's, ON, Canada, July 1980-Dec 1987. Associate professor 1981-1987, assistant professor 1980-1981.

¹This shortened CV focuses on my most recent and relevant achievements and experiences.

- Mount St. Vincent University, Department of Economics, Halifax, NS, Canada, 1971-1980. Assistant professor and dept chair 1976-1980; unpaid leave (PhD studies) 1974-1976, lecturer 1971-1974.

Part-time Positions, Texas A&M University

- School of Law, 2019-present. Adjunct professor 2020-present, research professor (joint appointment with Mays Business School) 2019-2023.
- The Bush School of Government and Public Service, Associated faculty 1995-2019.

Part-time Visiting Positions

- The Ohio State University, Dept of Management, Columbus, OH, 2013-2014.
- University of Reading, Henley Business School, Reading, UK, Dunning Visiting Professorship, 2011.
- University of Texas, Dept of Management, Austin, TX, 2004-2005.
- The Ohio State University, Dept of Finance, July-August 1993.
- Harvard University, Kennedy School of Government, Cambridge, MA, Pew Faculty Fellow 1991-1992; US-Canada Fulbright Scholar and Visiting Full Professor, 1992-1993.
- Dalhousie University, Center for International Business Studies, Halifax, NS, Canada. Visiting Research Fellow July-August 1984.

Consulting Experience

- Analysis Group: Economic Consulting and Strategy. <https://www.analysisgroup.com>. Expert witness and consulting on transfer pricing controversy, 2009 to present.

IV. AWARDS, HONOURS AND DISTINCTIONS

Awards

- International Federation of Scholarly Associations of Management (IFSAM) Award for Excellence in Societally Relevant Management Scholarship, 2020 (awarded in 2023).
- Outstanding Service to the Global Community Award, International Management Division, Academy of Management, 2022.
- Responsible Research in Business and Management (RRBM) Award, 2021. For: Eden and Wagstaff. 2021. Evidence-based policymaking and the wicked problem of SDG 5 gender equality, *Journal of International Business Policy*, 4.1: 28-57.
- Gold Medals for Scholarship and for Scholarly Service, *Journal of International Business Studies*, for substantive and exceptional contributions during the journal's first 50 years, 2019.
- Emerald Literati Lookback Award, 2020. For: Eden and Forquer Gupta. 2017. Culture and Context Matter: Gender in International Business and Management, *Cross Cultural and Strategic Management*, 24.2: 194-210 (Highly Commended Paper, 2018).

- John H. Dunning President's Award, Academy of International Business (AIB) for outstanding service to AIB and the field of international business, 2012.

Honours

- Medal of the City from the Mayor of the City of Rennes for scholarly contributions to international business. Presented at the City Hall, Rennes, France on June 6, 2019.
- Tribute Scholar honored by the European International Business Academy (EIBA) for scholarly contributions to international business research, 2019.
- Inaugural recipient, Woman of the Year Award, Women in the Academy of International Business, 2016.
- Inaugural recipient, John H. Dunning Visiting Professorship, University of Reading, Reading, UK, 2011.
- Inaugural recipient, Bush Excellence in International Research Faculty Award, given by the Bush Presidential Library Foundation in recognition of Texas A&M faculty who make outstanding contributions to international research, 2002.
- Inaugural recipient, Trans-Texas Video Teleconferencing (TTVN) Prize for Most Innovative Use of the TTVN Network, Texas A&M University System, 1997.
- Who's Who in America - 2006, 60th Diamond Edition, Marquis 2005.
- Who's Who in International Business Education and Research, 1999.

Distinctions

- Subcommittee on Transfer Pricing, United Nations Committee of Experts on International Cooperation in Tax Matters (UN Tax Committee), 2022-2025.
- Steering Committee, International Forum on Transfer Pricing Law, 2021-2025.
- Research Fellow, Amsterdam Centre for Transfer Pricing and Income Allocation, University of Amsterdam, 2022-2025.
- Dean of Fellows, Academy of International Business (AIB), 2020-2023; elected AIB Fellow, 2004.
- Editor-in-Chief, Journal of International Business Studies 2008-2010.
- Consulting Editor Boards of Journals: (1) *World Tax Journal* (International Bureau of Fiscal Documentation) 2023-2026. (2) *Journal of International Business Studies* 2013-present. (3) *Journal of International Business Policy* 2017-present. (4) *Journal of Industrial and Business Economics* 2024-present. (5) *Transnational Corporations* (UNCTAD) 2018-2024. (6) *Cross-Cultural and Strategic*

Management Journal 2015-2019.

- Executive Boards of Academic Associations: (1) Executive Board, Academy of International Business (AIB): President-Elect 2016-2017, President 2017-2018, Past President 2018-2019; Vice President Programs, 2000-2002. (2) Executive Board, International Studies Association, International Political Economy (IPE) Section 1992-1997 (Vice President 1992-1994, Program Chair 1994-95, President 1994-1996, Past President 1996-97). (3) Board of Directors, International Trade and Finance Association 1996-98. (4) Executive Board and Vice-President, Canadian Economics Association, 1990-1991. (5) Executive Committee, Centre for Trade Policy and Law, Carleton University, Ottawa, ON, Canada, 1989-1995.
- International Scientific Committee, Rennes School of Business, Rennes, France, 2018-2022.
- Rotary International Paul Harris Fellow, 2006.
- Chair, Ad Hoc Committee on International Diversity, Academy of Management 2002-2004.
- Founder and first President, Women in the Academy of International Business (WAIB), 2001-2003.
- Research Associate, International Motor Vehicle Project, Massachusetts Institute of Technology, 1995-1999.
- Associate Director, Center for the Study of Western Hemispheric Trade, Texas A&M University, 1995-97.
- Canada-US Fulbright Research Scholar Award, Kennedy School of Government, Harvard University and the Department of Finance, Ohio State University, 1992-1993.
- Pew Faculty Fellowship, Kennedy School of Government, Harvard University, 1991-1992.
- Founder and first President, Canadian Women Economists Network (CWEN) 1990-1992. (CWEN now a standing committee of the Canadian Economic Association).

