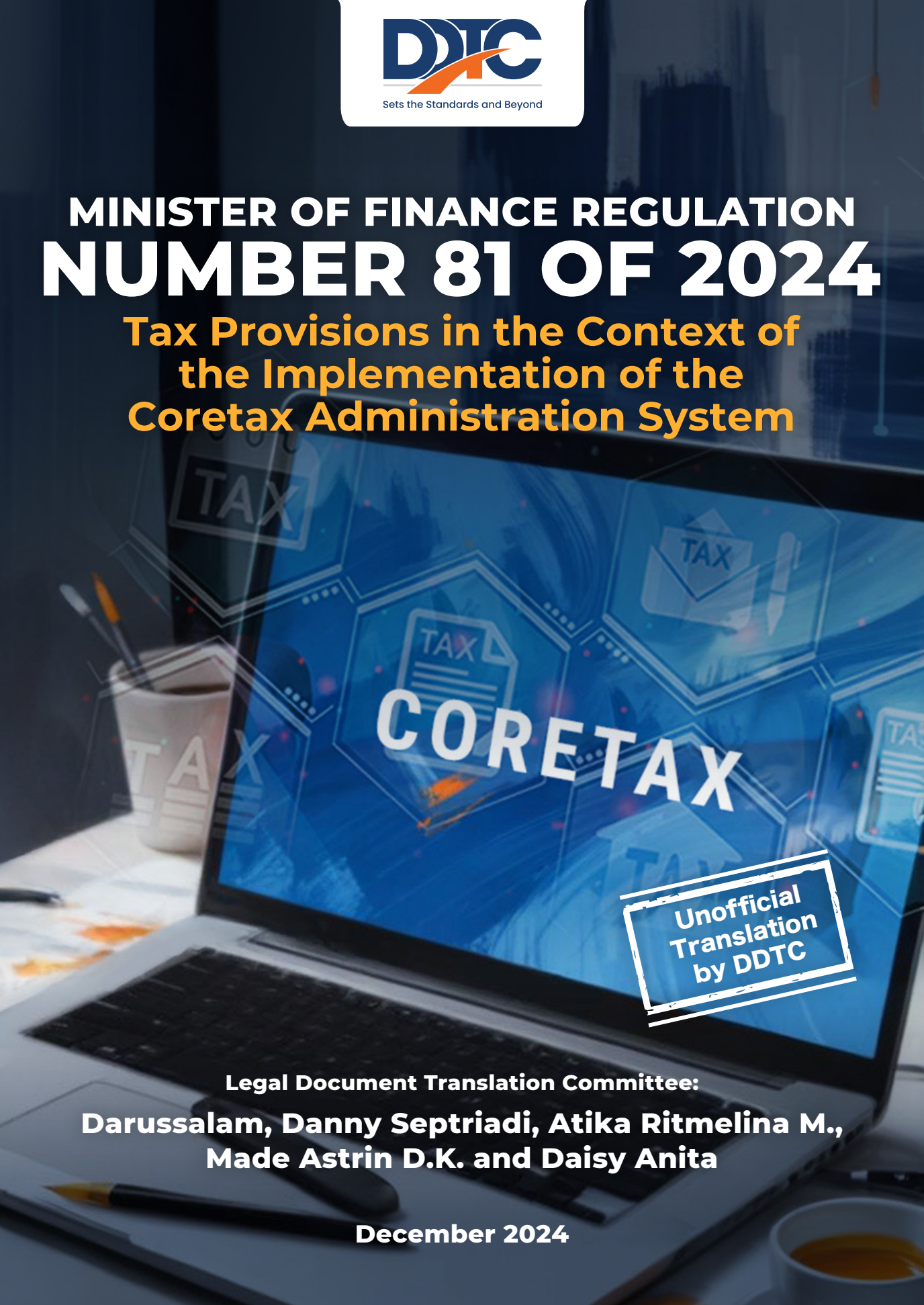
Sets the Standards and Beyond

MINISTER OF FINANCE REGULATION NUMBER 81 OF 2024

Tax Provisions in the Context of the Implementation of the Coretax Administration System



