

by David K.Eiteman and Arthur I. Stonehill

F276.7 E85



95

## MULTINATIONAL BUSINESS FINANCE

DAVID K. EITEMAN

University of California Los Angeles

ARTHUR I. STONEHILL

Oregon State University





ADDISON-WESLEY PUBLISHING COMPANY

Reading, Massachusetts

Menlo Park, California · London · Amsterdam · Don Mills, Ontario · Sydney

Copyright © 1973 by Addison-Wesley Publishing Company, Inc. Philippines copyright 1973 by Addison-Wesley Publishing Company, Inc.

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise, without the prior written permission of the publisher. Printed in the United states of America. Published simultaneously in Canada. Library of Congress Catalog Card No. 72–9314.

## MULTINATIONAL BUSINESS FINANCE

The world has entered an unprecedented era of unified global economic activity, with worldwide financing, production, and distribution dominated by a new and innovative form of business organization, the multinational corporation. Development of the multinational corporation is perhaps the most important business event of the past two decades, and continued evolution of this form of organization for expanded world economic affairs will very likely be the major business thrust of the remainder of this century.

Multinational Business Finance is concerned with developing financial managerial knowledge and skills for those persons who are or who will be charged with responsibility for making financial decisions within such global enterprises.

An underlying assumption of the book is that the finance function in a multinational enterprise differs from its counterpart in a uninational enterprise, perhaps to an even greater extent than do such other business functions as the management of marketing, production, research and development, and labor relations. These other functions must inevitably be carried out in a manner which gives dominant consideration to host-country customs and traditions.

Financial management is different. Many of the most important decisions within the financial management of a multinational enterprise have no domestic counterpart whatsoever, and arise solely because funds are in the process of being transferred over national borders and from one economy and currency system to another. There is no counterpart in the domestic business of any country for payment of dividends in another currency, for the need to shelter normal working capital from the ravages of devaluation, or for many of the considerations which impinge upon choices between owning versus licensing. The fact of being multinational creates new decision areas and opens the imagination to new techniques that did not exist before.

The force of these new possibilities is very powerful, both for corporate activity and for the economies of the many countries of the world. The financial manager who must orchestrate and conduct the entire panorama of financial flows in a worldwide venture is embarking on a new sphere of managerial activity. It is the hope of the authors that this book will help bring some order and structure to this new field of managing financial decisions within multinational business enterprises.

- 27

Multinational Business Finance is intended for college and university courses in financial management or international business at both the graduate and junior-senior level. It would also be appropriate for use in management-development programs or institutes in the U.S. and abroad. A level of background knowledge or experience equivalent to a basic business finance course, using a text such as J. Fred Weston and Eugene F. Brigham, Essentials of Managerial Finance, second edition (New York: Holt, Rinehart, and Winston, 1971) or James C. Van Horne, Fundamentals of Financial Management (Englewood Cliffs, N.J.: Prentice-Hall, 1971) is presumed. A previous course in international economics would be desirable, but the text has been designed to cover sufficient economic material so that separate background is not essential. The book might in fact be used as a supplement to courses in international economics or international finance as they are currently taught in departments of economics.

A course designed around *Multinational Business Finance* might be oriented toward further consideration of the conceptual problems of multinational business, or it might be directed toward increased professional expertise for those who are or who will become multinational financial executives. For this reason, a carefully selected list of cases, complete with short summaries, is included as an appendix. These cases are listed by chapter groupings to which they apply, and can be ordered from the Intercollegiate Case Clearinghouse, Soldiers Field Post Office, Boston, Massachusetts 02163.

Each chapter is followed by a list of selected readings. For a more complete set of readings, see: Gunter Dufey, *Financial Management in the International Corporation: An Annotated Bibliography* (Ann Arbor, Mich.: Graduate School of Business Administration, University of Michigan, 1971). For a continuing review of all international business literature, see John and Ruth Fayerweather, editors, *The International Executive*, published quarterly at 64 Ferndale Drive, Hastings-on-Hudson, New York 10706, U.S.A.

The authors are grateful to the many persons who contributed suggestions for improvement of the original manuscript. Professor Gunter Dufey of the University of Michigan provided very valuable comments on almost every section of the manuscript. Valuable ideas were also supplied by Professor Richard D. Robinson of M.I.T., Dr. Joseph O. Vogel of the Ford Motor Company, Professor J. Frederick Truitt of the University of Washington, Professor Lee C. Nehrt of Indiana University, and Professor Bart W. Sorge of the University of Southern California. Business executives, both American and foreign, who visited the campuses of the University of California, Los Angeles, and Oregon State University, contributed their share of ideas. The authors' opportunities to teach, do research, and consult with business executives in Norway, Argentina, and Peru provided many stimulating thoughts which inevitably insinuated themselves into the fabric of the book. As in all

such ventures, however, the final results remain the responsibility of the authors.

Finally we would like to thank our wives, Nobuko and Kari, for their patience and encouragement through the three years it took to write this book.

Pacific Palisades, California Corvallis, Oregon August 1972

D.K.E. A.I.S.