V. MAJOR GRANTS

Research Grants (Principal or Co-Principal Investigator)

- PI: Texas A&M University Faculty Fellowship (university-wide, 12 selected), 2002-2007, \$US 100,000.
- Co-PI with M.A. Molot, Massachusetts Institute of Technology International Motor Vehicle Program Research Grant, Impact of Free Trade and Lean Production on the Canadian and Mexican Auto Parts Industries, 1997-2000, \$US 12,950.
- PI: Texas A&M Center for the Study of Western Hemispheric Trade. Responses to NAFTA and Lean Production: A Survey of Canadian and Mexican Automotive Suppliers. 1996-1998, \$US 13,950.

- PI: Investment Canada. MNEs in North America: After NAFTA. 1993, \$CA 12,000.
- PI: Ontario Fair Tax Commission. Taxes, Transfer Pricing and Free Trade: Implications for Ontario Tax Policy. 1992-1993, \$CA 15,000.
- Co-PI with M.A. Molot: Social Sciences and Humanities Research Council of Canada (SSHRCC) Strategic Grants on Managing for Global Competitiveness. Managing the North American Relationship: Lessons from the Auto Industry, 1991-1996, \$CA 95,750.
- PI: Canada-US Fulbright Research Award, 1992-1993, "The North American Auto Industry under Free Trade", \$US 25,000.
- PI: Social Sciences and Humanities Research Council (SSHRCC), Designing an Optimal Provincial-Local Equalization Grant, 1987-1989, \$CA 19,750.
- Co-PI with Douglas Auld: Social Sciences and Humanities Research Council of Canada. Provincial-Local Equalization Programs in Canada, 1984-86, \$CA 10,000.

Conference/Institutional Grants

- Co-PI with Michael Pustay. US Department of Education Center for International Business Education (CIBER) Grant, Center for International Business Studies, Texas A&M University. \$US 1,129,600 over four years 2014-2018.
- PI: Conference on Multinationals, Growth and Governance, held at the Rotman School of Management, University of Toronto, April 2004, in honor of A. Edward Safarian. Funding from Industry Canada and the Department of Foreign Affairs and International Trade (DFAIT): \$CA 35,000.
- Co-PI with Peter Rose. US Department of Education Center for International Business Education (CIBER) Grant, Center for International Business Studies, Texas A&M University. \$US 990,000 over three years 1999-2002.
- PI: Conference on "Multinationals in North America". Held at Carleton University and Industry Canada. May 1993. Funding by Investment Canada. \$CA 157,000.
- PI: Conference on Retrospectives on Public Finance in honor of Carl Sumner Shoup. Held at Carleton University. Funding by Social Sciences and Humanities Research Council of Canada, the Japan Foundation and Carleton University, 1989: \$19,000.

VI. SCHOLARLY PUBLICATIONS

Research Rankings

- *World's Top 2 Percent of Scientists, Stanford University, 2020-2024.* 2024 stats: top 1.4% of 4.46 million scientists (all fields); top 1.2% of 57,191 (business and management).

<https://topresearcherslist.com/Home/Profile/787058>. <https://top2percentscientists.com/stanford-elsevier-top-scientists-list-2024/>

- *AD Scientific Index for World Scientist and University Rankings, 2022-2025*. Top 2% of Scientists Worldwide in Business and Management. <https://www.adscientificindex.com/scientist/lorraine-eden/4974310>. https://www.adscientificindex.com/top-100-scientist/?con=&tit=&country_code=&q=LORRAINE+EDEN+
- Ranked 4th most productive scholar worldwide among Management faculty and 13th most productive scholar among Business School faculty 2000-2015 in terms of number of articles in 24 “journals of distinction” (category 4* journals in the CABS Academic Guide 2015) in Korkeamäki, Timo P., Sihvonen, Jukka and Vähämaa, Sami. 2018. Evaluating Publications Across Business Disciplines: Inferring Interdisciplinary 'Exchange Rates' from Intradisciplinary Author Rankings. *Journal of Business Research*, 84.1: 220-232 (pp. 223, 227).
- Identified as the most prolific scholar in terms of number of publications in the top 45 high-impact business journals in 2010_(based on SSCI Journal Citation Reports) in J. Linton. 2012. Business school research and rankings: Where do the schools really stand? *Technovation*, 32 (January): 1-5.

Publication Statistics

Googe Scholar Metrics (as of 19 November 2024)	ALL	SINCE 2019
Number of Citations	23,590	10,217
H-index	51	40
i10-index	115	78

Scholarly Publications by Type	Number
Books	10
Guest editor for special issues of journals	6
Journal articles	107
Chapters in books	59
Editor-in-Chief editorials	23
Technical reports and monographs	10
Articles in best paper and conference proceedings	10
Total	224

Other Publications by Type (not included in this CV)	Number
Book reviews in scholarly journals	10
Publications in university working paper series	8
Articles in professional association publications	11
Unpublished technical reports	7
Scholarly research for degree programs	3
Total	39

