

# LORRAINE EDEN: CURRICULUM VITAE <sup>1</sup>

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## I. PERSONAL INFORMATION

### **Biographic Information**

- Name: Lorraine Eden. (Legal married name: Lorraine Alison Boyd Eden Hermann.)
- Title: Professor Emerita of Management, Department of Management, Mays Business School, and Research Professor of Law (joint non-salary appointment), School of Law, Texas A&M University.
- Work Address: Department of Management, Mays School of Business, 415D Wehner, TAMU 4221, Texas A&M University, College Station, Texas 77843-4221. Phone 979.845.4851 (office). Fax 979.845.9641. Email: leden@tamu.edu.
- Home Address: 1019 Muirfield Village, College Station, TX 77845-8937. Phone 979.693.1626 (home); 979.777.3489 (mobile). Email: lorraine.eden@gmail.com.
- Identifiers
  - Amazon: <http://amazon.com/author/lorraine.eden>
  - Google Scholar: <http://bit.ly/2fsLj6A>
  - LinkedIn: [linkedin.com/in/lorraine-eden](https://www.linkedin.com/in/lorraine-eden)
  - ORCID: [orcid.org/0000-0002-8002-9959](https://orcid.org/0000-0002-8002-9959)
  - Personal website: [www.voxprof.com](http://www.voxprof.com)
  - SSRN: [ssrn.com/author=398344](https://ssrn.com/author=398344)
  - Texas A&M: [mays.tamu.edu/directory/leden/](https://mays.tamu.edu/directory/leden/)
  - Wikipedia: [en.wikipedia.org/wiki/Lorraine\\_Eden](https://en.wikipedia.org/wiki/Lorraine_Eden)
- Dual citizenship: Canada (country of birth) and United States (naturalized citizen 2008).
- Married to Dr. Charles F. Hermann. Three children: Jessica Eden, Karen Hermann Clements and Christopher S. Hermann.

### **Short Biography**

Core Competencies: Transfer Pricing in the Digital Economy. Strategies & Structures of Multinational Enterprises. One of the founding scholars of transfer pricing economics.

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Dr. Lorraine Eden is Professor Emerita of Management and Research Professor of Law (joint appt) at Texas A&M University where she has taught courses on transfer pricing, multinational enterprises (MNEs) and international business. She is best known for her Transfer Pricing Aggies program at Texas A&M, which has trained hundreds of Texas A&M graduate students in transfer pricing.

Dr. Eden's research interests intersect economics, international business and public policy. She is one of the founding scholars of the field of transfer pricing economics. Her 180+ scholarly publications have

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<sup>1</sup>Note: To reduce page length, selected sections of this curriculum vitae contain information for 2010-present only.

more than 14,500 Google Scholar citations. Core research topics are transfer pricing (the pricing of related party transactions), strategies and structures of multinational enterprises (MNEs), MNE-state relations, and shocks and responses (how shocks affect firm strategies and structures). Books include *Taxing Multinationals* (1998), *Multinationals in North America* (1994), *Retrospectives on Public Finance* (1991), *Multinationals and Transfer Pricing* (1985, 2017), *The Ethical Professor* (2018), *The Economics of Transfer Pricing* (2019), and *Research Methods in International Business* (2020). Her current research projects explore how transfer pricing policies and MNE strategies and structures are changing in the digital economy.

Dr. Eden served six years on the Academy of International Business (AIB) Executive Board including as 2017-2018 AIB President. She was elected an AIB Fellow in 2004, received the AIB President's Award in 2012, the WAIB inaugural Woman of the Year award in 2016, and is incoming Dean of the AIB Fellows for 2020-2023. She has many years of experience as a journal editor, including as 2007/7-2010/12 Editor-in-Chief of the *Journal of International Business Studies* (JIBS), the top-ranked journal in the field of international business. In 2019, she was honored by the European International Business Academy; received the Medal of the City from Rennes, France; and was awarded JIBS 50th Anniversary Gold Medals for her scholarly and service contributions to the journal.

For more than 30 years, Dr. Eden has been a consultant to MNEs, government and international organizations on transfer pricing and strategies of multinational enterprises. She is an affiliated expert with the Analysis Group, working primarily on transfer pricing controversy cases including as an expert witness in the Nortel Networks (US Bankruptcy Court and the Ontario Superior Court of Justice) and Coca-Cola (US Tax Court) cases.

She can be reached at [leden@tamu.edu](mailto:leden@tamu.edu).

## **II. DEGREES RECEIVED**

- Dalhousie University, Ph.D. with Distinction in Economics, 1976.
- McGill University, M.A. in Economics, 1973.
- Mount Allison University, B.A. with First Class Honors in Economics, 1970.

## **III. EMPLOYMENT HISTORY**

- Department of Management, Mays Business School, Texas A&M University
  - Professor Emerita of Management, September 1, 2019-present (retired).
  - Tenured Full Professor (half-time status) September 2018 to present.
  - Faculty Development Leave (sabbatical): Sept.-Dec. 2004; Sept. 2013-June 2014.
  - Tenured Full Professor September 2002-August 2018.
  - Tenured Associate Professor July 1995-August 2002.
- Joint Appointment (non-salary) as Research Professor, School of Law, Texas A&M University, 2019-2023.
- Visiting Research Professor, Department of Management and Human Resources, The Ohio State University, Columbus, Ohio, Sept. 2013-May 2014.
- Visiting Research Professor, Henley Business School and Department of Economics, University of

Reading, Reading, England 2011-2014.

- John H. Dunning Inaugural Visiting Research Professor, Henley Business School, University of Reading, Reading, England, 2011.
- Visiting Research Professor, Department of Management, University of Texas, Austin, Texas, 2004-2005.
- Associated Faculty Member, Bush School of Government and Public Service (served on various Bush School committees; graduate courses cross-listed and taught in the Bush School), 1995-2009.
- Visiting Full Professor (Teaching and Research) and Canada-US Fulbright Research Scholar, Kennedy School of Government, Harvard University, Cambridge, Massachusetts, 1992-1993.
- Norman Paterson School of International Affairs, Carleton University, Ottawa, Ontario, Canada. Associate Professor January 1988-June 1992; Full Professor July 1992-June 1995; Adjunct Research Professor July 1995-June 2005.
- Department of Economics, Brock University, St. Catherine's, Ontario, Canada. Assistant Professor July 1980-June 1981; Associate Professor July 1981-December 1987.
- Department of Economics, Mount St. Vincent University, Halifax, Nova Scotia, Canada. Lecturer July 1971-June 1974; Unpaid leave of absence (for PhD studies) July 1974-June 1976; Assistant Professor July 1976-June 1980.

#### IV. HONORS AND AWARDS

<u>Year</u>	<u>Type</u>	<u>Honor or Award</u>
2020-2023	Service	Incoming Dean of the Fellows of the Academy of International Business, 7/2020-7/2023.
2020	Research	Keynote speaker at Transfer Pricing Minds Americas, Miami, FL, February 25.
2019	Research	Keynote speaker at CrossBorder Solutions Transfer Pricing Summit, Scottsdale, AZ, December 7.
2019	Research	Gold Medal winner for exceptional past contributions to the <i>Journal of International Business Studies</i> during its first 50 years. Gold Medal winner for (i) Scholarly Service as a former JIBS Editor-in-Chief, and for (ii) Scholarship – 11 or More Substantive Contributions published in JIBS. Award presented at the AIB annual conference in Copenhagen, June 25.
2019	Research	Medal of the City from the Mayor of the City of Rennes for scholarly contributions to international business, and Keynote Speaker, International Scientific Committee, Rennes School of Business, Rennes CEDEX – France. Award presented in Rennes, France, June 6.
2019	Research	Tribute Scholar honored by the European International Business Academy (EIBA) for scholarly contributions to international business in <i>International Business in the Information and Digital Age</i> , edited by Alain Verbeke, Robert van

Tulder and Lucia Piscitello, Progress in International Business Research, Volume 13 (EIBA and Emerald Publishers).

- 2018 Research Keynote speaker and co-organizer of the Multi-Disciplinary Academic Conference at the 2018 UNCTAD World Investment Forum, Palais des Nations, Geneva, CH, Oct. 26. <https://worldinvestmentforum.unctad.org/#/ms-1/1> and <https://worldinvestmentforum.unctad.org/session/multidisciplinary-academic-conference/>
- 2018 Teaching Keynote speaker. OIKOS Future Lab. Geneva, CH. October. (OIKOS is an international, student-led, non-profit organization promoting sustainability in economics and management. Future Lab is the organization's annual flagship event. <https://oikos-international.org/programmes/futurelab/>)
- 2018 Research Keynote speaker. Foro de Precios de Transferencia, Federacion de Economistas (Federation of Business Economists, Transfer Pricing Forum), Mexico City, MX, September.
- 2018-present Research Emeritus Professorship in Business (September 1, 2018-present). Replaced Gina and Anthony Bahr '91 Professorship in Business (2015-August 31, 2018) when moved from full-time to half-time status on September 1, 2018.
- 2018 Research Ranked 4<sup>th</sup> most productive scholar among Management faculty and 13<sup>th</sup> among Business School faculty 2005-2015 in articles published in 24 "journals of distinction" (category 4\* Chartered Association of Business Schools' Academic Journal Guide). 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.
- 2018 Research Emerald 2018 Literati Award for Highly Commended Paper, "Culture and content matter: gender in international business and management", co-authored with Susan Forquer Gupta.
- 2018 Research Member, International Scientific Committee, Rennes School of Business, Rennes, CEDEX, France. 2018-present.
- 2017 Research Keynote speaker. Academy of International Business, Southeast Chapter, Annual Meetings, Washington, DC, October 28.
- 2016 Service Woman of the Year, 2016-2017. Selected as the inaugural holder of the Woman of the Year award by the Women in the Academy of International Business (WAIB). June 2016. <http://mays.tamu.edu/news/2016/07/08/lorraine-eden-named-waibs-woman-of-the-year/>
- 2016 Service Elected to the Academy of International Business (AIB) Executive Board as President-Elect (August 2016-July 2017), President (August 2017-July 2018) and Past President (August 2018-July 2019). Elected in April 2016.
- 2015 Research Gina and Anthony Bahr '91 Professorship in Business (2015-August 31, 2018). Replaced Center for Executive Development Professorship in Business (2014-2015) and Mays Research Fellowship (2012-2015).
- 2015 Research Service Member of the E15 Task Force on Trade and Investment, an expert task force in the E15 Initiative on Strengthening the Global Trade System, convened by the World Economic Forum and the International Commission on Trade and Sustainable Development in Geneva. Prepared policy recommendations for the

10th Ministerial Conference of the World Trade Organization, December 2015 and January 2016 Meeting of the World Economic Forum, 2015-2016.