### **CONTENTS**

#### PART 1 INTRODUCTION

V		
CHAPTER 1	THE SCOPE OF MULTINATIONAL BUSINESS FINAN	CE
	Unique Attributes of Multinational Business Finance	4
	Scope of the Book	5
	The international monetary environment	5
	Institutional factors	6
	The foreign investment decision	6 7
	Risk reduction on a multinational level	7
	Relative Size and Importance of Multinational Business	8
	International investment position of the U.S	8
	Direct foreign investment in dollar terms	9
	Profitability of foreign operations	11
	worldwide operations	13
	U.S. exports to foreign affiliates of U.S. firms  Foreign direct investment in the U.S.	18 18
· V	PART 2 INTERNATIONAL MONETARY ENVIRONME	ENT
CHAPTER 2	THE INTERNATIONAL MONETARY SYSTEM	
	The Need to Understand It	25
	History of the International Monetary System	26
	Gold standard	26
	Fluctuating exchange rates	26
	Gold exchange standards of today	27 28
	Modification of the gold exchange standard	
	The Foreign Exchange Market	33
	Functions of the foreign exchange market	33 34
	Organization of the foreign exchange market Spot and forward exchange rates	34
	Arbitrage	36

	The Balance of Payments
	Introduction
	Definitions
	The U.S. balance of payments 40
	Possible Impact of Changes in the International Monetary System on Multinational Business
	Unified capital markets
	Financial reporting
	Hedging
CHAPTER 3	PUBLIC POLICY CONSTRAINTS
	Multinational Business and National Sovereignty 48
	Economic Constraints
	3 1
	Fiscal policy 51 Balance-of-payments policy 51
	Economic protectionism
	Economic development policies
	Non-Economic Constraints
	Economic imperialism 60
	National security 61
	Socialism
	Religious and cultural heritage 62
	Political expediency
	PART 3 INSTITUTIONAL FACTORS IN MULTINATIONAL BUSINESS FINANCE
CHAPTER 4	INTERNAL SOURCES OF FUNDS
	Sources of Funds for U.SOwned Foreign Affiliates 69
	Sources of Funds Within the Corporate Family 73
	Funds derived directly from U.S. parent 73
	Funds generated internally
	Funds from sister subsidiaries
	Borrowing with parent guarantee
J	Bollowing with parone guarantee
CHAPTER 5	EXTERNAL SOURCES OF FUNDS .
	Commercial Banks
	Selecting a bank
	Calculating interest charges
	Range of services
	Concepts of doing business
	Edge Act and Agreement Cornerations

	Origin
	Types of activities
	International banking
	Holding companies
	Investment in nonbanking operations 89
	Governmental Help in Financing International
	Business 90 Export-import bank 93
	Export-import bank
	The Cooley loan program
	Eurodollars94
	Creation of Eurodollars
	Historical development of the Eurodollar market 100
	Short-term and medium-term Eurodollar loans 101
	Asia currency unit
	Foreign Finance Subsidiaries
	World Bank Group
	World Bank
	International Development Association 109
	International Finance Corporation
	Development Banks
	Inter-American Development Bank
	Nacional Financiera, S. A
	ADELA 116
/	
CHAPTER 6	IMPORT AND EXPORT FINANCING
	<b>The Draft</b>
	Parties to a draft
	Types of drafts
	Bill of Lading
	Characteristics of the bill of lading 126
	Variations in the bill of lading
	Letter of Credit
	Types of letters of credit
	Liabilities of banks under letters of credit
	Checkpoints in examining a letter of credit
	Additional Documents
	Documentation in Typical International Transaction
	127
	Export Credit Insturance

Contents

xi

	Export Credit Insurance in the United States	138
	Appendix: Commercial Abbreviations	141
CHAPTER 7	TAXATION OF MULTINATIONAL BUSINESS	
	Tax Planning	145
	National Tax Environments	146
	The role of corporate income taxes	146
	Value-added tax	147
	Other national taxes	150
	Tax-haven subsidiaries  Tax morality and diplomacy	150 152
	U.S. Taxation of Foreign Operations	152
	Meaning of foreign corporation	152
	When income from foreign operations is taxed	152
	Dividends-received deduction	154
	Consolidated U.S. returns	154
	Controlled Foreign Corporations	154
	Foreign Tax Credit	160
	Purpose of credit	160
	Who can claim credit	160
	Creditable taxes	160
	Computing the direct foreign tax credit	161 162
	The deemed-paid or indirect foreign tax credit  Dividends received from less developed countries	163
	Deemed credit for second- and third-tier subsidiaries	165
	Limitation on amount of credit	165
	Effect of foreign tax credit system	167
	Liquidation of Controlled Foreign Corporations	168
	Capital-gains treatment before 1962	168
	Sales, exchanges and liquidations after 1962	168
	Exceptions and exclusions	168
	Special Corporations	169
	U.S. tax incentives	169
	Western Hemisphere Trade Corporation	169
	Possessions Corporation	171 172
	Domestic International Sales Corporation (DISC) Export Trade Corporation	176
	Less Developed Country Corporation	177
	Effect of Tax Treaties	179
	Purpose of treaties	179
	General pattern of treaties	179
	Exemption for certain industrial profits	179
	Reduced withholding taxes	180
	Other treaty provisions	180