Books

- Eden, Lorraine, Bo Bernhard Nielsen and Alain Verbeke (editors). 2020. *Research Methods in International Business*. JIBS Special Collections series, Palgrave Macmillan.
- Eden, Lorraine (editor). 2019. *The Economics of Transfer Pricing: The International Library of Critical Writings in Economics*. Cheltenham, UK: Edward Elgar Publishing.
- Eden, Lorraine, Kathy Lund Dean and Paul Vaaler. May 2018. *The Ethical Professor: A Practical Guide to Research, Teaching and Professional Life*. Abington, UK: Routledge, Taylor and Francis Group. Also published in Chinese by Peking University Press, 2022.
- Eden, Lorraine (editor). 2009. *The JIBS Decade Awards: 1970-1986*. Commemorative volume of winning articles of the JIBS 40th Anniversary Decade Awards. London: Palgrave Macmillan.
- Eden, Lorraine and Wendy Dobson (editors). 2005. *Governance, Multinationals and Growth*. Cheltenham, UK: Edward Elgar Publishing.
- Eden, Lorraine. 1998. *Taxing Multinationals: Transfer Pricing and Corporate Income Taxation in North America*. Toronto: University of Toronto Press.
- Eden, Lorraine (editor). 1994. *Multinationals in North America*. Industry Canada Research Series Volume Three. Calgary: University of Calgary Press. Also published in French. Reprinted in 1996.
- Eden, Lorraine and Evan Potter (editors). 1993. *Multinationals in the Global Political Economy*. London: Macmillan, New York: St. Martin's Press, and Toronto: McClelland and Stewart.
- Eden, Lorraine (editor). 1991. *Retrospectives on Public Finance*. Fiscal Reform in the Developing World Series. Durham, NC: Duke University Press.
- Rugman, Alan M. and Lorraine Eden (editors). 1985. *Multinationals and Transfer Pricing*. London: Croom Helm and New York: St. Martin's Press. Reprinted in 2017 by Routledge.

Guest Editor for Special Issues of Journals

- Gupta, Susan Forquer, Lorraine Eden, Amanda Bullough, Fiona Moore and Tugba Kalafatoglu (guest editors). 2017. "Gender in International Business and Management." *Cross-Cultural and Strategic Management*, 24.2.
- Eden, Lorraine (guest editor). 2009. "The JIBS 40/AIB50 Anniversary Issue: Innovations in International Business Theory." *Journal of International Business Studies*, 40.9.
- Eden, Lorraine, Amy Hillman, Peter Rodriguez and Donald Siegel (guest editors). 2006. "Three Lenses on the Multinational Enterprise: Politics, Corruption and Corporate Social Responsibility." *Journal of International Business Studies*, 37.6.
- Eden, Lorraine and Stefanie Lenway (guest editors). 2001. "Multinationals: The Janus Face of

Globalization.” *Journal of International Business Studies*, 32.3.

- Hoskisson, Robert, Lorraine Eden, Chung-Ming Lau and Michael Wright (guest editors). 2000. “Strategies in Emerging Markets.” *Academy of Management Journal*, 43.3.
- Eden, Lorraine (guest editor). 1991. “Sovereignty at Bay: An Agenda for the 1990s.” *Millennium: Journal of International Affairs*, 20.2.

Journal Articles

- Eden, Lorraine. 2024. Exit, Pursued by a Bear! Global Shocks and MNE Responses. *Journal of International Business Studies*, Oct. doi.org/10.1057/s41267-024-00741-3.
- Eden, Lorraine. 2024. Virtuous Circles in the Academy: Insights from AIB’s Ethical Organizational Culture. *Journal of International Business Policy*, Sept. doi.org/10.1057/s42214-024-00198-z.
- Liu, Chang, Lorraine Eden and Dan Li. 2024. Violent Conflict and Multinational Enterprises: Identifying Key Frontiers in International Business Policy Research. *Journal of International Business Policy*, 7.3 (Sept): 260-275.
- Miller, Stewart R, Fiona Moore and Lorraine Eden. 2024. Ethics and International Business Research: Considerations and Best Practices. *International Business Review*, 33.1: 102207.
- Polman, Paul and Lorraine Eden. 2023. Imagine a Better World: An Interview with Paul Polman, AIB 2023 International Executive of the Year. *AIB Insights*, 23.5 (Nov). doi.org/10.46697/001c.90323.
- Hervé, Yves and Lorraine Eden. 2023. Shapley Value in Dispute Resolution: Lessons in Transfer Pricing from a Life Sciences MNE. *Tax Notes International*, 112 (Nov 6): 755-770.
- Eden, Lorraine. 2023. Pillar 1 Amount B: Simplifying the Arm’s-Length Principle for Baseline Distribution Activities. *Tax Notes International*, 112 (Oct 9): 179-190.
- Doh, Jonathan, Lorraine Eden, Ann Tsui and Srilata Zaheer. 2023. Developing International Business Scholarship for Global Societal Impact. *Journal of International Business Studies*, 54: 757-767.
- Wilkie, Scott and Lorraine Eden. 2022. Public Finance in the Real World: Through the Lens (Down the Rabbit Hole?) of Transfer Pricing. *Canadian Tax Journal*, Vol. 70, Supplement, 257-290.
- Eden, Lorraine and L. Murphy Smith. 2022. The Ethics of Transfer Pricing: Insights from the Fraud Triangle. *Journal of Forensic and Investigative Accounting*, 14.3: 361-383.
- Dai, Li, Lorraine Eden and Paul W. Beamish. 2023. The Timing and Mode of Foreign Exit from War Zones. *Journal of International Business Studies*, 54.6: 2090-1104.
- Eden, Lorraine. 2022. The (Not So) Simple Analytics of the New Amount A. *Tax Notes International*, 107 (September 26): 16-30.