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December 2024

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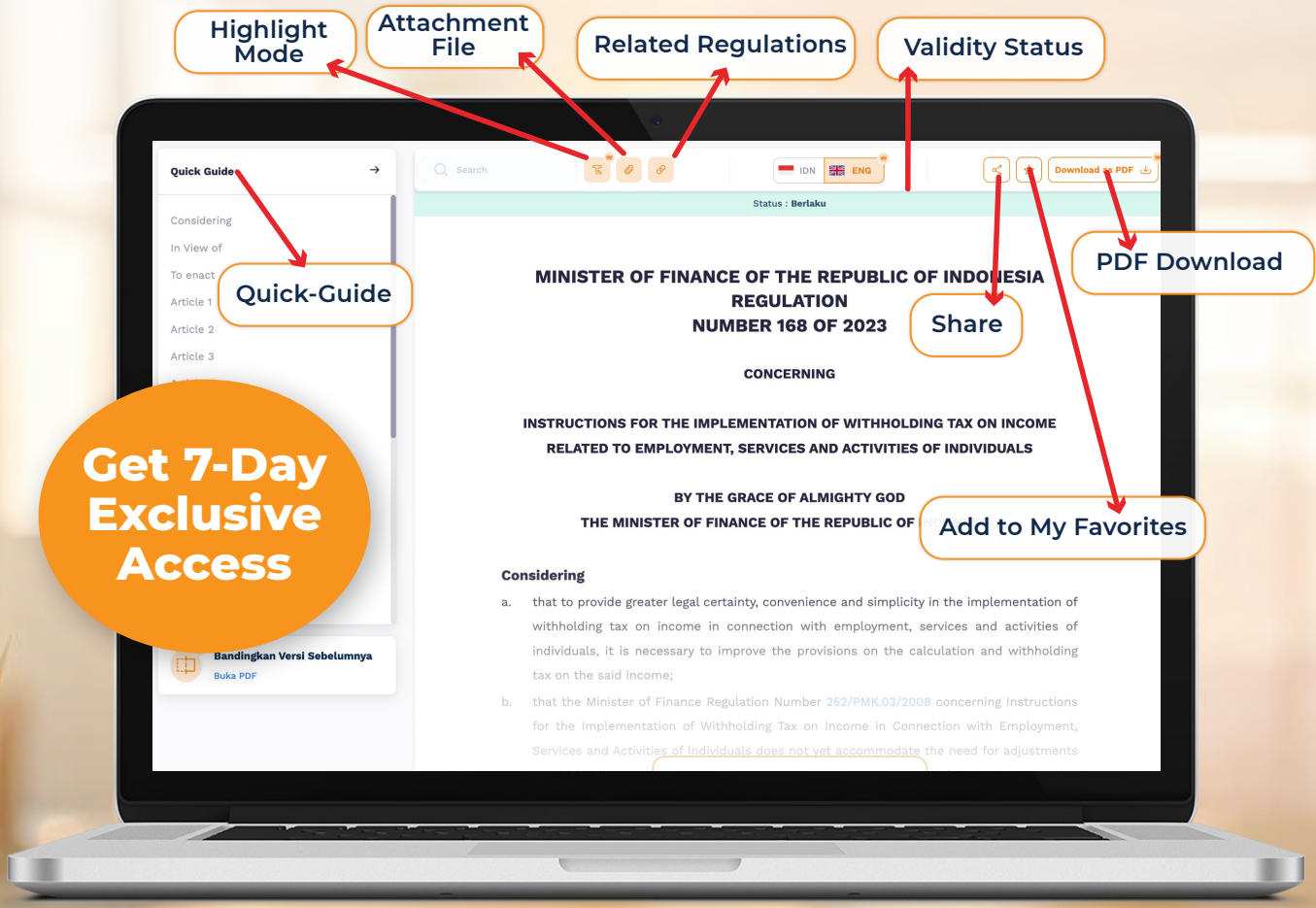

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INTRODUCTION

The Coretax Administration System (CTAS) marks a new chapter in the Indonesia taxation sector. To that end, the government has released MoF Reg. 81/2024 which contains tax provisions for the implementation of the CTAS.

On account of the significance of MoF Reg. 81/2024 for all stakeholders, both domestic and overseas, DDTC presents a translation of the regulation in English. The aim is to expand the scope of comprehend of Indonesian statutory tax provisions.

For the Indonesian people, this translation may serve as guidelines when working cross-border in line with the era of globalisation and digitalisation of the economy. For foreign nationals, including investors, this translation may function as a reference to understand Indonesian domestic tax administration provisions.

This is also consistent with one of DDTC's missions, i.e., eliminating asymmetric tax-related information. To date, the Perpajakan DDTC platform provides access to 495 regulatory documents, 75 tax treaty documents, 180 newsletters as well as 50 tax guidelines in English.

To strengthen the concrete embodiment of this mission, the updated biweekly DDTC Indonesian Tax Manual (DDTC ITM) has also been published. DDTC ITM constitutes a reference for Indonesian statutory provisions in English.

Please note that the translated documents on the Perpajakan DDTC platform are non-government agency official translations. This also applies to the translated document of MoF Reg. 81/2024. This disclaimer consistently appears in every translated document on Perpajakan DDTC.

All contents, however, are translated by reliable and experienced translators. Moreover, DDTC professionals are familiar with a wide array of documents in English frequently released by international organisations, such as the OECD and the World Bank.

DDTC professionals are well-versed in seminars, conferences, training and international certification. In addition, having multinational clients and colleagues allows DDTC professionals to be accustomed to commonly used English tax terms (best practice).

Over again, DDTC is a firm believer that English, as the *lingua franca* of international business, allows practitioners to communicate, present issues and negotiate solutions without language barriers. Hopefully this translated document may be beneficial for you.

The public may also submit requests for translation of English regulations via https://bit.ly/requestenglishPID. Should you have further questions, please contact Perpajakan DDTC via WhatsApp: 0813-8080-4136 or email info.perpajakan@ddtc.co.id.

Jakarta, December 2024

Darussalam, Danny Septriadi, Atika Ritmelina M.,
Made Astrin D.K. and Daisy Anita.

