

## **OPINION**

**by Marin Ivanov Galabov, Professor at the University of National and World Economy, PhD**

of a dissertation for awarding the educational and scientific degree of "**Doctor**"

in the Field of Higher Education 3. Social, Economic and Legal Sciences

Professional field 3.8. Economics

**Author:** Kiril Angelov

**Topic:** Optimization and Control of Transactions Between Related Parties in the Context of Transfer Pricing.

### **1. General description of the materials presented**

By order No. 145 of 02.04. 2026 of the Rector of the University of Insurance and Finance, Corresponding Member Prof. Dr. Boris Velchev, I am appointed as a member of the scientific jury for ensuring a procedure for the defense of a dissertation on the topic of "Optimization and Control of Transactions Between Related Parties in the Context of Transfer Pricing" for the acquisition of the educational and scientific degree of "Doctor" in Field of higher education 3. Social, economic and legal sciences, Professional field 3.8. Economics. The author of the dissertation is Kiril Angelov – a PhD candidate at the Department of Accounting and Auditing at the University of Insurance and Auditing - Sofia.

In connection with the procedure, the candidate has submitted a dissertation, abstract, CV, information on scientific publications, contributions, and the fulfillment of the national minimum requirements for awarding the ESD of "Doctor" in PF 3.8 Economics, as set out in the Law for the Development of Academic Staff in the Republic of Bulgaria (LDASRB) and the Regulations for its implementation.

The materials submitted by PhD candidate Kiril Angelov include documents in accordance with the presented list: CV, dissertation, abstract, list and summaries of publications and a Certificate for fulfillment of the minimum national requirements for acquiring the ESD of "Doctor" in professional field 3.8. Economics.

The PhD candidate has submitted five publications, including 2 articles and 3 scientific reports from scientific conferences, of which 3 are independent and 2 are co-authored with his scientific supervisor (including 1 report and 1 article).

## **2. Brief Biographical Data About the Candidate**

The PhD candidate was born in 1991 in Sofia, where he graduated the 9th French Language High School in 2010 (FLHS "Alphonse De Lamartine"). In 2014, he obtained a bachelor's degree in "Hydrogeology and Engineering Geology" at the "St. Ivan Rilski" University of Mining and Geology, and a master's degree in "Geotechnics and Engineering Geology" at the "T. Kableshkov" University of Transport, Sofia in 2018. In 2019, Kiril Angelov obtained a second master's degree – in "Accounting and Control" – at the University of Insurance and Finance (UIF, then GSIF). In 2022, by Order No. 309/27.10.2022 of the rector of GSIF (currently UIF), he was enrolled as a PhD candidate in an independent form of study. Since 2014, he has been working at "Geolobi" Ltd. as an engineer - geologist and as manager of the company.

## **3. Characteristics and Evaluation of the Dissertation Work**

The dissertation is 171 pages long and includes 21 figures and 7 tables. Its structure is comprised of an introduction, three chapters, a conclusion and a list of literary and normative sources used.

The object and subject of the research, the research thesis, the goal and objectives, the research methods, as well as the relevance of the topic of the dissertation work are presented well in the introduction. The limitations in carrying out the research are indicated as well.

The units and groupings of units in the context of the regulation for the European system of national and regional accounts, transfer pricing are presented well in the first chapter, "Transfer Pricing in an International Context and Through the Prism of European Legislation". The chapter also provides a qualitative study of different outcomes of legal disputes between multinational affiliated enterprises and tax authorities regarding transfer pricing. The chapter ends with conclusions corresponding to its content.

The second chapter, "Principles of Independent Market Relations – Essence and Directions of Research in the Context of Transfer Pricing and National Fiscal Practices", provides information on the main configurations of relatedness from a tax point of view for individuals and exemplary configurations of relatedness for legal entities from different regulatory perspectives. The comparability of transactions between related and independent persons is analyzed, as well as the main types of methods for determining market prices. This chapter examines the principle of independent market relations and the general rules for applying the methods for determining market prices. The chapter is well developed and ends with certain conclusions. The contents of the chapter are scientifically sound and demonstrate a high scientific level of the PhD candidate.

The third chapter, "Possible Optimization Models for Carrying Out, Analyzing and Verifying Transactions Between Related Parties", presents optimization models for real estate transactions between related parties, optimization models for service transactions between related legal entities and optimization models for loans between related legal entities are presented. The developed models are at a high scientific and scientific-practical level.

#### **4. Contributions and Significance of the Paper for Science and Practice**

The dissertation work contains contributions of considerable significance to science and practice.

The contributions to theory are as follows:

1. Systematization of modern achievements in the regulatory framework of transfer pricing and tax regimes related to countering tax abuses leading to tax base erosion and profit shifting in an international context.
2. Guidelines are proposed for the application of sector analysis as a tool for verifying the compliance of transactions between related parties with the arm's length principle, illustrated by an analysis of business transactions in a specific economic sector.

The contributions to practice are:

1. Deriving an analytical framework for studying the arm's length principle, combining tax, accounting, economic and sectoral parameters. Within its scope are substantiated practically applicable correction approaches and relevant numerical coefficients for making adjustments to the prices applied by related parties in controlled transactions for the purposes of bringing prices closer to the levels of comparable uncontrolled transactions.
2. Optimization methodological models have been developed for systematized solutions in three of the most common types of transactions between related parties – sale of real estate, provision of services and financing operations for intra-group lending.
3. The potential for practical application of the developed models in both national and European environments is substantiated, emphasizing their dual usefulness – both for increasing tax certainty and predictability for business, and as a tool for fiscal analysis and supporting transfer pricing control.