- Lui, Chang (Cathy), Dan Li, Lorraine Eden and Marjorie A. Lyles. 2022. Danger from a Distance: The Role of Executives' Social Distance in Multinationals' Divestment Responses to Host Country Terrorist Attacks. *Strategic Management Journal*, 43.11: 2414-2443.
- Eden, Lorraine, Stewart R. Miller, Sarfraz Khan, Robert Weiner, and Dan Li. 2022. The Event Study in International Business Research: Opportunities, Challenges, and Practical Solutions. *Journal of International Business Studies*, 53: 803-817.
- Eden, Lorraine, Charles F. Hermann and Stewart R. Miller. 2021. Evidence-based Policymaking in a VUCA World. *Transnational Corporations*, 28.3: 159-182.
- Hahn, Verena, Yves Hervé, Salem Saljanin, and Lorraine Eden. 2021. Shapley Value: A Fair Solution to the Value Creation Puzzle in Transfer Pricing? *Tax Notes International*, 104.4 (Oct 18): 291-306.
- Eden, Lorraine. 2021. Taxing the Top 100: US Estimates of Winners and Losers from Pillar One Amount A. *Tax Management International Journal*, 50.6 (June): 301-317.
- Eden, Lorraine. 2021. Winners and Losers: US Country and Industry Estimates of Pillar One Amount A. *Tax Management International Journal*, 50.5 (May): 222-243.
- Srinivasan, Niraja and Lorraine Eden. 2021. Going Digitals: Navigating Economic and Social Imperatives in a Post-Pandemic World. *Journal of International Business Policy*, 4: 228-243.
- Eden, Lorraine. 2021. The Simple Analytics of Pillar One Amount A. *Tax Management International Journal*, 50.3 (March): 137-143.
- Eden, Lorraine. 2021. Canada and the United States: Winners or Losers from Pillar One Amount A? *Tax Management International Journal*, 50.3 (March): 143-147.
- Eden, Lorraine, Daniel C. Indro, Stewart R. Miller, and Malika Richards. 2021. Valuation Uncertainty, Home and Host Market Uncertainty, and Cross-Border Seasoned Equity Offerings. *International Business Review*, 30(3), June.
- Eden, Lorraine and M. Fernanda Wagstaff. 2021. Evidence-Based Policymaking and the Wicked Problem of SDG 5 Gender Equality. *Journal of International Business Policy*, 4: 28-57. Winner: Responsible Research in Management Award, 2021, Academy of Management Fellows and Responsible Research in Business and Management (RRBM). Included in PRME (Principles for Responsible Management Education), Top 10 List on Gender Equality, 2022.
- Higinbotham, Harlow, Niraja Srinivasan, Vladimir Starkov, Nihan Mert-Beydilli, and Lorraine Eden. 2021. Amount B: Facts and Circumstances Matter – Even for Routine Distributors. *Tax Management International Journal*, 50.2 (February): 90-97.
- Colliard, Jean-Edouard, Lorraine Eden, and Co-Pierre Georg. 2021. Tax Complexity and Transfer Pricing: Blueprints, Guidelines, and Manuals. *Tax Management International Journal*, 50.2: 76-89.
- Eden, Lorraine. 2020. Pillar One Tax Games. *Tax Management International Journal*, 50 (Dec 31).

- Eden, Lorraine. 2020. Winners and Losers: The OECD's Economic Impact Assessment of Pillar One. *Tax Management International Journal*, 49 (December 11).
- Eden, Lorraine. 2020. Leap of Faith: The Economic Impact Assessment of the Pillar One and Pillar Two Blueprints. *Tax Management International Journal*, 49 (December 11).
- Eden, Lorraine. 2020. Wither WIR (Redux)? *Academy of International Business (AIB) Insights*. Dec.
- Eden, Lorraine and Bo Bernhard Nielsen. 2020. Research Methods in International Business: The Challenge of Complexity. *Journal of International Business Studies*, 51(9): 1609-1620.
- Eden, Lorraine. 2020. David and the Three Goliaths: Defending the Arm's Length Principle. *Bloomberg Tax Transfer Pricing Report* (Sept. 14), *Tax Management International Journal* (Oct. 2).
- Miller, Stewart R., Lorraine Eden and Dan Li. 2020. CSR Reputation and Firm Performance: A Dynamic Approach. *Journal of Business Ethics*, 163 (3): 619-636.
- Eden, Lorraine. 2020. Taxing Multinationals – The GloBE Proposal for a Global Minimum Tax. *Tax Management International Journal*, January.
- Eden, Lorraine and Oliver Treidler. 2019. Taxing the Digital Economy: Pillar One Is Not BEPS 2. *Tax Management International Journal* (December 13): 603-615.
- Eden, Lorraine. 2019. The Arm's Length Standard Is Not the Problem. *Tax Management International Journal*. Also published in *Bloomberg Tax Daily Tax Report*. Published in Spanish in *IDC Asesor Fiscal, Jurídico y Laboral (IDC)*, November 2019.
- Eden, Lorraine, Niraja Srinivasan and Srini Lalapet. 2019. Transfer Pricing Challenges in the Digital Economy: Hic Sunt Dracones? *Tax Management International Journal*, June 14.
- Srinivasan, Niraja, Srini Lalapet and Lorraine Eden. 2019. Transfer Pricing Challenges in the Digital Economy: A Case Study of the Internet of Things. *Tax Management International Journal*, June 14.
- Eden, Lorraine and William Byrnes. 2018. Transfer Pricing and State Aid: The Unintended Consequences of Advance Pricing Agreements. *Transnational Corporations, Special Issue on Investment and International Taxation, Part 1*, 25(2): 9-36.
- Li, Dan, Lorraine Eden and Matt Josefy. 2017. Agent and Task Complexity in Multilateral Alliances: The Safeguarding Role of Equity Governance. *Journal of International Management*, 28.3: 227-241.
- Eden, Lorraine and Susan Forquer Gupta. 2017. Culture and Context Matter: Gender in International Business and Management. *Cross Cultural and Strategic Management*, 24.2:194-210. Winner: 2020 Emerald Literati Lookback Award and Highly Commended Paper, 2018.
- Dai, Li, Lorraine Eden and Paul w. Beamish. 2017. Caught in the Crossfire: Dimensions of Vulnerability and Foreign Multinationals' Exit from War-Afflicted Countries. *Strategic Management*

Journal, 38(7): 1478-1498.