- 2014     Research     Keynote speaker. Second International Business Research Conference, HEC Montreal, Montreal, Quebec, Canada, April 17, 2014.
- 2014     Research     Member of the Research Advisory Network to the Global Commission on Internet Governance (GCIG), a joint project of The Centre for International Governance Innovation and Chatham House (the Royal Institute of International Affairs), on the future of multi-stakeholder Internet governance, 2014-2016.
- 2014     Service        Member of the inaugural Advisory Board of the Wong MNC Center (Mr. & Mrs. S.H. Wong Center for the Study of Multinational Corporations), 2014 to present. <http://mnccenter.org/>
- 2013     Research     Academy of International Business (AIB)/Temple University Award for the Best Paper at the Annual AIB Conference, Istanbul, Turkey, July 2013. Award (with Kai Xu) for “Institutional Distance, Direction and Complementarity: Impacts on the Mode of Entry Decision”.
- 2013     Research     Scowcroft Institute Faculty Research Grant, Texas A&M University, 2013.
- 2013     Service        Testimony before the United Nations, Geneva, Switzerland, January 2013, at the UNCTAD Multi-year Expert Meeting on "Regional integration and foreign direct investment in developing and transition economies", Geneva, Switzerland on January 28-30, 2013, on the subject of “new research directions on multinationals, foreign investment and developing countries”. <http://unctad.org/en/pages/MeetingDetails.aspx?meetingid=202>.
- 2012     Research     Mays Research Fellow, Texas A&M University, 2012-2015.
- 2012     Research     Best Paper Proceedings, Academy of Management, Boston, MA. Dai, L., Eden, L., & Beamish, P.W. 2012. External threats and MNE strategy: The role of exposure, resources and coping mechanisms.
- 2012     Research / Service     John H. Dunning President’s Award for outstanding service to the Academy of International Business and the field of international business as editor-in-chief of the *Journal of International Business Studies*. Presented by the Academy of International Business at the annual meetings, Washington, DC, July 2012.
- 2011     Research     Visiting Research Professor, Henley Business School and Department of Economics, University of Reading, Reading, UK 2011-2014.
- 2011     Research     Inaugural holder of the John H. Dunning Visiting Professorship, Henley Business School, University of Reading, Reading, UK, 2011, funded by Mrs. Christine Dunning in memory of her husband John H. Dunning.
- 2011     Teaching     Mays Teaching Grant, Texas A&M University, Summer 2011.
- 2010     Research     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.
- 2009     Research     Mays Summer Research Grant, Texas A&M University, 2009.
- 2008     Research     Mays Research Fellow, Texas A&M University, 2008-2011.

- 2007 Research Editor-in-Chief, *Journal of International Business Studies*. Selected November 2006. Began processing manuscripts July 2007. Editor-in-Chief Term: January 2008-December 2010
- 2007 Service Founder's Recognition Award, Women in the Academy of International Business, 2007.
- 2006 Research Mays Summer Research Grant, Texas A&M University, 2006 (with Paige Fields and Hong Zhu).
- 2006 Research Deputy Editor-in-Chief, *Journal of International Business Studies*, January 2006 – December 2007.
- 2006 Research *Who's Who in America - 2006, 60<sup>th</sup> Diamond Edition*, Marquis 2005 (Lorraine Alison Boyd).
- 2006 Service Co-chair, Back & Forth Committee, Academy of International Business Fellows, 2006-2007.
- 2006 Service Rotary International Paul Harris Fellow, nominated by the Bryan Rotary Club, 2006.
- 2005 Service Organizer and Chair, Junior Faculty Consortium, International Management Division, Academy of Management annual meetings, Hawaii, 2005.
- 2004 Research Elected as a Fellow of the Academy of International Business, May 2004.
- 2004 Teaching External evaluator, International MBA Program, Florida International University, October 2004.
- 2004 Teaching Member of the Global Advisory Board to the Ph.D. program on International Business Administration at Texas A&M International University, Laredo, Texas, 2004.
- 2003 Research Departmental Editor, International Political Economy, *Journal of International Business Studies*, 2003-2006.
- 2003 Research Ad hoc best reviewer award, Business Policy and Strategy Division, Academy of Management, 2003.
- 2003 Teaching Member of the External Faculty Advisors Board to the Ph.D. program in International Business at the University of Texas at El Paso, 2003.
- 2002 Research Texas A&M Faculty Fellow Fall 2002-Summer 2007. One of 12 Fellows selected yearly by the University. Each Fellow receives \$20,000 per year for five years.
- 2002 Research Named as the *James Earl Rudder Faculty Fellow*, Department of Management, Texas A&M University, 2001-2002.
- 2002 Research First recipient of the 2002 *Bush Excellence in International Research Faculty Award*, given annually by the Bush Presidential Library Foundation in recognition of Texas A&M faculty who make outstanding contributions to international research. Feb 2002.
- 2002 Service Chair, Ad Hoc Committee on International Diversity, Academy of Management, 2002-2004.
- 2002 Teaching Elected an honorary member, International Gold Key Society, Texas A&M University, Nov. 2002 (maximum of five TAMU faculty chosen per year).

- 2001 Research *Best Paper Proceedings*, International Management Division, Academy of Management, August 2001. Opening the Black Box: The Multinational Enterprise and the Costs of Doing Business Abroad (with Stewart Miller).
- 2001 Research *Best Paper Proceedings*, International Management Division, Academy of Management, August 2001. Safe in My Backyard: Strategic Trade Policy and Rivalry among Multinational Enterprises (with Tieying Yu).
- 2001 Service Founder, Women in the Academy of International Business (WAIB), 2001-2003; Past President 2003-2005, Executive Board member (ex officio): 2005-present.
- 2000 Service Vice President and Program Chair, Academy of International Business, Nov. 2000-August 2002.
- 2000 Teaching Texas A&M University *Former Students Association Award for Excellence in Faculty Teaching*, Mays College of Business, 2000.
- 1999 Research *Who's Who in International Business Education and Research*. 1999 (pages 128-132).
- 1997 Teaching First recipient of the Trans-Texas Video Teleconferencing (TTVN) Prize for Most Innovative Use of the Trans-Texas Video Teleconferencing Network. 1997-98.
- 1996 Research Beta Gamma Sigma (Honor Society for AACSB Accredited Business Programs), 1996 - present.
- 1996 Service Board of Directors, International Trade and Finance Association, 1996-98.
- 1995 Research Adjunct Research Professor, School of International Affairs, Carleton University, 1995-98. Reappointed, 1998-2001, and 2001-2004.
- 1995 Research Phi Beta Delta (Honor Society for International Scholars), 1995 - present.
- 1995 Research Research Associate, International Motor Vehicle Project, Massachusetts Institute of Technology, 1995-99.
- 1995 Service Associate Director, Center for the Study of Western Hemispheric Trade, Texas A&M University, 1995-97.
- 1995 Service Co-founder and first secretary, Active Learning in International Affairs (ALIAS), International Studies Association, 1995-97.
- 1994 Research Carleton University Faculty Research Achievement Award. 1994-95.
- 1994 Service President, International Political Economy Section, International Studies Association, 1994-96; Program Chair 1994-95. Vice-President 1992-94. Past President 1996-97.
- 1993 Research Visiting Research Professor, Department of Finance, College of Business, The Ohio State University, July-August 1993; June-December 1994.
- 1992 Research Canada-US Fulbright Research Fellowship at Harvard University. 1992-93.
- 1992 Research Visiting Professor and Research Fellow, Center for Business and Government, Kennedy School of Government, Harvard University, 1992-93.
- 1991 Teaching Pew Faculty Fellowship in International Affairs: The John F. Kennedy School of Government, Harvard University, 1991-92.
- 1990 Service Founding Coordinator of the Women Economists Network (WEN) 1990-91; President 1991-92; Past President 1992-93.

- 1990 Service Vice-President, Canadian Economics Association, 1990-91.
- 1990 Research Testimony before the House of Commons in Canada, 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. November 5, 1990. Pages 69:4-69:8.
- 1985 Research Elected to membership in International Institute of Public Finance, 1985.
- 1984 Research Visiting Research Fellow, Dalhousie University, Center for International Business Studies, summer 1984.
- 1974 Research Dalhousie University: Canada Council Doctoral Fellowship, Special Killam Fellowship, Graduate Fellowship, 1974-1976. PhD in Economics, First Class Honors with Distinction, 1976.
- 1970 Research McGill University: *McConnell Fellowship, New Brunswick Postgraduate Fellowship*, 1970-71.
- 1966 Research Mount Allison University: *Sharp Scholarship* and various undergraduate scholarships, 1966-70. Prize for Highest Standing in Economics, 1969. B.A. in Economics, Summa Cum Laude, 1970.
- 1966 Research St. Stephen High School, St. Stephen, New Brunswick, Canada: *Governor General's Medal* and High School Valedictorian, June 1966.

## V. SCHOLARLY PUBLICATIONS

### Scholarly Impact Statistics

- Google Scholar Citations (as of 22 April 2020)

<b>Metric</b>	<b>ALL</b>	<b>SINCE 2015</b>
Number of Citations	14,533	7,451
H-index	41	31
i10-index	88	59

- Gold Medal winner for exceptional past contributions to the *Journal of International Business Studies* during its first 50 years. (i) Gold Medal for Scholarly Service as a former JIBS Editor-in-Chief, and (ii) Gold Medal for Scholarship - 11 or More Substantive Contributions published in JIBS. Award presented at the AIB annual conference in Copenhagen, June 25.
- Ranked fourth (4<sup>th</sup>) most productive scholar among Management faculty and thirteenth (13<sup>th</sup>) most productive scholar among Business School faculty between 2005 and 2015 in terms of number of articles published in 24 “journals of distinction” (category 4\* journals in the Chartered Association of Business Schools’ Academic Journal 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 (see pages 223 and 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.