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MINISTER OF FINANCE OF THE REPUBLIC OF INDONESIA REGULATION NUMBER 81 OF 2024

CONCERNING

TAX PROVISIONS IN THE CONTEXT OF THE IMPLEMENTATION OF THE CORETAX ADMINISTRATION SYSTEM

BY THE GRACE OF ALMIGHTY GOD
THE MINISTER OF FINANCE OF THE REPUBLIC OF INDONESIA,

Considering

a. that to implement a more transparent, effective, efficient, accountable and flexible tax administration system update, it is necessary to organise statutory laws and regulations in the field of taxation that are fair and have legal certainty to increase tax revenues and support the national economy;
b. that the organisation of statutory laws and regulations in the field of taxation is conducted within the scope of business processes as well as information technology and databases, including through adjustments to the taxpayer registration and VAT registration, tax payment and remittance, filing of taxes as well as tax administration services;
c. that based on the considerations referred to in letter a and letter b as well as to implement the provisions under Article 9 of Presidential Regulation Number 40 of 2018 concerning Tax Administration System Update, it is necessary to enact a Minister of Finance Regulation concerning Tax Provisions in the Context of the Implementation of the Core tax Administration System;

In View of

1. Article 17 paragraph (3) of the 1945 Constitution of the Republic of Indonesia;
2. Law Number 6 of 1983 concerning General Provisions and Tax Procedures (State Gazette of the Republic of Indonesia of 1983 Number 49, Supplement to the State Gazette of the Republic of Indonesia Number 3262) as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law (State Gazette of the Republic of Indonesia of 2023 Number 41, Supplement to the State Gazette of the Republic of Indonesia Number 6856);
3. Law Number 7 of 1983 concerning Income Tax (State Gazette of the Republic of Indonesia of 1983 Number 50, Supplement to the State Gazette of the Republic of Indonesia Number 3263) as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law (State Gazette of the Republic of Indonesia of 2023 Number 41, Supplement to the State Gazette of the Republic of Indonesia Number 6856);

4. Law Number 8 of 1983 concerning Value Added Tax on Goods and Services and Sales Tax on Luxury Goods (State Gazette of the Republic of Indonesia of 1983 Number 51, Supplement to the State Gazette of the Republic of Indonesia Number 3264) as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law (State Gazette of the Republic of Indonesia of 2023 Number 41, Supplement to the State Gazette of the Republic of Indonesia Number 6856);
5. Law Number 12 of 1985 concerning Land and Building Tax (State Gazette of the Republic of Indonesia of 1985 Number 68, Supplement to the State Gazette of the Republic of Indonesia Number 3312) as amended by Law Number 12 of 1994 concerning the Amendment to Law Number 12 of 1985 concerning Land and Building Tax (State Gazette of the Republic of Indonesia of 1994 Number 62, Supplement to the State Gazette of the Republic of Indonesia Number 3569);
6. Law Number 39 of 2008 concerning States Ministries (State Gazette of the Republic of Indonesia of 2008 Number 166, Supplement to the State Gazette of the Republic of Indonesia Number 4916);
7. Law Number 10 of 2020 concerning Stamp Duty (State Gazette of the Republic of Indonesia of 2020 Number 240, Supplement to the State Gazette of the Republic of Indonesia Number 6571);
8. Law Number 7 of 2021 concerning the Harmonisation of Tax Regulations (State Gazette of the Republic of Indonesia of 2021 Number 246, Supplement to the State Gazette of the Republic of Indonesia Number 6736);
9. Government Regulation Number 23 of 2015 concerning Joint Management of Oil and Gas Natural Resources in Aceh (State Gazette of the Republic of Indonesia of 2015 Number 99, Supplement to the State Gazette of the Republic of Indonesia Number 5696);
10. Government Regulation Number 93 of 2021 concerning Income Tax Treatment of the Transfer of Participating Interest in Upstream Oil and Gas Businesses (State Gazette of the Republic of Indonesia of 2021 Number 201, Supplement to the State Gazette of the Republic of Indonesia Number 6717);
11. Government Regulation Number 50 of 2022 concerning Procedures for the Exercise of Tax Rights and Fulfilment of Tax Obligations (State Gazette of the Republic of Indonesia of 2022 Number 226, Supplement to the State Gazette of the Republic of Indonesia Number 6834);
12. Presidential Regulation Number 57 of 2020 concerning the Ministry of Finance (State Gazette of the Republic of Indonesia of 2020 Number 98);
13. Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153);
14. Minister of Finance Regulation Number 118/PMK.01/2021 concerning the Organisation and Work Procedures of the Ministry of Finance (Official

Gazette of the Republic of Indonesia of 2021 Number 1031) as amended several times, last amended by the Minister of Finance Regulation Number 135 of 2023 concerning the Second Amendment to the Minister of Finance Regulation Number 118/PMK.01/2021 concerning the Organisation and Work Procedures of the Ministry of Finance (Official Gazette of the Republic of Indonesia of 2023 Number 977);

15. Minister of Finance Regulation Number 112/PMK.03/2022 concerning Taxpayer Identification Numbers for Individual Taxpayers, Corporate Taxpayers and Government Agency Taxpayers (Official Gazette of the Republic of Indonesia of 2022 Number 660) as amended by the Minister of Finance Regulation Number 136 of 2023 concerning the Amendment to the Minister of Finance Regulation Number 112/PMK.03/2022 concerning Taxpayer Identification Numbers for Individual Taxpayers, Corporate Taxpayers and Government Agency Taxpayers (Official Gazette of the Republic of Indonesia of 2023 Number 983);

HAS DECIDED:

To enact

MINISTER OF FINANCE REGULATION CONCERNING TAX PROVISIONS IN THE CONTEXT OF THE IMPLEMENTATION OF THE CORETAX ADMINISTRATION SYSTEM.