- He, Xiaoming, Lorraine Eden and Michael Hitt. 2016. Shared Governance: Institutional Investors as a Counterbalance to the State in State Owned Multinationals. *Journal of International Management*, 22: 115-130.
- He, Xiaoming, Subrata Chakrabarty and Lorraine Eden. 2016. The Global Emergence of Chinese Multinationals: A Resource Based View of Ownership and Performance. *Asian Business & Management*, 15(1): 1-31.
- He, Xiaoming, Lorraine Eden and Michael Hitt. 2016. The Renaissance of State Owned Multinationals. *Thunderbird International Business Review*, 58.2 (March/April): 117-129.
- Dai, Li, Lorraine Eden and Paul Beamish. 2013. Place, Space and Geographic Exposure: Foreign subsidiary survival in conflict zones. *Journal of International Business Studies*, 44.6 (Aug): 554-578. Reprinted in 2022 in Murad Mithani, Rajneesh Narula, Irina Surdu, and Alain Verbeke (editors). *Crises and Disruptions in International Business*. Palgrave Macmillan, 123-175.
- Li, Dan, Lorraine Eden, Michael Hitt and R. Duane Ireland. 2012. Governance in Multilateral R&D Alliances. *Organization Science*, 23.4 (July-August): 1191-1210.
- Li, Dan, Stewart R. Miller, Lorraine Eden and Michael A. Hitt. 2012. The Impact of Rule of Law on Value Creation for Local Alliance Partners in BRIC Countries. *Journal of International Management*, 18: 305-321.
- Zhu, Hong, Lorraine Eden, Stewart R. Miller, Douglas E. Thomas and Paige Fields. 2012. Host-country location decisions of early movers and latecomers: The role of local density and experiential learning. *International Business Review*, 21: 145-155.
- Campbell, Joanna Tochman, Lorraine Eden and Stewart R. Miller. 2012. Multinationals and Corporate Social Responsibility in Host Countries: Does Distance Matter? *Journal of International Business Studies*, 43: 84-106.
- Eden, Lorraine. 2011. Launching a career in transfer pricing. *Transfer Pricing International Journal*, October: 26-30.
- Chang, Sea-Jin, Arjen van Witteloostuijn and Lorraine Eden. 2010. Common method variance in international business research. *Journal of International Business Studies*, 41.3: 178-184. Reprinted in 2020 in Eden, Lorraine, Bo Bernhard Nielsen and Alain Verbeke, editors, *Research Methods in International Business*. Palgrave Macmillan.
- Lee, Seung-Hyun, Kyeungrae Oh and Lorraine Eden. 2010. Why do firms bribe? Insights from residual control theory into firms' vulnerability and exposure to corruption. *Management International Review*, 50: 775-796.
- Eden, Lorraine. 2010. Adding Spice to Our Scholarly Journals: The JIBS Experience. *International Studies Quarterly*, 54: 901-07.

- Eden, Lorraine and Li Dai. 2010. Rethinking the O in Dunning's OLI/Eclectic Paradigm. *Multinational Business Review*, 18.1: 13-34.
- Eden, Lorraine, Li Dai and Dan Li. 2010. International Business, International Management, International Strategy: What's in a Name? *International Studies of Management & Organization*, 40(4): 54-68. Reprinted in *The Routledge Companion to International Management Education*, Denise Tsang, Hamid H. Kazeroony and Guy Ellis (eds.), 2013, 33-61, Routledge.
- Eden, Lorraine. 2009. Perspectives on international business: Insights from the 1970–1985 JIBS Decade Award Winners. *Journal of International Business Studies*, 40.9: 1581-1590.
- Li, Dan, Lorraine Eden, Michael Hitt and Duane Ireland. 2008. Friends, Acquaintances or Strangers? Partner Selection in R&D Alliances. *Academy of Management Journal*, 51.2 (April): 315-334.
- Miller, Stewart, Douglas Thomas, Lorraine Eden and Michael Hitt. 2008. Knee Deep in the Big Muddy: The Survival of Emerging Market Firms in Developed Markets. *Management International Review*, 48.6: 645-666.
- Perez Batres, Luis and Lorraine Eden. 2008. Is There a Liability of Localness? How Emerging Market Firms Respond to Regulatory Punctuations. *Journal of International Management*, 14.3: 232-251.
- Miller, Stewart, Dan Li, Lorraine Eden and Michael Hitt. 2008. Insider Trading and the Valuation of International Strategic Alliances in Emerging Stock Markets. *Journal of International Business Studies*, 39.1: 102-117.
- Thomas, Douglas, Lorraine Eden, Michael Hitt and Stewart Miller. 2007. Experience of Emerging Market Firms: The Role of Cognitive Bias in Developed Market Entry and Survival. *Management International Review* 47.6: 1-23.
- Eden, Lorraine 2007. Multinationals, Foreign Direct Investment and the New Regionalism in the Americas. *Integration & Trade Journal*, 26 (June): 97-124.
- Uhlenbruck, Klaus, Peter Rodriguez, Jonathan Doh and Lorraine Eden. 2006. The Impact of Corruption on Entry Strategy: Evidence from Telecommunication Projects in Emerging Economies. *Organization Science*, 17.3 (May-June): 402-414.
- Rodriguez, Peter, Don Siegel, Amy Hillman and Lorraine Eden. 2006. Three Lenses on the MNE: Politics, Corruption and Corporate Social Responsibility. *Journal of International Business Studies* 37, 733–746.
- Miller, Stewart and Lorraine Eden. 2006. Local Density and Foreign Subsidiary Performance. *Academy of Management Journal*, 49.2: 341-355.
- Eden, Lorraine. 2005. Went for Cost, Priced at Cost? An Economic Approach to the Transfer Pricing of Offshored Business Services. *Transnational Corporations*, August 2005. Reprinted in 2006 in *Tax Management Transfer Pricing Report*, Special Report, February 2006.

- Rodriguez, Peter, Klaus Uhlenbruck and Lorraine Eden. 2005. Government Corruption and the Entry Strategies of Multinationals. *Academy of Management Review*, 30.2: 383-396.
- Eden, Lorraine, Luis Juárez Valdez and Dan Li. 2005. Walk Softly and Carry a Big Stick: Transfer Pricing Penalties and the Market Valuation of Japanese Multinationals in the United States. *Journal of International Business Studies*. 36: 398-414.
- Eden, Lorraine and Robert Kudrle. 2005. Tax Havens: Renegade States in the International Tax Regime. *Law and Policy*, 27.1 (January): 100-127.
- Thomas, Douglas and Eden, Lorraine. 2004. What Is the Shape of the Multinationality-Performance Relationship? *Multinational Business Review*. 6(2): 63-70. Most highly cited publication in *Multinational Business Review (1993-2020)*.
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VIII. KEYNOTE SPEECHES AND INVITED PRESENTATIONS