## **Scholarly Publications**

*Note: This list includes forthcoming publications. Reprints and re-publications are excluded.*

Journal articles	76
Books	9
Special issues of journals	6
Chapters in books and research annuals	51
Technical reports and monographs	11
Editorials in scholarly journals	23
Articles in conference proceedings	10
Total	186

## **Other Publications (Print and Digital)**

*This list includes forthcoming publications. Items listed above under Scholarly Publications are not included on this list.*

Commentaries submitted to international organizations	3
Articles in professional association publications (print and/or digital)	8
Book reviews in scholarly journals	10
Publications in university working paper series	7
Unpublished technical reports	8
Scholarly research for degree programs	3
Business media	2
Digital publications (Blogs, LinkedIn)	56
Total	97

## **Journal Articles (Scholarly and Professional)**

1. Eden, Lorraine. 2019-2020. Taxing Multinationals – The GloBE Proposal for a Global Minimum Tax. *Bloomberg Daily Tax Report*, December 6, 2019. Also published in *Tax Management International Journal*, January 2020. <https://news.bloombergtax.com/daily-tax-report/insight-taxing-multinationals-the-globe-proposal-for-a-global-minimum-tax>
  - a. Earlier version submitted to the OECD on Dec. 2, 2019 as “Commentary on Global Anti-Base Erosion Proposal (“Globe”) - Pillar Two - 8 Nov – 2 Dec 2019, Public Consultation Document. Paris: OECD.” Published in *Public Comments Received on the Global Anti-Base Erosion (GloBE) Proposal under Pillar Two*. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3497886](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3497886)
2. Eden, Lorraine and Oliver Treidler. 2019. Taxing the Digital Economy: Pillar One Is Not BEPS 2. *Tax Management International Journal*. Also published in *Bloomberg Daily Tax Report*. November.
  - a. Earlier version submitted to the OECD on Nov. 7, 2019, as “Commentary on OECD Secretariat Proposal for a “Unified Approach” under Pillar One, 9 Oct - 12 Nov 2019. Published in *Public Comments Received on the Secretariat Proposal for a “Unified Approach” under Pillar One, November 15, 2019*. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3485881](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3485881)
3. Eden, Lorraine. 2019. The Arm’s Length Standard Is Not the Problem. *Tax Management International Journal*. Also published in *Bloomberg Tax Daily Tax Report* and *Tax Memorandum*. October 2019.

- a. **Republished in 2019:** Also published in Spanish in *IDC Asesor Fiscal, Juridico y Laboral (IDC)*, November 2019, <https://idconline.mx/>
  - b. Video at <https://www.youtube.com/watch?v=7oLV1v5GC0g&feature=youtu.be>
4. Eden, Lorraine, Niraja Srinivasan and Srin Lalapet. 2019. Transfer Pricing Challenges in the Digital Economy: Hic Sunt Dracones? *Tax Management International Journal*, 48 (June 14). Also published in *Bloomberg Tax Daily Tax Report*. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3412546](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3412546)
  5. Srinivasan, Niraja, Srin Lalapet and Lorraine Eden. 2019. Transfer Pricing Challenges in the Digital Economy: A Case Study of the Internet of Things. *Tax Management International Journal*, 46 (June 14). Also published in *Bloomberg Tax Daily Tax Report*. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3412555](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3412555)
  6. Miller, Stewart R., Lorraine Eden and Dan Li. 2018 (online). CSR Reputation and Firm Performance: A Dynamic Approach. *Journal of Business Ethics*. Advance online publication Nov 2018 at <https://bit.ly/2RS2pfG>
  7. 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. <https://bit.ly/2NoNJXi>. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3244058](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3244058)
  8. 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. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2984471](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2984471)
  9. 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. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2925609](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2925609)
  10. Dai, Li, Lorraine Eden and Paul Beamish. 2017. Caught in the Crossfire: Dimensions of Vulnerability and Foreign Multinationals' Exit from War-Afflicted Countries. *Strategic Management Journal*, 38(7): 1478-1498. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2849710](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2849710)
    - a. **Republished in 2020** in the *Strategic Management Journal* Virtual Issue on "Strategic Responses to Crises", April. [https://onlinelibrary.wiley.com/doi/toc/10.1002/\(ISSN\)1097-0266.strategic-responses-to-crisis](https://onlinelibrary.wiley.com/doi/toc/10.1002/(ISSN)1097-0266.strategic-responses-to-crisis)
  11. 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.
  12. 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.
  13. He, Xiaoming, Lorraine Eden and Michael Hitt. 2016. The Renaissance of State Owned Multinationals. *Thunderbird International Business Review*, 58.2 (March/April): 117-129.
  14. 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 (August): 554-

578. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2234552](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2234552)
15. 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.  
[https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1994466](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1994466)
  16. 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.
  17. 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.
  18. 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. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1928016](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1928016)
  19. Eden, Lorraine. 2011. Launching a career in transfer pricing. *Transfer Pricing International Journal*, October: 26-30.
  20. Eden, Lorraine, Li Dai and Dan Li. 2010-2011. International Business, International Management, International Strategy: What's in a Name? *International Studies of Management & Organization*, 40(4): 54-68.
    - a. **Republished in 2013:** Republished as the book chapter, "What's in a Name?" in *The Routledge Companion to International Management Education*, edited by Denise Tsang, Hamid H. Kazeroony and Guy Ellis. Routledge, pp. 33-61, Routledge: London and New York.
  21. 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.
  22. Eden, Lorraine and Li Dai. 2010. Rethinking the O in Dunning's OLI/Eclectic Paradigm. *Multinational Business Review*, 18.1, 13-34.
  23. Eden, Lorraine. 2010. Are IPE journals becoming boring? *International Studies Quarterly*, 54, 901-907.
  24. Chang, Sea-Jin, Arjen van Witteloostuijn and Lorraine Eden. 2010. From the JIBS Editors: Common method variance in international business research. *Journal of International Business Studies*, 41.3: 178-184.
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6. Eden, Lorraine. 2018. AIB Minneapolis 2018: Exploring the Digital Future of International Business. Letter from the AIB President. *Academy of International Business Newsletter*. May.
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2. Eden, Lorraine 1973. *The Consequences of Mild Inflation - the Canadian Case 1974-70*, unpublished M.A. Thesis, McGill University, Montreal. Supervisor: Dr. Alex Vicas.
3. Eden, Lorraine 1970. *Money Matters, Money Doesn't Matter*, unpublished B.A. Honors Thesis, Mount Allison University. Supervisor: Dr. William Cunningham.

### **Digital Publications**

***Transfer Pricing Aggies Student Profile Book* ([https://issuu.com/tp\\_aggies](https://issuu.com/tp_aggies))**

Edition	Semester	Year	Month	Number of Student Profiles
1	Fall	2012	9	30
2	Spring-1	2013	3	11
3	Spring-2	2013	5	10
4	Fall	2014	10	24
5	Spring-1	2015	1	17
6	Spring-2	2015	5	11
7	Fall	2015	9	52
8	Spring-1	2016	2	33
9	Spring-2	2016	5	7
10	Fall	2016	9	42
11	Spring	2017	2	27
12	Fall	2017	9	32
13	Fall	2018	9	38

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1. Eden, Lorraine, Kathy Lund Dean and Paul Vaaler. 2015. *Thanks! It's been great, and THE ETHICIST moves on.....* The Ethicist Blog. Academy of Management. February.
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***LinkedIn – Lorraine Eden (<https://www.linkedin.com/today/author/lorraineeden?trk=pprof-feed>)***

1. Eden, Lorraine. 2018. *TP Aggies Student Profile Book (Sept 2018) Now Available!* Sept. 12.
2. Eden, Lorraine. 2018. *The Ethical Professor*. May 9.
3. Eden, Lorraine. 2018. *Transfer Pricing as a Career Option at Texas A&M University*. May 8.
4. Eden, Lorraine. 2017. *Tax Me if You Can*. October 30.
5. Eden, Lorraine. 2017. *The Ethical Professor*. October 30.
6. Eden, Lorraine. 2017. *The Berry Ratio Revisited*. October 11.
7. Eden, Lorraine. 2017. *Lorraine Eden's Top 40 Grammar Tips*. October 1.
8. Eden, Lorraine. 2017. *Transfer Pricing Aggies Student Profile Book, Fall 2017*. September 22.
9. Eden, Lorraine. 2017. *Happy Birthday, Charlie!* July 14.
10. Eden, Lorraine. 2017. *From an Outsider to an Insider*. February 4.
11. Eden, Lorraine. 2017. *Transfer Pricing Aggies Student Profile Book now Available for Download*. February 3.
12. Eden, Lorraine. 2016. *Transfer Pricing and Texas A&M Bush School Students*. November 1.
13. Eden, Lorraine. 2016. *42 Transfer Pricing Students on the Market*. September 14.
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15. Eden, Lorraine. 2016. *Lorraine's Parthenon Turns 50*. May 30.
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26. Eden, Lorraine. 2015. *Basa Village Foundation, Nepal*. April 28.
27. Eden, Lorraine. 2015. *Transfer Pricing Aggies*. February 22.
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2. Eden, Lorraine. 2020. Pillar One Is Not BEPS 2. The FIONA Show, Episode 33. CrossBorder Solutions. January 29. <https://iono.fm/e/809647>
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5. Eden, Lorraine. 2018. Country-by-Country Reporting May Reveal Revenues that Multinationals Protect from Taxation. Texas A&M University. Video. <https://www.youtube.com/watch?reload=9&v=YYuKhOsD-uA>
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8. Eden, Lorraine and Others. 2011. Ethics Video Series, Academy of Management.
  - a. Plagiarism. <https://www.youtube.com/watch?v=qDaKowkuuyc>
  - b. Global Ethics in Publishing. <https://www.youtube.com/watch?v=2tyAXzrHW98>
9. Eden, Lorraine. Various videotaped talks and presentations at Academy of International Business annual conferences, 2008-present. <https://www.aib.world/about/history/past-conferences/past-conference-videos/#tab-a52029f84e708bd5588>

## VII. RESEARCH IN PROGRESS

### In Review

- Eden, Lorraine, Daniel Indro, Stewart R. Miller and Malika Richards. Timing as a Signal in Cross-Border Seasoned Equity Offerings. Second R&R at *International Business Review*.
- Eden, Lorraine and Fernanda Wagstaff. Evidence-Based Policymaking and the Wicked Problem of SDG 5 Gender Equality. Second R&R at *Journal of International Business Policy* for the *Special Issue on “The Sustainable Development Goals: What Role for Multinational Enterprises?”*

### In Preparation for Resubmission

- Lui, Cathy, Dan Li, Lorraine Eden and Marjorie Lyles. Danger from a Distance: The Role of Executives’ Social Distance in Multinationals’ Divestment Responses to Host Country Terrorist Attacks. Revise and resubmit at *Strategic Management Journal*.