CHAPTER I
GENERAL PROVISIONS

Article 1

Referred to herein this Ministerial Regulation:

1. General Provisions and Tax Procedures Law is Law Number 6 of 1983 concerning General Provisions and Tax Procedures as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law.
2. Income Tax Law is Law Number 7 of 1983 concerning Income Tax as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law.
3. Value Added Tax Law is Law Number 8 of 1983 concerning Value Added Tax on Goods and Services and Sales Tax on Luxury Goods as amended several times, last amended by Law Number 6 of 2023 concerning the Enactment of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law.
4. Land and Building Tax Law is Law Number 12 of 1985 concerning Land and Building Tax as amended by Law Number 12 of 1994 concerning the Amendment to Law Number 12 of 1985 concerning Land and Building Tax.
5. Stamp Duty Law is Law Number 10 of 2020 concerning Stamp Duty.
6. Income Tax is income tax stipulated under the Income Tax Law.

7. Article 22 Income Tax is Income Tax stipulated under Article 22 of the Income Tax Law.
8. Article 29 Income Tax is Income Tax stipulated under Article 29 of the Income Tax Law.
9. Value Added Tax is value added tax stipulated under the Value Added Tax Law.
10. Sales Tax on Luxury Goods is sales tax on luxury goods stipulated under the Value Added Tax Law.
11. Land and Building Tax is land and building tax stipulated under the Land and Building Tax Law other than rural and urban land and building tax.
12. Stamp Duty is a tax on documents stipulated under the Stamp Duty Law.
13. Carbon Tax is a tax imposed on carbon emissions that have a negative impact on the environment.
14. Sales Tax is a tax collected on supplies of goods and/or services conducted by entrepreneurs within the customs territory within their company or work stipulated under Emergency Law Number 19 of 1951 concerning the Collection of Sales Tax as amended several times, last amended by Law Number 2 of 1968 concerning the Amendment/Addition to the 1951 Sales Tax Law.
15. Taxes on Imports are Value Added Tax, Sales Tax on Luxury Goods and/or Article 22 Income Tax.
16. Output VAT is Value Added Tax payable which must be collected by Taxable Persons performing supplies of taxable goods, supplies of taxable services, exports of tangible taxable goods, exports of intangible taxable goods and/or exports of taxable services.
17. Input VAT is Value Added Tax that should have been paid by taxable persons due to an acquisition of taxable goods and/or acquisition of taxable services and/or utilisation of intangible taxable goods from outside the customs territory and/or utilisation of taxable services from outside the customs territory and/or imports of taxable goods.
18. Taxpayer is any individual or entity, comprising a taxpayer, a withholding agent and a collection agent having tax rights and obligations pursuant to statutory tax provisions.
19. Taxable Person is an entrepreneur supplying taxable goods and/or supplying taxable services that are subject to taxes pursuant to the Value Added Tax Law.
20. Tax Return is a letter used by a Taxpayer to file the calculation and/or payment of taxes, taxable objects and/or non-taxable objects and/or assets and liabilities pursuant to statutory provisions in the field of taxation.
21. Taxpayer Portal is a means for Taxpayers to exercise tax rights and fulfil tax obligations electronically on the Directorate General of Taxes webpage.
22. Contact Center is an electronic interaction channel between Taxpayers and the Directorate General of Taxes managed by certain units in the Directorate General of Taxes by utilising information and communication technology.

23. Tax Office is a vertical agency of the Directorate General of Taxes under and directly responsible to the Head of the Directorate General of Taxes Regional Office.
24. Tax Services, Dissemination and Consultation Office, is a vertical agency of the Directorate General of Taxes which is under and directly responsible to the Head of the Tax Office.
25. Western Indonesian Time is the western Indonesian time stipulated under the Presidential Decree concerning the division of the territory of the Republic of Indonesia into 3 (three) time zones.
26. Taxpayer Account is a media for recording, storing and submitting documents, data and/or information related to the exercise of tax rights and fulfilment of tax obligations of a Taxpayer or the implementation of duties and functions of the Directorate General of Taxes, identified using the taxpayer identification number.
27. Electronic Information is one or a set of electronic data, including but not limited to writing, sound, pictures, maps, designs, photographs, electronic data interchange, electronic mail, telegram, telex, telecopy or the like, letters, signs, numbers, access codes, symbols or processed perforations that have meaning or are comprehensible by people who are able to understand them.
28. Electronic Documents are any Electronic Information created, forwarded, delivery, received or stored in analogue, digital, electromagnetic, optical or similar format, which may be seen, displayed and/or heard through a computer or electronic system, including but not limited to writing, sounds, pictures, maps, designs, photographs or the like, letters, signs, numbers, access codes, symbols or perforations that have meaning or definitions or may be understood by persons who are able to understand them.
29. Notice of Tax Assessment is a notice of assessment that includes the notice of tax underpayment assessment, notice of additional tax underpayment assessment, notice of nil tax assessment and notice of tax overpayment assessment.
30. Electronic Signature is a signature consisting of Electronic Information attached to, associated with or related to other Electronic Information that is used as a verification and authentication tool.
31. Electronic Certificate is an electronic certificate containing an Electronic Signature and identity indicating the status of the legal subjects of the parties in an electronic transaction issued by the provider of electronic certificates.
32. Electronic Certification Provider is a legal entity that functions as a trustworthy party that provides and audits Electronic Certificates.
33. Government Agency is a central government agency, local government agency and village government agency, that conducts government activities as well as is authorised and responsible for the use of the budget.
34. Authorisation Code is a verification and authentication tool used by a Taxpayer to perform an uncertified Electronic Signature issued by the Directorate General of Taxes.