- “Taxing Multinationals: *Hic Sunt Dracones* (Turbulent Times Ahead)!” Texas A&M International University, Laredo, TX. October 16, 2024.
- “Pillar One Amount A: Where Then? Where Now? Where Next?” Virtual presentation. Transfer Pricing Conference, Universidad Pan Americana and QCG Transfer Pricing Practice, March 8, 2024.
- Fireside Chat with Rezan Okten and Hans van Egdome on “*Corporate Social Responsibility and Ethics in Transfer Pricing*”, Center for Transfer Pricing and Income Allocation, University of Amsterdam, Amsterdam, The Netherlands, April 21, 2023.
- “Tax Me If You Can: The Ethics of Tax Avoidance”, Science and Society Meetings – XXXVIII”. Keynote (virtual) at Istanbul Ticaret University, March 20, 2023.
- “The Global Minimum Tax: A Bridge between Worldwide and Territorial Tax Regimes?” Online webinar for KONDOR GLOBAL, November 28, 2022.
- “Multinationals and Tax Avoidance”, (virtual) Leipzig Colloquium, September 28, 2023.
- “Pillars One and Two: A Report Card.” Transfer Pricing Minds Americas, Miami, April 19, 2022.
- “Transfer Pricing Realignment in the Digital Economy”. American-Hellenic Chamber of Commerce Annual (AmChamGR) Annual Tax Forum, Nov 15-16, 2021.
- “Taxing the Digital Economy”, Fourth Annual Transfer Pricing and International Tax Conference, Pan-American University, Mexico City, MX (virtual). Nov 12, 2021.
- “Amount A: Measurement and Tax Impacts”, KONDOR Global Webinar, Oct. 28, 2021.
- “Amount A: Measurement and Tax Impacts”, Keynote speaker, American Bar Association six-part online seminar series on “The Realignment of Taxing Rights in the Digital Economy”, Oct. 19, 2021.
- “David and the Three Goliaths: Defending the Arm’s Length Principle.” Third Annual Transfer Pricing Conference, Panamerican University, Mexico City, MX (virtual). August 14, 2020.
- “The Arm’s Length Standard – Happy 85th Anniversary?” Transfer Pricing Minds Americas. Miami.

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- “The Arm’s Length Standard Is Not the Problem”. CrossBorder Solutions Transfer Pricing Summit, Scottsdale AZ, December 7, 2019.
- “The times they are a’changing - again: Can we learn anything from the past?” Keynote after receiving the Medal of the City from the Mayor of the City of Rennes, International Scientific Committee, Rennes School of Business, Rennes CEDEX – France. June 6, 2019.
- “Transfer Pricing and Global Strategy: Moving from Pricing Transactions to the C-Suite”. Rotman Institute for International Business Discussion Series on Current Events in International Business, Rotman School of Management, University of Toronto, Toronto, Canada. February 12, 2019.
- OIKOS Future Lab, Geneva, CH. Oct 2018. (OIKOS is an international, student-led, non-profit organization promoting sustainability in economics and management.)
- Foro de Precios de Transferencia, Federacion de Economistas (Federation of Business Economists, Transfer Pricing Forum), Mexico City, MX, Sept, 2018.
- Academy of International Business, Southeast Chapter meetings, Washington, DC, Oct 28, 2017.
- International Business Research Conference, HEC Montreal, Montreal, PQ, Canada, April 17, 2014.

IX. TEACHING EXPERIENCE

School of Law, Texas A&M University, 2020 to present

- Adjunct Professor, Law 625 and Law 626 International Transfer Pricing, Parts I and II. Lead Instructor: Prof. William Byrnes, 2020-2025 (six lectures, virtual).

Department of Management, Mays Business School, Texas A&M University, 1995-2019

- MGMT 663: International Transfer Pricing (masters, PhD), 2007-2019. Course approved as preparation for the Advanced Diploma in International Taxation (ADIT), Chartered Institute of Taxation (COIT). Cross-listed in the Bush School and Economics Department.
- MGMT 667: Multinational Enterprises (masters, PhD): 1997-2019. Cross-listed in the Bush School.
- MGMT 665: Regional Integration in the Americas (masters): 1998, 1999. Taught jointly via TTVN with Dr. Maureen Molot, Carleton University, Ottawa and Dr. Isabel Studer, Instituto Tecnológico Autonomo de Mexico (ITAM), Mexico City, MX. Cross-listed in the Bush School.
- MGMT 450: International Environment of Business (undergraduate), most years.

Executive Training, Mays Business School, Texas A&M University, 2008-2013

- Global Business Strategy, BLD III Program for Halliburton executives, Center for Executive Development, Mays Business School, 4 and 8 hour modules, 2008-2013.

Prior Teaching Experience, 1971-1995

- Carleton University, The Norman Paterson School of International Affairs, 1988-1995: International Political Economy, Multinational Enterprises, International Economics (masters).
- Brock University, Department of Economics, 1980-1987: Introductory Economics, Microeconomics, International Economics, Public Finance, Multinational Enterprises (undergraduate).
- Mount St. Vincent University, Department of Economics, 1971-1980: Introductory Economics, Microeconomics, Public Finance, International Economics, Canadian Economic Problems and Policies (undergraduate).