### In Preparation for First Submission

#### Transfer Pricing

- Eden, Lorraine. Taxing the Digital Economy: The Simple Analytics of Pillar One.
- Eden, Lorraine. The Risky Business of Global Formulary Apportionment.
- Eden, Lorraine and Niraja Srinivasan. The Economics of Digital Business Models: Internet of Things, Platforms, and Hardware as a Service. (In preparation as part of the World Economic Forum T20 Policy Brief on “Digital FDI: How to Leverage FDI to Grow the Digital Economy”.
- Eden, Lorraine/William Byrnes. Valuing Marketing Intangibles: Lessons from the Amazon Case.
- Eden, Lorraine/William Byrnes: Transfer Pricing, APAs and the Starbucks-Netherlands State Aid Case.
- Eden, Lorraine and L. Murphy Smith. The Ethics of Transfer Pricing.
- Eden, Lorraine/Matt Josefy/Dan Li. Intellectual Property Licensing: Comparing Arm’s Length and Related Party Agreements. (research project using ktMINE data to analyze IP licenses).

#### Editorials

- Arnold, Denis, Sjoerd Beugelsdijk and Lorraine Eden. Research Ethics in International Business. In preparation as an editorial for *Journal of International Business Studies*.
- Miller, Stewart, Lorraine Eden, Dan Li and Robert Weiner. Event Study Methodology and International Business. In preparation as an editorial for *Journal of International Business Studies*.
- Beugelsdijk, Sjoerd, Lorraine Eden and Denis Arnold. Ethical Pitfalls in Multilateral International

Research Alliances. In preparation as an editorial for *Journal of International Business Studies*.

### Other Projects

- Dai, Li, Lorraine Eden and Paul Beamish. The Timing and Mode of Foreign Exit.
- Eden, Lorraine, Ralph Carter and Kevin McSweeney. Economics, Politics and Trade Policy Wins.
- Xu, Kai, Lorraine Eden and Stewart R. Miller. Institutional Distance, Direction and Complementarity: Impacts on the Mode of Entry Decision.

### Research Projects

- *Digital Economics and Digital Business Strategy: Understanding International Production in the Digital Age*. Researcher in a group project organized by the World Economic Forum (PI: Matthew Stephenson) exploring the economics of digital business models and their implications for MNE strategies and structures, international production, related party transactions and transfer pricing. Approved for delivery to the G20 in Fall 2020.
- *Micro-Manufacture: Reimagining How We Make Things in the Digital Economy*. Principal Investigator, Francis Quek (Computer Science/Engineering, Texas A&M). I am one of the co-PIs on a project proposal by Francis Quek (TAMU Computer Science). Under review at the National Science Foundation.

### Book Manuscripts in Preparation

- Eden, Lorraine. *Principles of Transfer Pricing*. A professional book for practitioners (tax, law and economics) and for teaching transfer pricing courses in universities and executive training courses. In first draft.
- Eden, Lorraine. *Principles of International Business*. Masters-level textbook on international business.

## **VIII. PRESENTATIONS \***

**Note: The list below starts with January 1, 2010; list of activities before 2010 available on request.**

1. Eden, Lorraine. 2020. Keynote speaker. “The Arm’s Length Standard – Happy 85<sup>th</sup> Anniversary?” Transfer pricing Minds Americas. Miami. February 25.
2. Eden, Lorraine. 2020. Speaker. Panel on “Outcomes in Transfer Pricing Litigation: An Economic Perspective.” Transfer Pricing Minds Americas. Miami. February 26.
3. Eden, Lorraine. 2019. Keynote speaker on “The Arm’s Length Standard Is Not the Problem” at CrossBorder Solutions Transfer Pricing Summit, Scottsdale AZ, December 7, 2019.
4. Eden, Lorraine. 2019. Moderator of panel on “Remaking Transfer Pricing for the Digital Age, Part



Two” at the American Bar Association Fall Tax Meeting, San Francisco, October 4, 2019.

5. Eden, Lorraine. 2019. Roundtable participant. Cambridge Forum on International Transfer Pricing Law. Surrey, UK. October 20-22.
6. Eden, Lorraine. 2019. Panel member at Plenary Workshop #56, “How may FIUs leverage transfer pricing expertise to uncover money laundering?” 37th International Symposium on Economic Crime. University of Cambridge, Cambridge, UK. September 1-8.
7. Eden, Lorraine. 2019. Chair and panelist. “Which financial ratios are most reliable for purposes of tax authority measurement of transfer pricing non-compliance?” National Association of Business Economists annual Transfer Pricing Symposium, Washington, DC. July 17, 2019.
8. Eden, Lorraine, Daniel Indro, Stewart R. Miller and Malika Richards. 2019. *Liability of Foreignness, Market Timing and Performance of Cross-Border SEOs*. Presented in a Competitive Session at the Academy of International Business annual meetings, Copenhagen. June 27.
9. Eden, Lorraine. 2019. *Ethical Dilemmas Facing New Entrants to the Academy*. Ethics Workshop at the AIB/Sheth Doctoral Student Consortium. Annual meetings of the Academy of International Business, Copenhagen. June 24.
10. Eden, Lorraine. 2019. Chair and panelist for “*The AIB History Project*”. Panel session at the annual meetings of the Academy of International Business, Copenhagen. June 25.
11. Eden, Lorraine. 2019. *From EPZs to SEZs to SDG Zones (SDGZs)?* Panelist/discussant on a Special Session, “World Investment Report 1019: Special Economic Zones”. Annual meetings of the Academy of International Business, Copenhagen, June 25.
12. Eden, Lorraine. 2019. “The times they are a’changing --- again: Can we learn anything from the past?” Invited keynote address after receiving the Medal of the City from the Mayor of the City of Rennes, on behalf of the International Scientific Committee, Rennes School of Business, Rennes CEDEX – France. June 6.
13. Eden, Lorraine, Niraja Srinivasan and Srinil Lalapet. 2019. *Transfer Pricing Challenges in the Digital Economy: A Case Study of the Internet of Things*. Presented at the annual meetings of the International Studies Association, March 27-30.
14. Eden, Lorraine. 2019. “*Transfer Pricing and Global Strategy: Moving from Pricing Transactions to the C-Suite*”. Presented at the Rotman Institute for International Business Discussion Series “Current Events in International Business”, Rotman School of Management, University of Toronto, Toronto, Canada. February 12.
15. Eden, Lorraine. 2018. *Leaders, Fellows and Founders of Professional Organizations within the Academy*. Organizer and panelist. Academy of International Business Southeast Chapter annual conference. Nashville, TN. November.
16. Eden, Lorraine. 2018. *Ethical Dilemmas in the Academy*. Ethics workshop at the Academy of International Business Southeast Chapter annual conference. Nashville, TN. November.
17. Eden, Lorraine. 2018. Panelist: Responsible Research in Business and Management (RRBM). Academy of International Business Southeast Chapter annual conference. Nashville, TN. November.

18. Eden, Lorraine. 2018. *Global Value Chains, the Digital Economy and the New Industrial Revolution*. Co-organizer, Keynote Presenter and Moderator. Multi-disciplinary Academic Conference, World Investment Forum. UNCTAD, Geneva, CH. October.
19. Eden, Lorraine. 2018. *Advance Pricing Agreements, State Aid and Tax (Un)certainty*. Multi-disciplinary Academic Conference, World Investment Forum. UNCTAD, Geneva, CH. October.
20. Eden, Lorraine. 2018. Keynote speech on “The Unintended Consequences of Advance Pricing Agreements” to the Mexican National Association of Business Economists. Mexico City. September.
21. Eden, Lorraine. 2018. *The Ethical Professor*. Co-chair of All-Academy Theme Professional Development Workshop. Academy of Management Annual Conference. Chicago. August.
22. Eden, Lorraine. 2018. *Theory Development in Management Research*. Presenter at Professional Development Workshop. Academy of Management Annual Conference. Chicago. August.
23. Eden, Lorraine. 2018. *Transfer Pricing in the Digital Economy*. Panel member. Transfer Pricing Symposium, National Association of Business Economists (NABE). Washington, DC. July.
24. Eden, Lorraine. 2018. Co-organizer with Nancy Adler of the AIB Women Fellows First Leadership Retreat. Academy of International Business annual meetings, Minneapolis, MN, June.
25. Eden, Lorraine. 2018. Presenter in UNCTAD panel, “FDI and New Industrial Policies: World Investment Report 2018.” Academy of International Business annual meetings, Minneapolis, MN, June.
26. Eden, Lorraine. 2018. Chair/Presenter in Special Session “Introducing AIB’s Code of Ethics.” Academy of International Business annual meetings, Minneapolis, MN, June.
27. Eden, Lorraine. 2018. Chair/Presenter in AIB’s 60<sup>th</sup> Anniversary Townhall with the AIB Past Presidents. Academy of International Business annual meetings, Minneapolis, MN, June.
28. Eden, Lorraine. 2018. “Transfer Pricing and State Aid: Lessons from the Starbucks-Netherlands Case.” Presented at the annual meetings of the International Studies Association, San Francisco, CA. April.
29. Eden, Lorraine. 2017. “Tax Me if You Can.” Keynote address. Academy of International Business, Southeast Chapter annual conference. Washington, DC. October 28.
30. Eden, Lorraine. 2017. Co-moderator of Transfer Pricing Debate at NABE (National Association of Business Economists) Transfer Pricing Symposium. Washington, DC. July.
31. Eden, Lorraine, Daniel Indro, Stewart R. Miller and Malika Richards. 2017. “Does Timing Matter? Performance of Foreign SEOs in the U.S. Stock Market.” Academy of International Business annual meetings, Dubai. July 1-5.
32. Eden, Lorraine. 2017. Speaker on a panel on "Corporate Taxation and Tax Havens: Trends, Mechanisms, Enablers, and Possible Solutions," Academy of International Business annual meetings, Dubai. July 1-5.