35. Entity is a group of people and/or capital that constitutes a unit that either conducts business or not, including limited liability companies, limited partnerships, other companies, state-owned enterprises or local-owned enterprises in whatever name and form, firms, joint ventures, cooperatives, pension funds, partnerships, alliances, foundations, mass organisations, social political organisations or other organisations, institutions and other forms of bodies, including collective investment contracts, permanent establishments as well as representative offices of foreign companies and joint investment contracts.
36. Undivided inheritance Taxpayer as a unit in lieu of the beneficiaries, hereinafter referred to as Undivided Inheritance Taxpayer, is an undivided inheritance Taxpayer as a unit in lieu of the beneficiaries pursuant to tax statutory provisions in the field of taxation.
37. Central Government Agency is a work unit in ministries, non-ministerial government institutions, state institution secretariats and non-structural institution secretariats, including public service agencies, as users of the state budget required to maintain accounting and prepare financial statements according to government accounting standards.
38. Local Government Agency is a provincial local government work unit and a regency/municipal local government work unit, including local public service agencies, as users of the local government budget required to maintain accounting and prepare financial statements according to government accounting standards.
39. Village Government Agency is an organisational unit that administers village governance as a user of the village budget required to maintain accounting and prepare financial statements according to government accounting standards.
40. Notice of Tax Collection is a letter to collect tax and/or administrative penalties in the form of an interest and/or fine.
41. Notice of Tax Underpayment Assessment is a Notice of Tax Assessment that determines the principal amount of tax, the amount of tax credit, the principal amount of tax underpayment, the amount of administrative penalties and the amount of outstanding tax.
42. Notice of Additional Tax Underpayment Assessment is a Notice of Tax Assessment that determines the addition to the assessed amount of tax.
43. Notice of Nil Tax Assessment is a Notice of Tax Assessment that determines the principal amount of tax is equal to the amount of tax credit or the tax is not payable and there is no tax credit.
44. Notice of Tax Overpayment Assessment is a Notice of Tax Assessment that determines the amount of tax overpayment resulting from a greater amount of tax credit than tax payable or should not otherwise be payable.
45. Notice of Land and Building Tax Assessment is a notice of assessment that determines the principal amount of Land and Building Tax or the difference in the principal amount of Land and Building Tax, the amount of administrative fines and the amount of outstanding Land and Building Tax.

46. Notice of Land and Building Tax Collection is Notice of Tax Collection stipulated under the Land and Building Tax Law.
47. Amendment Decision Letter is a decision letter that amends misspellings, miscalculations and/or misapplication of particular provisions under statutory tax laws and regulations in a Notice of Tax Assessment, Notice of Tax Collection, amendment decision letter, objection decision letter, administrative penalty reduction decision letter, administrative penalty nullification decision letter, tax assessment reduction decision letter, tax assessment cancellation decision letter, preliminary tax refunds decision letter, interest compensation decision letter, notice of tax due, Notice of Land and Building Tax Assessment, Notice of Land and Building Tax Collection, Land and Building Tax reduction decision letter, Land and Building Tax administrative fine reduction decision letter or mutual agreement decision letter.
48. Mutual Agreement Decision Letter is a decision letter issued to follow up on the agreement in the mutual agreement.
49. Objection Decision Letter is a decision letter for an objection against a Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment, Notice of Nil Tax Assessment, Notice of Tax Overpayment Assessment, notice of tax due, Notice of Land and Building Tax Assessment, withholding tax by a third party or tax collection by a third party.
50. Administrative Penalty Reduction Decision Letter is a decision letter issued by the Director General of Taxes which contains:
    a. the reduction of administrative penalties listed in the Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment or Notice of Tax Collection; or
    b. the rejection of the application for the reduction of administrative penalties submitted by a Taxpayer.
51. Administrative Penalty Nullification Decision Letter is a decision letter issued by the Director General of Taxes which contains:
    a. the nullification of administrative penalties listed in the Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment or Notice of Tax Collection; or
    b. the rejection of the application for the nullification of administrative penalties submitted by a Taxpayer.
52. Land and Building Tax Administrative Fine Reduction Decision Letter is a decision letter issued by the Director General of Taxes which contains:
    a. the reduction of Land and Building Tax administrative fines listed in the Notice of Land and Building Tax Assessment or Notice of Land and Building Tax Collection; or
    b. the rejection of the application for the reduction of Land and Building Tax administrative fines submitted by a Taxpayer.
53. Tax Assessment Reduction Decision Letter is a decision letter issued by the Director General of Taxes which contains:
    a. the reduction of the incorrect assessment materials in the Notice of Tax Underpayment Assessment, the Notice of Additional Tax

Underpayment Assessment, the Notice of Nil Tax Assessment, the Notice of Tax Overpayment Assessment or Notice of Tax Collection;
b. the reduction of the incorrect amount of tax in the notice of tax due;
c. the reduction of the incorrect principal amount of tax, the principal amount of tax difference and/or administrative fines in the Notice of Land and Building Tax Assessment; or
d. the rejection of the application for reduction submitted by a Taxpayer.