Graduate Supervisions of PhD Dissertations

- **Texas A&M University - Dissertation Chair (6):** Dong Wook Huh (MGMT, 2014); Li Dai (MGMT, 2011); Xiaoming He (MGMT, 2010); Luis Perez Batres (MGMT, 2006); Dan Li (MGMT, 2005); Douglas E. Thomas (MGMT, 2001)
- **Texas A&M University - Dissertation Committee Member (14):** Wendy Wang (Political Science, 2015); Ying Zhu (MKTG, 2011); Kelli Phelan (ED ADMIN & HRD, 2010); Jie Kie (ED ADMIN & HRD, 2010); Kehan Xu (MGMT, 2010); Hong Zhu (MGMT, 2008); Bill Worthington (MGMT, 2007); Bruce Runyan (ACCT, 2006); Wesley Welch (AG ECON, 2003); Tieying Yu (MGMT, 2003); Shirley Hunter (ACCT, 2003); Pranjal Gupta (MKTG, 2002); Luis Juarez Valdez (ACCT, 1999); Aleta Best (MGMT, 1997).
- **Other Universities – Dissertation Committee Member (5):** Chang Liu (MGMT, Indiana University, 2019); Everlyne Misati (INTL BUS, Florida International University, 2020); Monica Boos (ECON, Albert-Ludwigs-Universität Freiburg, Germany, 2002); Tony Porter (POL SCI, Carleton University, 1992); Gary Lazarus (ECON, Carleton University, 1990).
- **Dissertation External Examiner (5):** Kim, Zukweon (INTL BUS, Rutgers University, 2000); Ronald Lange (ECON, Queen's University, 1982); Glen Copplestone (ECON, University of Western Ontario, 1984); Eric Asante (ECON, McMaster University, 1985); James Feehan (ECON, Carleton University, 1990).

X. PROFESSIONAL EXPERIENCE

Contributions to Publications of International Organizations

- United Nations Tax Committee. 2025. Interstitial guidance provided by the UN Subcommittee on Transfer Pricing, and approved by the United Nations Tax Committee, to accompany the UN Practical Manual on Transfer Pricing for Developing Countries.
 - Transfer Pricing and the Pharmaceutical Industry. Lead drafter of this report.
 - Transfer Pricing and Agricultural Products. A lead drafter of this report.
 - Provided several rounds of comments on other 2022-2025 Subcommittee reports.

- UNCTAD. 2024. Chapter 5: “The Global South and New International Architecture: The Quest for Development Finance”, by Lorraine Eden, Hafiz Choudhury and Anastasia Nesvetailova. In *2024 Trade and Development Report: Rethinking Development in the Age of Discontent*. UNCTAD, Geneva, CH, pp. 167-190.
- International Monetary Fund. 2009. Chapter 19: “Transfer Prices and Import and Export Price Indexes: Theory and Practice”, by W. Erwin Diewert, William F. Alterman and Lorraine Eden. In *Export and Import Price Index Manual: Theory and Practice*. IMF, Washington, DC, pp. 444-459.

Submissions in Response to Public Consultation Documents

Organization for Economic Cooperation and Development (OECD)

- Eden, Lorraine. 2023. Submission to the OECD Centre for Tax Policy and Administration in response to the *Public Consultation Document on Pillar One Amount B (17 July – 1 Sept 2023)*.
- Colliard, Jean-Edouard, Lorraine Eden and Co-Pierre Georg. 2020. Tax Complexity, Tax Certainty, and the Pillar One and Two Blueprints. Submission to the OECD Centre for Tax Policy and Administration in response to the *Public Consultation Document on the Reports on the Pillar One and Pillar Two Blueprints*. December 2020.
- Eden, Lorraine. 2020. Pillar One Tax Games. Submission to the OECD Centre for Tax Policy and Administration in response to the *Public Consultation Document on the Reports on the Pillar One and Pillar Two Blueprints*. December 2020.
- Eden, Lorraine. 2019. Submission to the OECD Centre for Tax Policy and Administration in response to the Public Consultation Document on the Commentary on the Global Anti-Base Erosion Proposal (“Globe”) Pillar Two (8 November – 2 December 2019).
- Eden, Lorraine and Oliver Treidler. 2019. Submission to the OECD Centre for Tax Policy and Administration in response to the *Public Consultation Document “Commentary on the OECD Secretariat Proposal for a “Unified Approach” under Pillar One.”* November 2019.
- Eden, Lorraine. 2016. Submission to the OECD Centre for Tax Policy and Administration in response to the Public Consultation Document on the Commentary on OECD Public Discussion Draft BEPS Actions 8-10, Revised Guidance on Profit Splits, 4 July 2016.

United Nations / UN Tax Committee

- Eden, Lorraine. 2024. Comments on 7 June 2024 Bureau’s Proposal for the Zero Draft Terms of Reference for a United Nations Framework Convention on International Tax Cooperation, June 21.
- Eden, Lorraine. 2023. Public Comment to the Secretary-General of the United Nations on UN Resolution 77/244, Promotion of Inclusive and Effective International Tax Cooperation at the United Nations. March 16.
- Eden, Lorraine. 2021. Public Comment to the United Nations Tax Committee on Draft Agenda Item 5

(Transfer Pricing) for the 23rd Session of the Committee of Experts on International Cooperation in Tax Matters. September 14.

- Eden, Lorraine. 2020. Commentary to the United Nations Tax Committee on Centralized Marketing and Sales Functions. Invited commentary on Session Papers presented at the 21st Session of the United Nations Tax Committee, October 20-29.

HM Treasury, Government of the United Kingdom

- Eden, Lorraine, Jean-Edouard Colliard and Co-Pierre Georg. 2021. Submission to HM Treasury in response to Public Consultation Document, *In Response to Call For Evidence: Review of the Office of Tax Simplification*. HM Treasury. July 5.

Work Experience with International Organizations

United Nations Subcommittee on Transfer Pricing

- Member of the Transfer Pricing Subcommittee of the United Nations Committee of Experts on International Cooperation in Tax Matters (UN Tax Committee) for 2022-2025. Involved in drafting six monographs to provide interstitial guidance to accompany the *UN Practical Manual on Transfer Pricing for Developing Countries*, to be published by the UN Tax Committee in 2025.
- Invited speaker on “Transfer Pricing and Marketing Hubs: Implications for Developing Countries” at the United Nations Workshop for Developing Countries on Practical and Policy Aspects of Taxation in a Digitalized Economy, International Tax Cooperation Section, UN Financing for Sustainable Development Office. September 9-11, 15-17, 2020 (virtual meeting).