#### **5. Assessment of Dissertation Publications**

In connection with the dissertation work, the following articles and reports, published in non-refereed journals with scientific review or published in edited collective volumes, are presented:

1. **Angelov, Kiril**, Optimization models in the implementation and analysis of transactions between related companies, "Mechanics, Transport, Communications" scientific journal, ISSN 1312-3823

(print) ISSN 2367-6620 (online), issue 1, 2026, pp. III-8 – III-17, available at: <https://mtc-aj.com/library/2772.pdf>

2. **Angelov, Kiril**, Methods for Determining Market Prices in the Context of Transfer Pricing, Second National Student and Doctoral Conference "Code Digital: Economics, Education and Social Relations", GSIF, GSIF Publishing House "St. Gregory the Theologian", ISBN 978-619-7622-30-0, pp. 117-125, 2022, available at:

<https://vuzflab.eu/wp-content/uploads/2022/07/%D0%9A%D0%BE%D0%B4-%D0%B4%D0%B8%D0%B3%D0%B8%D1%82%D0%B0%D0%BB%D0%BD%D0%BE-%D0%B8%D0%BA%D0%BE%D0%BD%D0%BE%D0%BC%D0%B8%D0%BA%D0%B0-%D0%BE%D0%B1%D1%80%D0%B0%D0%B7%D0%BE%D0%B2%DC%B0%D0%BD%D0%B8%D0%B5-%D0%B8-%D1%81%D0%BE%D1%86%D0%B8%D0%B0%D0%BB%D0%BD%D0%B8-%D0%BE%D1%82%D0%BD%D0%BE%D1%88%D0%B5%D0%BD%D0%B8%D1%8F.pdf>

3. **Angelov, Kiril**, Desislava Yosifova, Compliance with the arm's length principle in the context of transfer pricing – research guidelines, 70 years of the Faculty of Finance and Accounting of the UNWE. International Scientific Conference, ISBN Print 13: 978-619-232-668-5, pp. 169-178, 2022, available at: <https://www.ceeol.com/search/viewpdf?id=1157770>

(URL: <https://www.ceeol.com/search/book-detail?id=1112667> )

4. **Angelov, Kiril**, Some aspects of research and presentation of related parties in the context of transfer pricing, Tenth Youth Scientific Conference "I Know and I Can", VTU "T.Kableshkov", 2022 and printed in "Young Forum", youth edition of the Scientific Journal "Mechanics Transport Communications" ISSN 2367-6558 (print) ISSN 2367-6612 (online) volume 11, issue 1, 2022, pp. III-39 – III-43, available at: <https://mtc-aj.com/article.2200.htm>

5. Yosifova, Desislava, **Angelov, Kiril**, Problems and objectives in determining prices for transfers of goods and services between related enterprises, "Mechanics, Transport, Communications" scientific journal, ISSN 1312-3823 (print) ISSN 2367-6620 (online), issue 1, 2026, pp. III-1 – III-7, available at : <https://mtc-aj.com/article.2771.htm>

The publications fit into the topic of the dissertation. They are of a high scientific level and my assessment of them is positive.

The publications can be classified by:

- type (articles – 2 in a refereed and indexed scientific journal; reports – 3 in conferences of UNWE, GSIF (Graduate School of Insurance and Finance) / currently UIF (University of Insurance and Finance) and the "T. Kableshkov" University of Transport.

- by place of publication – all have been published in Bulgaria;

- by language in which they are written – 5 are in Bulgarian, with 3 of them having titles, summaries and key words in English.

- by number of co-authors (independent – 3, with one co-author – 2).

## **6. Assessment of Compliance with Minimum National Requirements**

The report on the fulfillment of the minimum national requirements for acquisition of the ESD of "Doctor" in professional field 3.8. Economics by Kiril Angelov shows that he has achieved 90 points.

## **7. Synopsis**

The submitted synopsis consists of 41 pages. It correctly reflects the content and issues addressed in the dissertation.

## **8. Critical Notes, Questions and Recommendations**

I have no critical remarks, questions or recommendations.

## **CONCLUSION**

The dissertation work contains scientific, scientifically-applied and applied results which represent an original contribution to science and meet all the requirements of the Law for the Development of Academic Staff in the Republic of Bulgaria (LDASRB) and the Regulations for the Implementation of its Application. The presented materials and dissertation results fully meet the specific requirements of the Regulations for the Admission and Training of Doctoral Students at the University of Insurance and Finance.

The dissertation shows that the candidate Kiril Angelov possesses in-depth theoretical knowledge and professional skills in Professional Field 3.8. Economics, demonstrating qualities and skills for independent conduct of scientific research.

In view of the above, I give my positive assessment of the conducted research, presented by a dissertation, synopsis, achieved results and contributions, and I propose to the esteemed members of the scientific jury that the educational and scientific degree of "Doctor" be awarded to Kiril Angelov in the Field of Higher Education 3. Social, Economic and Legal Sciences; Professional Field 3.8. Economics.

Sofia, 24.04.2026

Author of the opinion:

/ Prof. Dr. Marin Galabov /