54. Notice of Tax Due is a letter used by the Directorate General of Taxes to notify the amount of Land and Building Tax payable to a Taxpayer.
55. Tax Assessment Cancellation Decision Letter is a decision letter issued by the Director General of Taxes which contains:
    a. the cancellation of the Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment, Notice of Nil Tax Assessment, Notice of Tax Overpayment Assessment, Notice of Tax Collection, Notice of Tax Due, Notice of Land and Building Tax Assessment or Notice of Land and Building Tax Collection; or
    b. the rejection of the application for cancellation submitted by a Taxpayer.
56. Preliminary Tax Refund Decision Letter is a decision letter that determines the amount of preliminary tax refunds for a certain Taxpayer.
57. Interest Compensation Decision Letter is a decision letter that determines the amount of interest compensation granted to a Taxpayer.
58. Tax Refund Decision Letter is a decision letter used as the basis to issue the disbursement of refund claim.
59. Electronic Seal is electronic data that is attached, associated or related to Electronic Information and/or Electronic Documents to guarantee the origin, integrity and completeness of Electronic Information and/or Electronic Documents used by business entities or agencies.
60. Taxpayer Identification Number is a number issued to a Taxpayer as a means of tax administration that is used as the personal identification or identity of the Taxpayer in exercising their tax rights and obligations.
61. Indonesian Citizen is a native Indonesian person or a person of another nationality who has been legalised as an Indonesian citizen pursuant to statutory provisions stipulating citizenship of the Republic of Indonesia.
62. Residents are Indonesian Citizens and foreigners residing in Indonesia.
63. Certain Entrepreneur Individual Taxpayer is an individual Taxpayer conducting trade or service business activites, excluding services in connection with independent personal services, in 1 (one) or more places of business activity that differ from the Taxpayer's residence as stipulated under statutory laws and regulations in the field of taxation.
64. Place of Business Identification Number is an identification number granted to each place of business of a Taxpayer, including the Taxpayer's residence or domicile.
65. National Identification Number is a Resident's identification number that is unique or distinctive, single and inherent to a person registered as an Indonesian Resident.

66. Tax Year is a period of 1 (one) calendar year, except for Income Tax, which may use the accounting year, in the event that a Taxpayer adopts an accounting year that is different from the calendar year.
67. Audit is a series of activities to collect and process data, details and/or evidence implemented in an objective and professional manner based on an auditing standard to assess compliance in the fulfilment of tax obligations and/or for other purposes to implement statutory provisions in the field of taxation.
68. Non-active Taxpayers are Taxpayers that do not fulfil the subjective and/or objective requirements but have not been subject to Taxpayer Identification Number deregistration.
69. Certificate of Indonesian Citizens Fulfilling the Requirements to Become Non-Tax Residents is a letter issued by the Head of the Tax Office on behalf of the Director General of Taxes explaining that an Indonesian Citizen fulfils the requirements to be a non-tax resident.
70. Taxpayer Identification Number Deregistration is an act of deregistering a Taxpayer Identification Number from the administration of the Directorate General of Taxes.
71. Tax Liability is outstanding tax, including administrative penalties in the form of interest, fines or surcharges stated in the notice of tax assessment or similar letters pursuant to statutory tax provisions.
72. Mutual Agreement Procedure is an administrative procedure regulated in a tax treaty to resolve issues arising in the application of the tax treaty.
73. State Budget is the state's governance annual financial plan approved by the House of Representatives.
74. Entrepreneur is an individual or Entity in whatever form that in the course of business or work produces goods, imports goods, exports goods, conducts trading business, utilises intangible goods from outside from outside the customs territory, conducts service business, including exporting services or utilising services from outside the customs territory.
75. Virtual Office or Co-Working Space, hereinafter referred to as Virtual Office, is an office that has a physical room and is equipped with office supporting services provided by a virtual office service Entrepreneur to be used as the domicile, place of business or correspondence jointly by 2 (two) or more Entrepreneurs, in which the utilisation of the said office contains payment in whatever form, excluding building rent services and office rental services (serviced offices).
76. Foreign National is any person not constituting an Indonesian Citizen.
77. Tax Invoice is a collection receipt prepared by a Taxable Person supplying taxable goods or supplying taxable services.
78. VAT Deregistration is an act of deregistering a Taxable Person from the administration of the Directorate General of Taxes.
79. Taxable Period is a period used as the basis for a Taxpayer to calculate, remit and file tax payable in a certain period pursuant to statutory provisions in the field of taxation.
80. Fraction of a Tax Year is a fraction of a period of 1 (one) Tax Year.