United Nations Conference on Trade and Development (UNCTAD)

- Commentator on the UNCTAD *World Investment Report 2022* at (1) the (virtual) UNCTAD Launch in June 2022 and (2) the UNCTAD (virtual) Trade and Development Board in October 2022.
- World Investment Forum Oct. 19-22, 2021 (virtual). (1) Moderator for High-Level Panel on MNEs and Women Empowerment; speakers included Isabelle Durant (UNCTAD Deputy Secretary General) and Asa Regner (UN Assistant Secretary-General and Deputy Executive Director of UN Women). (2) Panelist on the “Interplay between International Taxation and Investment: Evaluating the Implications of G20’s Promoted Changes”. (3) Thought Leader, Academic Track Daily Roundup.
- World Investment Forum. Co-organizer and speaker at the Multi-Disciplinary Academic Conference, World Investment Forum, Geneva, CH. October 26, 2018.
- “Taxes, Foreign Direct Investment and Developing Countries”, 2011-2013. Authored the Scoping Terms of Reference (TOR) Document for the theme chapter in the 2015 *World Investment Report*.
- UNCTAD Expert Meetings: (1) Reviewer of Draft Report. UNCTAD Expert Group Meeting – Multinationals and Gender. Sept 16, 2020 (virtual meeting). (2) Experts Group on “Modernizing the *World Investment Report*”, Geneva, CH, Sept 2017. (3) Global Seminar on the 2015 World

Investment Report on “Taxation, FDI and Developing Countries”, Geneva, CH, Nov 2014. (4) Global Seminar on the 2013 *World Investment Report*, Geneva, CH, January and April 2013. (5) FDI and Gender Research Seminar, Geneva, Switzerland, April 2013. (6) Brainstorming session for the 2012 *World Investment Report*, Geneva, CH, Oct 2011.

- Panel member, AIB-UNCTAD Webinar on Investment in Sustainable Recovery: Empirical Analysis, Lessons Learnt, and a Future Research Agenda. March 29, 2021.

E15 Task Force on Trade and Investment, ICTSD and World Economic Forum

- Member of the E15 Task Force on Trade and Investment Policy, E15 Initiative on Strengthening the Global Trade System, the International Centre for Trade and Sustainable Development (ICTSD) and the World Economic Forum (WEF), Geneva, CH. Prepared policy recommendations for the 10th Ministerial Conference, World Trade Organization, Dec 2015 and Annual WEF Meeting, Jan 2016.

International Bureau for Fiscal Documentation (IBFD)

- Appointed to Editorial Board (consulting editor) of the *World Tax Journal*, 2023-2026.
- External reviewer and author of introductory overview in *Transfer Pricing and Intra-Group Financing*, Anuschka Bakker and Marc M. Levey (eds.), Amsterdam, IBFD. 2012.

Think20 (T20) G20 Italia 2021

- Member of Task Force 3 “Investment, Trade and Growth”, THINK20 (T2) Italia 2021, official engagement group of the G20. Co-author of the T20 Policy Brief, “Leveraging Digital FDI for Capacity and Competitiveness: How to be SMART” (Sept 2021). <https://www.t20italy.org/about/think20/>

World Bank/International Bank for Reconstruction and Development (IBRD)

- Expert reviewer in 2016 of Guj, Pietro et al. 2017. *Transfer Pricing in Mining with a Focus on Africa: A reference guide for practitioners*. World Bank, Washington, DC.
- Participant in “Transfer Pricing and Illicit Flows to Developing Countries” Project, 2009-2010. Authored and presented paper at World Bank conference, published in Reuter (ed.), 2012. *Draining Development: Controlling Flows of Illicit Funds from Developing Countries*, World Bank.

Work Experience with National Governments

Canada Revenue Agency

- Prepared and taught two and five day executive training courses on transfer pricing for staff at Revenue Canada/Canada Revenue Agency (CRA) and Department of Justice Canada. Thirteen courses between 1990 and 2003 in multiple locations across Canada. Approved as in-house training expert on transfer pricing for Revenue Canada/Canada Revenue Agency.

US Bureau of Labor Statistics

- International Prices Division, Bureau of Labor Statistics, US Department of Labor. Project: *Transfer pricing, intrafirm trade and the US export and import price index program*. (1) Developed new methodologies for the Bureau of Labor Statistics to use in collecting transfer prices and creating the US export and import price indexes. 2000-2005. (2) Travelled with and later provided transfer pricing training to BLS field economists, Washington, DC, 2005.

Expert Witness and Controversy Experience

Expert testimony before Governments and International Organizations

- UNCTAD, Palais des Nations, Geneva, CH, January 2013. Invited speaker. Testified before the United Nations at the UNCTAD Multi-year Expert Meeting on "Regional integration and foreign direct investment in developing and transition economies", Geneva, CH, Jan. 28-30, 2013, on "New research directions on multinationals, foreign investment and developing countries". http://unctad.org/en/pages/MeetingDetails.aspx?meetingid=202;ciimem4inf1_en.
- Canada, House of Commons, Standing Committee on External Affairs and International Trade, on the Canada-US -Mexico trade negotiations. Government of Canada, House of Commons Issue No. 69. Monday. Nov. 5, 1990, pp. 69:4-69:8.

Expert testimony before Tax and Bankruptcy Courts

- *Coca-Cola Co. v. Commissioner*, US Tax Court, No. 31183-15, filed 12/14/15. (Filed both Expert and Rebuttal Reports and testified in deposition 2017).
- *In re Nortel Networks Inc.*, US Bankruptcy Court, Delaware, No. 09-10138 (KG), filed 1/14/09. (Filed both Expert and Rebuttal Reports and testified in Deposition and in US and Canadian courts, 2014. Trial held simultaneously over closed-circuit TV in US Bankruptcy Court in Wilmington, Delaware and the Ontario Superior Court of Justice in Toronto, Canada.)

XI. PROFESSIONAL MEMBERSHIPS

- Academy of International Business (AIB).
- Academy of Management (AOM).
- American Bar Association (ABA).
- Foundation for Educational Exchange between Canada and USA (Fulbright), lifetime member.
- International Fiscal Association (IFA), US Branch.
- National Association of Business Economists (NABE).