	Conten	ts	xiii
	Planning the Structure		181
	Branch or foreign subsidiary		181
	Less Developed Countries		182
	Tax Treaties		183
	Tax Theory		183
	PART 4 FINANCIAL DECISION MAKING IN MULTINATIONAL FIRMS		
CHAPTER 8	THE FOREIGN INVESTMENT DECISION		
	Motives for Foreign Investments		
	Economic rationale		189 192
	The Investigation Process		195
	The Evaluation Process		197
	Are financial criteria relevant?		197
	Financial rates of return		198 200
			206
	Uncertainty Absorption		200
CHAPTER 9	COST OF CAPITAL AND FINANCIAL STRUCTU	RE	
	The Problem of Measuring the Cost of Capital		211
	Definition of Cost of Capital		211
	Cost of Debt		212
	Cost and availability of funds		212
	Reasons for borrowing abroad		213
	Cost of Equity		213 213
	Cost and availability of equity funds		213
	Risk		218
$\sqrt{}$	Optimal Financial Structure		220
CHAPTER 10	ADAPTING TO POLITICAL INTERFERENCE		
	Historical View		228
	Causes of conflict		228 228
	Forms of host-government interference		231
	Forecasting Political Interference		236
	Techniques for Dealing with Political Risks		236
	The need for protective measures		230

	Negotiating the environment prior to foreign	
	investment	237 242
	Compensation strategies after expropriation or	242
	nationalization has occurred	248
	Determination of the appropriate amount of compensation	
	in an expropriation	252
CHAPTER 11	RISK OF FOREIGN EXCHANGE LOSS	
	Changes in Currency Values	260
	Forecasting Devaluations	262
	The economics of devaluation	263
	The politics of devaluation	267
	Responses to Anticipated Devaluations	268
	Use of forward exchange market	269
	Foreign currency swaps	270
	Arbi-loans	271
	Covered-interest arbitrage	272
	Credit swaps Other responses to anticipated devaluation	272 279
	Reserves against foreign exchange losses	283
	Decision Models	283
		283
	The Shulman model	285
	The Shapiro model	286
	***	
CHAPTER 12	MANAGEMENT OF WORKING CAPITAL	
	The Technique of Multinational Working Capital	200
	Management	289
	Monetary balance	289
	Leads and lags—the timing of intracompany fund transfers	290
	transfers Transfer pricing Transfer pricing	291
	Borrowing at lowest cost	292
	Handling Cash Balances	292
	Allocating cash balances	294
	Existence of local exchange restrictions	295
	Value loss through inflation and/or devaluation	296
	Availability of money-market instruments	297 297
	Centralized depositories	298
	Techniques of transfer  A management-science approach	299
	Receivables	300
	Meterianies	_ 50

	Sales to independent customers Intracorporate family receivables Inventories	300 302 303
	Pricing Under Inflation	304
	Illustration of inflation impact  Tax impact on price adjustment	304 306
	Fund Remittances from Abroad	307
	Theory of fund remittances Unique attributes of fund remittances Factors influencing actual remittance policies	308 308 309
V	PART 5 ACCOUNTING, REPORTING, AND CONTRO	)L
CHAPTER 13	ACCOUNTING AND REPORTING	
	Foreign Accounting Systems	316
	A macroeconomic framework A microeconomic framework An independent-discipline approach Uniform accounting systems	316 316 317 317
	Consolidations of Accounts	318
	Creditors of various subsidiary corporations Creditors of the parent corporation Outside stockholders of subsidiary corporations Stockholders of the parent corporation Management of the parent company	319 319 320 320 321
	Translation of Foreign Currency Accounts—Rules Asset side of the balance sheet Liability side of the balance sheet Income statement	322 323 323 325
	Translation of Foreign Currency Accounts—	225
	Examples  Local currency devaluation; no operations  Local currency devaluation; with operations  Inventory translation problems	325 325 328 330
	Evaluation of Operations Under Inflation	332
	Assets which become expenses	333 334 335
	International Financial Reporting	336
	The format for presenting accounting information  Degree of disclosure  Auditing abroad	336 338 339

Contents

XV

#### xvi Contents

#### CHAPTER 14 CONTROL

Organizing for International Financial Management	343
The problem	343
The international finance specialist	344
Organization structure	350
Corporate responsibility for certain key financial decisions	355
The role of the financial manager of foreign	357
subsidiaries	
Evaluation of Performance	
Transfer Pricing	362
Taxation	362
Tariff	364
Managerial incentive and evaluation	364
Anti-trust	364
Risk	365
Bargaining power	366
	366
Joint ventures	500
Transfer-pricing policies of multinational corporations	367
Appendix: Cases Appropriate for Use with Text	372
Index	387

# PART 1 INTRODUCTION