81. Cooperation Contracts are production sharing contracts or other forms of cooperation contracts in exploration and exploitation activities which are more profitable to the state and the proceeds are used for the greatest prosperity of the people.
82. Certificate of Taxable Object Registration is a certificate issued by the Head of the Tax Office as notification that the taxable objects and Taxpayer have been registered in the tax administration system of the Directorate General of Taxes.
83. Contractor is a business entity or permanent establishment determined to conduct exploration and exploitation in a working area based on a Cooperation Contract with the special task force for upstream oil and gas business or Aceh oil and gas management agency pursuant to statutory provisions.
84. Online Single Submission Management and Organiser Institution, hereinafter referred to as the Online Single Submission Institution, is a government institution that administers governmental affairs in the field of investment/investment coordination.
85. Taxable Object Number is the identification number of a taxable object as a means of tax administration issued by the Director General of Taxes.
86. Land and Building Tax Taxable Objects, hereinafter referred to as Taxable Objects, are land and/or building constituting taxable objects of Land and Building Tax in the plantation sector, Land and Building Tax in the forestry sector, Land and Building Tax in the oil and gas mining sector, Land and Building Tax in the mining sector for geothermal concession, Land and Building Tax in the mineral or coal mining sector and Land and Building Tax in other sectors.
87. Notice of Taxable Objects is a letter used by a Taxpayer to file the data on Taxable Objects pursuant to the provisions under the Land and Building Tax Law attached with the attachment to the notice of Taxable Objects which constitutes an integral part of the notice of Taxable Objects.
88. Electronic Notice of Taxable Objects is a Notice of Taxable Objects in the form of Electronic Documents.
89. Data Collection is the activity of the Directorate General of Taxes to obtain, complete and administer data on Taxable Objects and/or Taxpayers, including geographic information on Taxable Objects for tax administration purposes.
90. Taxable Goods are goods subject to tax pursuant to the Value Added Tax Law.
91. Periodic Value Added Tax Return is a letter used by a Taxpayer to file the calculation and/or payment of Value Added Tax, Value Added Tax objects and/or non-Value Added Tax objects pursuant to statutory tax provisions for a Taxable Period.
92. Taxable Services are services subject to tax pursuant to the Value Added Tax Law.
93. Periodic Tax Return is Tax Return for a Taxable Period.
94. Value Added Tax Collection Agent is a government treasurer, Entity or Government Agency appointed by the Minister of Finance to collect, remit

and file tax payable to Taxable Persons on supplies of Taxable Goods and/or supplies of Taxable Services to the government treasurer, Entities or Government Agencies.

95. Other Parties are parties directly involved or facilitating a transaction between parties to the transaction that are appointed by the Minister of Finance to perform withholding, collection, remittance and/or filing of taxes stipulated under Article 32A of the General Provisions and Tax Procedures Law.
96. Annual Tax Return is a Tax Return for a Tax Year or a Fraction of a Tax Year.
97. Appeal Decision is a tax judicial body decision on an appeal against an Objection Decision Letter filed by a Taxpayer.
98. Closing Conference is a discussion between a Taxpayer and tax auditors on Audit findings, the results of which are outlined in the official report of closing conference, which are signed by both parties and contain corrections to the principal amount of tax payable, either those that are approved or those that are disapproved and the calculation of administrative penalties.
99. Civil Review Decision is a Supreme Court decision on the application for a civil review submitted by a Taxpayer or the Director General of Taxes against an Appeal Decision or lawsuit decision from the tax judicial body.
100. Service is any service activity, based on a contract or legal action that results in goods, facilities, concessions or rights being available to be used, including services conducted to produce goods due to orders or demand with materials and based on instructions from the buyer.
101. State Treasury is an account where state money is remitted determined by the Minister of Finance as the state general treasurer to accommodate all state revenues and to pay all state expenditures.
102. Collecting Agents are revenue agents which include tax payment banks, tax payment post offices, foreign exchange tax payment banks, other tax payment institutions or other foreign exchange tax payment institutions appointed by the proxy of the central state general treasurer to receive state revenue remittances.
103. Tax Payment Slip is a receipt of tax payment or remittance that has been performed using a form or that has been performed using other methods to the State Treasury through the Collecting Agent.
104. Stamp is a label or strip in the form of an adhesive stamp, electronic or another form that has the characteristics and contains security elements issued by the Government of the Republic of Indonesia, used to pay the tax on documents.
105. State Revenue Receipt is a document issued by a Collecting Agent for a state revenue transaction that lists the state revenue transaction number and bank transaction number/postal transaction number/another tax payment institution transaction number as other administrative means equivalent to a payment slip.
106. Customs, Excise and Tax Payment Slip is a payment slip for state revenues in the context of imports in the form of import duty, administrative fines,

other customs revenues, excise, other excise revenues, employment services, interest and Import Article 22 Income Tax, Import Value Added Tax as well as Import Sales Tax on Luxury Goods.