33. Eden, Lorraine. 2017. Speaker on a panel of “Globalization under Threat: How Should IB Respond?” Academy of International Business annual meetings, Dubai. July 1-5.
34. Eden, Lorraine. 2017. “Professional Ethics in Academia: Ethical Research Dilemmas for PhD Students.” PhD Consortium. Academy of International Business annual meetings, Dubai. July 1-5.
35. Eden, Lorraine. 2017. “Deconstructing Success.” Presentation at panel, “Emerging Markets Strategy Research: A Reflection since AMJ 2000.” Seventh Annual Strategy Symposium on Emerging Markets, Rice University, May 18-19.
36. Eden, Lorraine. 2016. Speaker on panel on “Multinationals and Income Shifting”. Strategic Management Society (SMS) Annual Meetings, Berlin, Germany. September 17-20.
37. Eden, Lorraine. 2016. Invited Speaker. AOM Mid-Career Faculty Consortium. Academy of Management annual meetings, Anaheim, August.
38. Eden, Lorraine. 2016. Invited Speaker. AOM Professional Development Workshop (PDW) on “How to Write Better Theory”. Academy of Management annual meetings, Anaheim, August.
39. Huh, Dong Wook and Lorraine Eden. 2016. A Tale of Two Levels: The Diversification of Business Groups. Presented at the annual meetings of the Academy of Management, Anaheim, August.
40. Eden, Lorraine. 2016. Panel Co-Organizer and Speaker. WAIB (Women in the Academy of International Business) 15th Anniversary Panel of Women AIB Fellows. Academy of International Business annual meetings, New Orleans, June.
41. Eden, Lorraine. 2016. Academy of International Business (AIB) Fellows Café on “Transfer Pricing: So Much in the News, So Little in our International Business Research”. Academy of International Business annual meetings, New Orleans, June.
42. Eden, Lorraine. 2016. Invited Speaker, Annual Investment Meeting (AIM), Dubai, United Arab Emirates, April 11-15. Panelist on Parallel Session Two: New Forms of FDI in Manufacturing, Scale and Scope and Implications on Development.
43. Eden, Lorraine. 2016. Invited Speaker, Annual Investment Meeting (AIM), Dubai, United Arab Emirates, April 11-15. Panelist on Plenary Session Eight: New Incentive Packages to Attract NFIs, Effectiveness and Impact.
44. Eden, Lorraine. 2015. Panelist on WAIB/Cross-Cultural Management Special Track: Gender in International Business Research/Management, Academy of International Business South-East Region annual meetings, November, Savannah, Georgia.
45. Eden, Lorraine. 2015. Invited keynote speaker on “Ethics and the PhD Student” at the Junior Doctoral Consortium, International Management Division, Academy of Management annual meetings, Vancouver, August.
46. Eden, Lorraine. 2015. Faculty participant at the Junior Doctoral Consortium, International Management Division, Academy of Management annual meetings, Vancouver, August.
47. Eden, Lorraine. 2015. Panelist at the AOM Professional Development Workshop (PDW) on “Succeeding as a Researcher: How to Write Better Theory”, Academy of Management annual

meetings, Vancouver, August.

48. Eden, Lorraine. 2015. "Multinationals and Investment Policy in the Digital Economy". Presented at the First Expert Meeting of the E15 Task Force on Investment Policy, World Economic Forum and the International Commission on Trade and Sustainable Development. Geneva, March.
49. Eden, Lorraine. 2015. Organized, chaired and participated in two interactive case teaching workshops by the Pew Fellows. International Studies Association annual meetings, New Orleans, February.
50. Eden, Lorraine. 2015. "Intangibles in Litigation: Defining and Valuing "Compensable" Intangibles", with Jonathan Hunt (Mayer Brown). American Bar Association, Transfer Pricing Section. Houston, January.
51. Eden, Lorraine. 2014. Invited participant. University of South Carolina Workshop on "Institutional Theories and International Business Research", Charleston, South Carolina. October 3-4. Topic: Economic Institutions and International Business Research.
52. Dan Li, Lorraine Eden and Matt Josefy. 2014. Knowledge Management in Multi-Partner International Alliances. Presented by Dan Li and Matt Josefy at the annual Strategic Management Society meetings, September.
53. Eden, Lorraine. 2014. Invited speaker on "Multinational Exit from War Zones", Faculty Seminar, School of Business, University of Alberta, Canada, September.
54. Dai, Li and Lorraine Eden. 2014. Multinational Strategies in War Zones. Presented at the annual meetings of the Academy of Management, Philadelphia, August 1-5, as part of a Symposium on "MNEs in Deadly Environments: Strategic Response to Disasters, Conflict and Crime."
55. Eden, Lorraine. 2014. Invited Keynote speaker, 2<sup>nd</sup> International Business Research Conference, HEC Montreal, Montreal, Canada. April 17. Topic: Multinational Exit from War Zones.
56. Eden, Lorraine. 2014. Moderator/chair of panel on "25 Years of Case Teaching in International Relations" at International Studies Association annual meetings, Toronto, Canada, March 28.
57. Eden, Lorraine and Li Dai. 2014. Multinational Exit from War Zones. Presented at the annual meetings of the International Studies Association, Toronto, Canada, March 26.
58. Eden, Lorraine. 2014. Organizer and Chair of two panels on "Foreign Direct Investment and Geography" at the annual meetings International Studies Association, Toronto, Canada, March 26.
59. Eden, Lorraine. 2014. Invited speaker, Faculty Workshop, Boston College, March 12. Topic: Multinational Exit from War Zones.
60. Eden, Lorraine. 2014. Invited speaker. Faculty workshop, The Ohio State University, February 11. Multinational Exit from War Zones.
61. Eden, Lorraine. 2013. Invited speaker, Faculty Workshop, Cass Business School, London, UK. November 22. Presentation: "Caught in the Crossfire: Multinationals in War Zones".
62. Eden, Lorraine. 2013. Authors' Workshop. King's College London, London, UK. Paper: "The Arm's Length Standard: Making It Work in a 21<sup>st</sup> Century World of Multinationals and Nation States",

November 23-24, 2013.

63. Eden, Lorraine. 2013. Discussant for Lee Sheppard's paper on "Developing Countries and Tax Avoidance". Authors' Workshop. King's College London, London, UK. November 2013.
64. Eden, Lorraine. 2013. Responder. Thought Leadership Forum on "Global Tax Justice and Illicit Financial Flows". Dickson Poon School of Law, King's College London, London, UK, November 22, 2013.
65. Xu, Kai and Lorraine Eden. 2013. Institutional Distance, Direction and Complementarity: Impacts on the Mode of Entry Decision. Presented in a competitive paper session at the annual meetings of the Academy of International Business, Istanbul, July 2013. Paper received the AIB/Temple University Best Paper Award for the best paper presented at the conference.
66. Eden, Lorraine. 2013. Co-Presenter. UNCTAD Panel on the 2013 World Investment Report. Global Value Chains: Investment and Trade for Development. Annual meetings of the Academy of International Business, Istanbul, Turkey. July 2013.
67. Eden, Lorraine. 2013. Panelist in Roundtable on Institutions and Strategy. Annual meetings of the Academy of International Business, Istanbul, Turkey. July 2013.
68. Eden, Lorraine. 2013. Taxing Multinationals in Developing Countries. Presented at the annual meetings of the International Studies Association, San Francisco, April 4, 2013.
69. Dai, Li, Lorraine Eden and Paul Beamish. 2013. Foreign Subsidiary Exit in Response to External Threats: The Role of Exposure, Resources and Coping Mechanisms. Invited faculty seminar at Indiana University, March.
70. Miller, Stewart, Lorraine Eden, Joanna Tochman Campbell and Dan Li. 2012. Not All Legitimacy is Created Equal: Performance Implications of Dynamic Legitimacy. Presented at the annual meetings of the Academy of Management, Boston, August.
71. Dai, Li, Lorraine Eden and Paul Beamish. 2012. External threats and MNE strategy: The role of exposure, resources and coping mechanisms. Presented at the annual meetings of the Academy of Management, Boston, August.
72. Dai, Li, Lorraine Eden and Paul Beamish. 2012. Place, Space and Hot Spots: MNE Responses to Political Conflicts in Host Countries. Presented at the International Studies Association annual meetings, San Diego, April.
73. Dai, Li, Lorraine Eden and Paul Beamish. 2012. External threats and MNE strategy: The role of exposure, resources and coping mechanisms. Invited faculty seminar at Carleton University, Ottawa, Canada, March.
74. Worthington, William J., Michael A. Hitt, R. Duane Ireland and Lorraine Eden. 2011. Unbundling the Bundling Process: SME Response to Environmental Context. Presented at the annual meetings of the Strategic Management Society, Miami, September.
75. Brymer, Rhett and Lorraine Eden. 2011. Intra-Organizational Rent Appropriation: Favorable Conditions and Human Capital Bargaining in Multinational Enterprises. Presented at the annual meetings of the Strategic Management Society, Miami, September.

76. Miller, Stewart, Lorraine Eden and Joanna Tochman Campbell. 2011. Learning from self and from others: The Janus-faced view of learning from high risk variation. Presented at the annual meetings of the Academy of Management, San Antonio, TX, August.
77. Li, Dai and Lorraine Eden. 2011. Caught in the Crossfire: Strategies of MNEs in Host Countries at War. Presented at the Symposium on "Integrating Political Science into International Business Research", at the annual meetings of the Academy of Management, San Antonio, TX, August.
78. He, Xiaoming, Lorraine Eden and Michael Hitt. 2011. The Role of Institutional Investors in State Multinationals: A Multi-Country Study. Presented at the annual meetings of the Academy of International Business, Nagoya, Japan, June.
79. Huh, Dong Wook, Li Dai and Lorraine Eden. 2011. Leaders, Challengers and Institutional Voids. Presented at the annual meetings of the Academy of International Business, Nagoya, Japan, June.
80. Eden, Lorraine. 2011. MNEs, Taxes, Transfer Pricing and Sustainable Development. Invited Presentation at the AIB Fellows Plenary, Academy of International Business Annual Meetings, Nagoya, Japan, June 25.
81. Eden, Lorraine. 2011. Chair/presenter in the Plenary on "Strategic Alliances and International Business". Henley Business School International Business Conference, University of Reading, UK, April.
82. Eden, Lorraine. 2011. The Internalization Benefits of Transfer Price Manipulation. Invited Faculty Lecture at Henley Business School, University of Reading, UK, April.
83. Eden, Lorraine and Murphy Smith. 2011. The Ethics of Transfer Pricing. *Accounting, Organizations and Society* Workshop for Special Issue on "Fraud in Organizations", Imperial College, London, UK, April.
84. Dai, Li and Lorraine Eden. 2011. Stay or Go? A Vulnerability Perspective on Foreign Multinationals in War Zones. Presentation at the annual meetings of the International Studies Association, Montreal, Canada. March.
85. Dai, Li and Lorraine Eden. 2010. Caught in the Crossfire: The effect of interstate war on FDI by industry. Presented at the annual meetings of the Academy of Management, Montreal, Canada. August.
86. Eden, Lorraine. 2010, Participant/Chair. International Management Division, Professional Development Workshop on "The Liability of Foreignness of International Studies: Publishing in Premier Management Journals". Academy of Management Annual Meetings, Montreal. August.
87. Eden, Lorraine. 2010. Participant. Ethics in the Publication Process: Policy, Practice, and Consequences. All-Academy Theme Symposium. Academy of Management Annual Meetings. Montreal. August.
88. Eden, Lorraine. 2010. The Ethics of Publishing. Presentation at the joint Doctoral/Junior Faculty Consortia, International Management Division, Academy of Management Annual Meetings. Chicago. August.

89. Dai, Li and Lorraine Eden. 2010. Caught in the Crossfire: MNEs in Warring Host Countries. Presented at the Academy of International Business annual meetings, Rio de Janeiro, Brazil, June.
90. Eden, Lorraine. 2010. Co-chair (with Laszlo Tihanyi) annual JIBS Paper Development Workshop. Academy of International Business Meetings, Rio de Janeiro, Brazil, June.
91. Eden, Lorraine. 2010. The Ethics of Publishing. Presentation at the joint Doctoral/Junior Faculty Consortia, Academy of International Business Annual Meetings. Rio de Janeiro, June.
92. Eden, Lorraine. 2010. The Internalization Benefits of Transfer Price Manipulation. Invited presentation to faculty and PhD students in the Department of Economics at the University of Texas at Dallas, April.
93. Eden, Lorraine. 2010. Publishing International Business Research: Insights from a Journal Editor. Presentation to Business School Faculty at Prairie View Texas A&M University, Prairie View, Texas, March.
94. Eden, Lorraine. 2010. So You Want to Be a Journal Editor? Organized, chaired and presented at panel, International Studies Association Annual Convention, New Orleans. February.
95. Eden, Lorraine. 2010. Successful Publication Strategies: Meet the IPE Journal Editors. Organized, chaired and presented panel, International Studies Association Convention, New Orleans, February.

## **IX. RESEARCH FUNDING**

**Note: The “Research Funding” list starts with January 1, 2010; list of activities before 2010 available on request.**

- Emerita Professor in Business, Texas A&M University, 2018- August 2019. Replaced Gina and Anthony Bahr ‘91 Professorship in Business when moved to half-time status September 1, 2018.
- Gina and Anthony Bahr ‘91 Professorship in Business, Texas A&M University, 2015-2020. Bahr Professorship replaced Texas A&M Center for Executive Development Professorship in Business in 2015.
- Mays Research Faculty Fellowship, 2012-2015. Texas A&M University.
- Scowcroft Institute Faculty Research Grant, 2014 for project on “Foreign Subsidiaries in Conflict Zones”. \$2,500. Texas A&M University.
- Mays Summer Teaching Grant, summer 2011. Texas A&M University.
- Mays Research Faculty Fellowship, 2008-2011. Texas A&M University.
- Co-Principal Investigator (PI) on U.S. Department of Education Center for International Business Education (CIBER) Grant. Center for International Business Studies, 2014-2019. (Listed as a co-PI on CIBER grants going back to the mid-1990s.)

## **X. TEACHING AND EDUCATION**

*Note: The list of “Teaching and Education” activities starts with January 1, 2010; list of activities before 2010 available on request.*

### **Texas A&M University Fulltime Teaching (Mays Business School, 1995-2019)**

- International Transfer Pricing (masters, doctoral)
- Multinational Enterprises (masters, doctoral)
- International Environment of Business (undergraduate)
- International Business Policy (masters, honors)

### **Texas A&M University Guest Lectures**

- Guest lecturer. Law 689 International Transfer Pricing (Lead Instructor: Prof. William Byrnes), Texas A&M School of Law, Spring 2020 (six lectures, delivered over ZOOM).
  - The Comparable Uncontrolled Price Method
  - The Best Method Rule
  - Transfer Pricing in the Digital Economy
- Guest lecture on transfer pricing and tax avoidance in Prof. Kevin Roach’s graduate seminar ACCT 615, Contemporary Tax Topics (2012, 2013, 2014, and 2017).
- Guest lecture on transfer pricing in Prof. Matt Josefy’s stacked course ACCT 445/645, International Accounting (2012).
- Faculty presenter and moderator, MSC Wiley Lecture Series, “The Debates: Foreign Policy and the American Presidency” as part of the “Great Decisions Discussion Series”, October 22, 2012.
- Presentation (together with three of my students) to the External Advisory Board of the Center for International Business Studies (CIBS) on “Transfer Pricing Aggies”, October 2010.

### **Graduate Supervisions of Theses and Dissertations**

#### ***Texas A&M University - PhD Dissertation Chair***

- Dong Wook Huh (MGMT), “A Tale of Two Levels: Diversification of Business Groups”, 2011-2014.
- Li Dai (MGMT), “Caught in the Crossfire: Strategies of Multinationals in Host Countries at War”, 2009-2011.
- Xiaoming He (MGMT), “The State Multinational: The Impact of State Ownership on International Diversification and Firm Performance”, 2008- 2010.

#### ***Texas A&M University - PhD Dissertation Committee Member***

- Wendy Wang (Political Science) – graduated 2015.
- Ying Zhu (Marketing) – graduated 2011.
- Kelli Phelan (Educational Administration and Human Resource Development) - graduated 2010.
- Jie Kie (Educational Administration and Human Resource Development), graduated 2010.



- Kehan Xu (MGMT) – graduated 2010.

#### ***Other Universities -- PhD Dissertation Committee Member***

- Cathy Liu, Management, Indiana University (dissertation committee member, 2017-2019). Dissertation defended May 2019.
- Everlyne Misati, International Business, Florida International University (dissertation committee member, Fall 2016-present). Defense expected 2020.
- George Salis, Thomas Jefferson School of Law, San Diego State University (dissertation committee member, Spring 2017-present).

#### **Executive Education and Training**

- Executive Training on Global Business Strategy, Halliburton executives (BLD III program), Texas A&M University, Center for Executive Development, various years.
- Mays Business School EMBA Capstone Projects: Ahmed Mousbah 2013, Chester Lopez 2012.
- MGMT 663 “International Transfer Pricing” at Texas A&M is an approved course for Paper 3, “Transfer Pricing”, in the Chartered Institute of Taxation (COIT)’s Advanced Diploma in International Taxation (ADIT). <http://www.tax.org.uk/adit><http://www.tax.org.uk/adit>.

#### **Publications with Teaching/Instruction Focus**

- 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 Spanish. Forthcoming in Chinese.
- The Ethicist: Ethics blog for the Academy of Management, 2012-2015.
- Eden, Lorraine. 2011. Launching a career in transfer pricing. *Transfer Pricing International Journal*, October: 26-30.
- Eden, Lorraine, Li Dai and Dan Li. 2010-2011. International Business, International Management, International Strategy: What’s in a Name? *International Studies of Management & Organization*, 40(4): 54-68.
  - To be reprinted in *The Routledge Companion to International Management Education*, edited by Denise Tsang, forthcoming with Routledge.
- Eden, Lorraine. 2010. Letter from the Editor-in-Chief: JIBS Publication Criteria and their Consequences. *Journal of International Business Studies*, 41.7: 1093-1098.
- Eden, Lorraine. 2010. Letter from the Editor-in-Chief: Scientists behaving badly. *Journal of International Business Studies*, 41.4: 561-566.

## **Teaching Related Grants and Databases**

Several firms have granted access to their software programs for education and research purposes by myself and my students in my course MGMT/INTA/ECON 663 Transfer Pricing.

- Standard & Poors. Capital IQ (with IRS Template Overlays). Free access for teaching and research purposes. Contract signed 2017. Ongoing. <https://marketintelligence.spglobal.com/>
- Bureau van Dijk. Transfer Pricing Catalyst. Free access for teaching and research purposes. Contract signed 2016. Ongoing. <http://www.bvdinfo.com/en-gb/our-products/bvd-s-catalysts-solutions-by-task/catalysts-solutions-by-task/tp-catalyst>
- Thomson Reuters Transfer Pricing OneSource Documenter. Free access for teaching and research purposes. Contract signed 2011. Ongoing. <http://onesource.thomsonreuters.com/solutions/transfer-pricing/transfer-pricing/>
- ktMINE Royalty Rate Finder. Free access for teaching and research purposes. Contract signed 2011. Ongoing. <http://www.ktmine.com/solutions-new/royalty-and-market-rate-intelligence/>
- ktMINE Licensing Agreement Analyzer. Free access for teaching and research purposes. Contract signed 2013. Ongoing. <http://www.ktmine.com/solutions-new/licensing-intelligence/>

## **Panelist/Presenter/Faculty at Doctoral and Junior Faculty Consortia \***

- 2020 Co-organizer/presenter with Denis Arnold at two ethics workshops for PhD students and junior faculty at the Academy of International Business annual meetings, Miami, July.
- 2019 Co-organizer/presenter with Denis Arnold at two ethics workshops for PhD students and junior faculty at the Academy of International Business annual meetings, Copenhagen, June.
- 2018 Organized and ran “Ethical Dilemmas in the Academy” workshop at the AIB Southeast Chapter Meetings, Nashville, TN. November.
- 2018 Co-organizer and co-presenter with Kathy Lund Dean and Paul Vaaler of an All-Academy PDW on “Ethics in the Academy” at the Academy of Management annual conference, Chicago. August.
- 2018 Participated in a Professional Development Workshop on “Theory Development in International Management”, International Management Division, Academy of Management conference, Chicago, August.
- 2018 Co-organizer/presenter with Rosalie Tung of ethics workshop for PhD students and junior faculty at the Academy of International Business annual meetings, Minneapolis, June.
- 2017 Participated in a “Meet the Editors” panel at the Academy of International Business Southeast Chapter Annual Meetings, Washington, DC, October, as a Consulting Editor for the *Journal of International Business Policy (JIBP)*.
- 2017 Organized and taught an “Ethics in Research” Workshop at the Academy of International Business Southeast Chapter Annual Meetings, Washington, DC, October.
- 2017 Faculty presenter on Research Ethics and PhD Students, Doctoral Consortium, Academy of International Business annual meetings. Dubai, July.
- 2016 Mid-Career Faculty Consortium, Academy of Management annual meetings, Anaheim, August.
- 2015 Keynote speaker on “Ethics and PhD Students”, Junior doctoral consortium, International Management Division, Academy of Management meetings in Vancouver, August.

- 2014 Faculty participant/presenter in the Junior Faculty Consortium, International Management Division, Academy of Management, August.
- 2014 Spoke (via SKYPE) to Professor Jean Bartunek’s doctoral seminar at Boston College about ethics in research, March.
- 2013 Faculty participant/presenter at the Doctoral Consortium of the Academy of International Business, Istanbul, Turkey, June.
- 2012 Faculty presenter, Ethics Education Committee presentation on “ethics in research”, International Management Division Doctoral Consortium, Academy of Management meetings, Boston, MA, August.
- 2011 Academy of Management Videos on Ethics in Research, I was one of eight journal editors interviewed for a series on ethics, available on YouTube:  
<http://www.youtube.com/playlist?list=PL65B059BC12E75502>
- 2011 Faculty participant/presenter at the Doctoral Consortium, Academy of International Business meetings, Nagoya, Japan, June.
- 2011 Faculty participant/presenter at the International Management Division Junior Faculty Consortium, Academy of Management meetings, San Antonio, TX, August.
- 2011 Faculty presenter, Ethics Education Committee presentation on “ethics in research” to the International Management Division Doctoral Consortium, Academy of Management annual meetings San Antonio, TX, August.
- 2011 Presenter in the Roundtable Panel: The WAIB 10th Anniversary Panel: Perspectives from Women at Different Points in their Careers, Academy of International Business Annual meetings, Nagoya, Japan, June.
- 2010 Co-chair with Laszlo Tihanyi, JIBS Paper Development Workshop, Academy of International Business Meetings, Rio de Janeiro, Brazil, June.
- 2010 Participant, Ethics in the Publication Process: Policy, Practice, and Consequences, All-Academy Theme Symposium, Academy of Management Annual Meetings, Montreal, August.
- 2010 Publishing International Business Research: Insights from a Journal Editor, Presentation to Business School Faculty at Prairie View Texas A&M University, Prairie View, TX. March.
- 2010 So You Want to Be a Journal Editor? Organized, chaired and presented at panel, International Studies Association Annual Convention, New Orleans, February.
- 2010 Successful Publication Strategies: Meet the IPE Journal Editors, Organized, chaired and presented at panel, International Studies Association Annual Convention, New Orleans, LA, February.
- 2010 The Ethics of Publishing, Presentation at the joint Doctoral/Junior Faculty Consortia, Academy of International Business Annual Meetings, Rio de Janeiro, June.

## **XI. EXTERNAL SERVICE**

*Note: With a few exceptions, all “External Service” items start with January 1, 2010; a detailed list of service activities before 2010 available on request.*

### **Offices in Learned Societies and Professional Associations**

#### *Academy of International Business*

- AIB Executive Board 2016-2019
  - President-Elect (August 2016-July 2017), President (August 2017-July 2018) and Immediate Past President (August 2018-July 2019).
  - Major responsibilities as AIB Immediate Past President in 2018-2019:
    - Responsible for overseeing implementation of the new AIB ethics codes,

- committees and activities.
  - Responsible for overseeing completion and presentation of the AIB History Project.
  - Responsible for overseeing AIB's Shared Interest Groups (SIGs): WAIB, Research Methods and (new) Teaching.
  - Executive Board member and member of various Board committees (Governance, Publications, Shared Interest Groups).
- Major accomplishments as AIB President in 2017-2018:
  - Code of Ethics for AIB Members (wrote code of ethics that was vetted by all stakeholders and adopted by the AIB Executive Board in June 2018); established AIB's first Ethics Policy Committee and Ethics Review Committee; and handled a major ethical violation case.
  - Committee member – developed Mission, Vision and Values Statements for AIB (adopted by AIB Board June 2018).
  - Wrote Shared Interest Groups Policy (adopted by Board June 2018).
  - Hosted AIB's 60<sup>th</sup> Anniversary at the Minneapolis Annual Meetings including moderating a Town Hall of AIB's Past Presidents.
  - Set up AIB History Project and established AIB Historian and Deputy Historian Positions, worked with historians and AIB Secretariat to collect and make available AIB's history as multi-media project.
  - Selection of AIB Insights Editor.
  - Co-organizer Academic Day, World Investment Forum, Geneva, October 2018.
- AIB Fellows
  - Dean of the AIB Fellows, 7/2020-7/2023
  - Member of the Selection Committee for the Educator of the Year Award, 2014.
  - Member of the Selection Committee for the Executive of the Year Award, 2014.
- AIB Ad-Hoc and Standing Committees
  - Selection Committee for open positions on the AIB Executive Board–2019-2021. Committee of three Past Presidents of AIB, meets annually to prepare election slate for AIB Executive Board) – member 2018-2020, chair 2021.
  - Advisory on Governance/Ethics Issues – updating AIB codes of ethics, establishing governance procedures, 2019-present.
  - Chair, AIB Presidential Committee to develop a Code of Ethics for the Academy of International Business, 2010-2011. Developed a Professional Code of Ethics for the association that was adopted by the AIB Executive Board in February 2011.
  - Member of a four-person AIB Presidential Committee that reviewed the publications and publication strategy of the Academy of International Business. Our committee proposed several new directions for the Association. 2010-2011.
- AIB Journals
  - Editor-in-Chief, *Journal of International Business Studies*, 2008-2010 (handling manuscripts from July 1, 2007 through December 31, 2010).
  - Consulting Editor Board, *Journal of International Business Studies*.
  - Consulting Editor Board, *Journal of International Business Policy*, 2017-present.
- WAIB (Women in the Academy of International Business)
  - Founder, first president and ex officio board member 2001-present.

***Academy of Management***

- Coordinator and writer for THE ETHICIST blog, a Strategic Doing Initiative of the Academy of Management, 2011-2015.
- Member, Ethics Education Committee, 2010-2016.

### **Journal Editorial Roles**

#### ***Editor-in-Chief***

- Editor-in-Chief, *Journal of International Business Studies*. Selected Nov. 2007. Responsible for move to Manuscript Central Jan.-June 2008. Handled manuscripts July 2008-Dec. 2010.)

#### ***Guest Editor of Journal Special Issue (see also under “Publications for earlier Special Issues)***

- Guest Co-Editor (with Susan Forquer Gupta, Amanda Bullough, Fiona Moore and Tugba Kalafatogul), Special Issue on “Gender in International Business and Management”, *Cross-Cultural and Strategic Management*. 2015-2017.

#### ***Consulting Editor***

- *Journal of International Business Studies*, 2013-present.
- *Cross-Cultural and Strategic Management: An International Journal*, 2015-present.
- *Journal of International Business Policy*, 2017-present.

#### ***External Advisory Board Member***

- *Transnational Corporations*, 2018-present.

#### ***Editorial Review Board Member***

- *Academy of Management Review*, 2017-present.
- *Critical Perspectives on International Business*, 2003-2016.
- *Journal of International Management*, 1999-2016.
- *Journal of World Business*, 2006-2016.
- *Management International Review*, 2005-2015.
- *Transnational Corporations*, 2018-present.

#### ***Ad Hoc External Reviewer for Research Councils and Government Organizations***

- Research Grants Council of Hong Kong
- Canada Social Sciences and Humanities Research Council
- National Science Foundation
- World Bank

### **Member of Organizational Advisory Boards**

- Member, International Scientific Committee, Rennes School of Business, Rennes, CEDEX, France.

- Member of the Global Advisory Board. Wong Center for the Study of Multinational Corporations, 2013-present. <http://www.mnccenter.org>
- Member of the Advisory Board. *E-Bright* learning platform (online transfer pricing course, Transfer Pricing Associates), 2013-present. <http://www.e-bright.com/editorial-board>.

### **Honor Societies**

- U.S. Fulbright Association
  - Canada-US Fulbright 1992-1993 and lifetime member 1993-present
  - Founding member of the Brazos Valley Chapter, 2003-present
- Phi Beta Delta (Honor Society for International Scholars)
- Beta Gamma Sigma (Honor Society for AACSB Accredited Business Programs)
- International Gold Key Society, honorary member.

### **Member of Professional Associations**

- Academy of International Business (AIB)
- Academy of Management (AOM)
- American Bar Association (ABA), Tax Division
- International Fiscal Association (IFA), US Branch
- International Studies Association (ISA)
- National Association of Business Economists (NABE)
- Strategic Management Society (SMS).

### **Significant Service Activities before 2010**

#### ***Academy of International Business***

- 2006 Co-chair, Back & Forth Committee, Fellows of the Academy of International Business, 2006-2007.
- 2001 Founder, Women in the Academy of International Business (WAIB), 2001-2003; Past President 2003-2005, Executive Board member (ex officio): 2005-present.
- 2000 Vice President and Program Chair, Academy of International Business, 2000-2002.

#### ***Academy of Management***

- 2005 Organizer and Chair, Junior Faculty Consortium, International Management Division, Academy of Management annual meetings, Hawaii, 2005.
- 2002 Chair, Ad Hoc Committee on International Diversity, Academy of Management, 2002-2004.

#### ***Bryan Rotary Club***

- 2006 Rotary International Paul Harris Fellow. Bryan Rotary Club, 2006.

#### ***Canadian Economics Association***

- 1990-91 Vice-President, Canadian Economics Association, 1990-1991.

1990-93 Founding Coordinator of the Women Economists Network (WEN) 1990-1991; President 1991-1992; Past President 1992-1993.

#### ***International Studies Association***

1995-97 Co-founder and first secretary, Active Learning in International Affairs (ALIAS), International Studies Association, 1995-1997.  
1994-97 President, International Political Economy (IPE) Section, International Studies Association, 1994-96; Program Chair 1994-1995. Vice-President 1992-1994. Past President 1996-1997.

#### ***International Trade and Finance Association***

1996 Board of Directors, International Trade and Finance Association, 1996-1998.

## **XII. INTERNAL SERVICE**

***Note: With a few exceptions, the items listed under “Internal Service” start with January 1, 2010; a list of activities before 2010 available on request.***

### **Mays Business School**

- Wharton Data Research Services (WRDS) Representative, Mays Business School, 2005-present.
- Co-Principal Investigator (PI) on U.S. Department of Education Center for International Business Education (CIBER) Grant. Center for International Business Studies, 2014-2019. (Co-PI on CIBER grants dating back to mid-1990s).
- Member of the following Mays centers and programs: Center for International Business Studies (CIBS), Center for International Business Education and Research (CIBER), Center for Human Resource Management (CHRM), fall 1995-present.
- Member, International Business Policy Committee, College of Business Administration, 1995-2016.
- Mays Data Committee –Member, 2011-2012; Chair, 2014-2016.
- Member, Mays Technology and Facilities Review Committee 2009-2012, 2014-2016.
- Member, Faculty Search Committee for a Junior Strategy Hire, Management Department, 2015-2016.
- Member, Faculty Search Committee for a Senior Hire in the Management Department, 2010-2011.
- Member, Mays Online Learning Committee, 2010-2012.

### **University Level**

- University Disciplinary Appeals Committee, member - 2003-2006; 2006-2009; 2010-2013. (Last level of appeals process for violations of the Aggie Honor Code at Texas A&M).
- International Programs Committee, Faculty Senate. Mays Business School representative 2012-2013.
- Association of Former Students (AFS) Research Awards Committee, 2010.

### **Significant Service Activities before 2010**

- 1995 Associate Director, Center for the Study of Western Hemispheric Trade, Texas A&M University, 1995-97.

### XIII. CONSULTANCIES & CONTRACT RESEARCH

#### Consultant/Advisor to Governments and International Governmental Organizations

- ***United Nations Conference on Trade and Development (UNCTAD)***
  - Member, Selection Committee for the UNCTAD-AIB Doctoral Student Awards, 2020.
  - Serve as expert consultant to UNCTAD’s annual *World Investment Report*. Written short sections of the report and served as expert evaluator at UNCTAD brainstorming sessions.
  - Member of the Organizing Committee for the Multi-Disciplinary Academic Conference at the World Investment Forum. UNCTAD. Geneva, CH. October 2018.
  - External Advisory Board, *Transnational Corporations Journal*, UNCTAD, 2018-present.
  - Experts Group on “Modernizing the World Investment Report”, September 2017 - ongoing.
  - Experts Meeting. Global Seminar on the 2015 World Investment Report on “Taxation, FDI and Developing Countries”, Geneva, Switzerland, November 2014.
  - Testified before the United Nations, Geneva, Switzerland, January 2013. UNCTAD Multi-year Expert Meeting on "Regional integration and foreign direct investment in developing and transition economies", Geneva, Switzerland on January 28-30, 2013, on the subject of “new research directions on multinationals, foreign investment and developing countries”. <http://unctad.org/en/pages/MeetingDetails.aspx?meetingid=202>.
  - “Taxes, Foreign Direct Investment and Developing Countries”, 2011-2013. Wrote the scoping document for the theme of the 2015 *World Investment Report*.
  - FDI and Gender Research Seminar, Geneva, Switzerland, April 2013.
  - Experts Meeting. Global Seminar on the 2013 World Investment Report, Geneva, Switzerland, April 2013.
  - Experts Meeting. Global Seminar on the 2013 World Investment Report, Geneva, Switzerland, January 2013.
  - Experts Meeting. Brainstorming session for the 2012 World Investment Report, Geneva, Switzerland, October 2011.
- ***International Bureau for Fiscal Documentation (IBFD)***
  - External reviewer and wrote the introductory chapter for *Transfer Pricing and Intra-Group Financing*, edited by Anuschka Bakker and Marc M. Levey. Amsterdam, IBFD. 2012.
- ***International Monetary Fund (IMF)***
  - Wrote chapter on “Transfer Pricing” with Bill Alterman and Erwin Diewert for the IMF *Manual on Export and Import Prices*, 2009.



- ***U.S. 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. Developed new methodologies for statistical agencies to use in collecting transfer prices for international price indexes. 2000-2005.
  
- ***The World Bank/International Bank for Reconstruction and Development (IBRD)***
  - Expert reviewer in 2016 of Guj, Pietro; Martin, Stephanie; Maybee, Bryan; Cawood, Frederick Thomas; Bocoum, Boubacar; Gosai, Nishana; Huibregtse, Steef. *Transfer Pricing in Mining with a Focus on Africa: A reference guide for practitioners*. Washington, D.C.: World Bank Group, 2017.
  - Participant in “Transfer Pricing and Illicit Flows to Developing Countries” Project, 2009-2010. Wrote report and presented report at World Bank conference. Later published as book chapter in *Draining Development*.  
<https://openknowledge.worldbank.org/handle/10986/2242>
  
- ***Other Government and Non-Governmental Agencies***
  - Member of the E15 Task Force on Trade and Investment, an expert task force in the E15 Initiative on Strengthening the Global Trade System, convened by the World Economic Forum and the International Commission on Trade and Sustainable Development in Geneva. Prepared policy recommendations for the 10th Ministerial Conference of the World Trade Organization, December 2015 and January 2016 Meeting of the World Economic Forum, 2015-2016.
  - Projects in Canada on international trade and foreign direct investment public policy analysis for Industry Canada, C.D. Howe Institute, Department of Foreign Affairs & International Trade (DFAIT) Canada, Institute for Research on Public Policy. Various years.

### **Executive Training**

- Executive Training on Global Business Strategy, Halliburton executives (BLD III program), Texas A&M University, Center for Executive Development, various years.
- International Prices Division, Bureau of Labor Statistics, US Department of Labor. Transfer pricing training of BLS field economists, Washington, DC, 2005.
- Revenue Canada/Canada Revenue Agency. Two and five day executive training courses for Revenue Canada on transfer pricing in North America and the OECD. Over a dozen courses between 1990 and 2003 taught in multiple locations across Canada. Approved as an in-house training expert on transfer pricing for Revenue Canada/Canada Revenue Agency.

## Expert Consultant and Witness Experience

- Since the early 1990s, I have been retained on a part-time basis as an expert consultant on transfer pricing matters and controversy, either retained directly by the client or working with a team of experts. Only two of these engagements have proceeded to trial (see below). Most but not all of my work since 2009 has been as an affiliated Expert with the **Analysis Group**.  
<https://www.analysisgroup.com/experts-and-consultants/affiliated-experts/lorraine-eden/>
- In these engagements, I have provided advice to both private and public sector clients on transfer pricing and international tax issues and disputes in a wide variety of areas including: transfer pricing of production and marketing intangibles, bankruptcy proceeds of high-tech multinationals, cost sharing arrangements, advance pricing agreements, intellectual property licensing and alliances, US possessions corporations, patent damages, offshore call centers, and transfer pricing of digital business models and activities.
- I have provided expert testimony before Courts, Governments, and International Organizations:
  - Expert testimony before Tax and Bankruptcy Courts
    - *Coca-Cola Co. v. Commissioner*, U.S. Tax Court, No. 31183-15, filed 12/14/15. [Filed both Expert and Rebuttal Reports. Testified in Deposition, 2017].
    - *In re Nortel Networks Inc.*, U.S. Bankruptcy Court, Delaware, No. 09-10138 (KG), filed 1/14/09. [Filed both Expert and Rebuttal Reports. Testified both in Deposition and in Court, 2014. Trial held simultaneously over closed-circuit TV in U.S. Bankruptcy Court in Wilmington, Delaware and the Ontario Superior Court of Justice in Toronto, Canada.]
  - Expert testimony before Governments and International Organizations
    - United Nations, Geneva, Switzerland, January 2013, at the UNCTAD Multi-year Expert Meeting on "Regional integration and foreign direct investment in developing and transition economies", Geneva, Switzerland on the subject of "new research directions on multinationals, foreign investment and developing countries".  
<http://unctad.org/en/pages/MeetingDetails.aspx?meetingid=202>.
    - 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.