107. Overbooking Receipt is a receipt indicating that an Overbooking has been conducted.
108. Overbooking is a process of overbooking tax revenues to be recorded in the appropriate tax revenues.
109. Fund Disbursement Order is an order issued by the state treasury office as the proxy of the state general treasurer for the implementation of expenditures borne by the State Budget based on the disbursement of refund claim or payment order for interest compensation.
110. Special Task Force for Upstream Oil and Gas Business is a task force unit that manages upstream oil and gas business established pursuant to Presidential Regulation Number 9 of 2013 concerning the Implementation of the Management of Upstream Oil and Gas Businesses.
111. Aceh Oil and Gas Management Agency is a government body established to conduct joint management and control of upstream businesses in the oil and gas sector located on land and sea in the Aceh jurisdiction (0 to 12 nautical miles).
112. Tax Deposit is the payment of tax that does not yet refer to certain tax obligations.
113. Bookkeeping is a recording process conducted regularly to collect financial data and information that include assets, liabilities, capital, income and expenses as well as the amount of acquisition and supply prices of goods or Services, summarised by preparing financial statements in the form of balance sheet and income statement for the Tax Year period.
114. Customs Territory is the territory of the Republic of Indonesia which includes land, waters and airspace above it as well as certain places in the exclusive economic zone and the continental shelf in which the law stipulating customs is applicable.
115. Electronic Commerce is trade in which transactions are conducted through a set of electronic devices and procedures.
116. Foreign Exchange Tax Payment Bank is a foreign exchange bank appointed by the proxy of the central state general treasurer to receive remittances of state revenues in foreign currency from within the country and/or overseas.
117. Disbursement of Refund Claim is an order from the Head of the Tax Office to the state treasury office to issue a Fund Disbursement Order as the basis for compensation of Tax Liabilities and/or the basis for the repayment of tax overpayment to a Taxpayer.
118. Gross Income is all income received and/or accrued from business activities and from other than business activities, after being deducted by sales returns and discounts as well as cash discounts in the Tax Year concerned, before being deducted by the expenses to derive, collect and maintain income, both from Indonesia and from overseas.

119. Tax Treaty is an agreement between the Government of Indonesia and the government of a tax treaty partner in the context of the avoidance of double taxation and prevention of tax evasion.
120. Notice of Tariff and/or Customs Value Assessment is a notice of assessment by customs and excise officials stipulated under the Ministerial Regulation stipulating procedures for the assessment of tariffs, customs values and administrative penalties as well as the assessment by the Director General of Customs and Excise or customs and excise officials.
121. Notice of Tariff and/or Customs Value Re-assessment is a notice of assessment by customs and excise officials stipulated under the Ministerial Regulation stipulating procedures for the assessment of tariffs, customs values and administrative penalties as well as the assessment by the Director General of Customs and Excise or customs and excise officials.
122. Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports is a collection form to collect import duty, excise, administrative fines, interest and Taxes on Imports that are not paid or underpaid by importers, carriers, temporary storage operators, bonded storage operators or customs brokers, issued by customs and excise officials stipulated under the Ministerial Regulation stipulating procedures for the collection of import duty, excise, administrative fines, interest and Taxes on Imports receivables.
123. Notice of Customs Assessment is a notice of assessment by customs and excise officials stipulated under the Ministerial Regulation stipulating procedures for the assessment of tariffs, customs values and administrative penalties as well as the assessment by the Director General of Customs and Excise or customs and excise officials.
124. Mutual Agreement is the results agreed upon in the application of a Tax Treaty by the competent authority of the government of Indonesia and the competent authority of the Tax Treaty partner government in connection with the Mutual Agreement Procedure that has been implemented.
125. Certificate of Domicile of Non-Resident Taxpayer is a certificate issued by the competent authority in the field of taxation or officials appointed based on the Tax Treaty that contains the residence of a non-tax resident using a form pursuant to statutory provisions in the field of taxation.
126. Payment Order for Interest Compensation is a letter issued by the Head of the Tax Office on behalf of the Minister to pay interest compensation to a Taxpayer.
127. Computer Data Archives are data archives in the form of softcopy that are stored in digital storage media.
128. State Treasury Office is a vertical agency of the Directorate General of Treasury authorised by the proxy of state general treasurer to implement a part of the functions of the proxy of state general treasurer.
129. Unified Periodic Income Tax Returns are Periodic Tax Returns used by Income Tax withholding or collection agents to file the obligation of Withholding Tax and/or Income Tax collection, remittance of the Withholding Tax and/or Income Tax collection and/or self-remittance of

several types of Income Tax in 1 (one) Taxable Period, pursuant to statutory provisions in the field of taxation.

130. Lifting is the amount of oil and/or gas available to be sold or distributed at the custody transfer point.
131. Real Estate is physical land and the buildings thereon.
132. Collective Investment Contract is a collective investment contract pursuant to statutory laws and regulations stipulating the capital market.
133. Article 25 Income Tax Instalment is an Income Tax instalment in the current Tax Year for a certain month that must be self-paid by a Taxpayer stipulated under Article 25 of the Income Tax Law.
134. Tax Return Examination is a series of activities conducted to assess the completeness of the completion of the Tax Return and its attachments, including an assessment of the correctness of the spelling and calculations.
135. State-Owned Enterprise is a business entity whose capital is entirely or mostly owned by the state through direct participation originating from separated state assets.
136. Special Purpose Company is a limited liability company whose shares are held by a Real Estate investment trust in the form of a Collective Investment Contract of a minimum of 99.9% (ninety-nine point nine per cent) of the paid-up capital incorporated solely for Real Estate investment trust purposes in the form of a Collective Investment Contract.
137. Real Estate Investment Trust is a vehicle used to raise funds from the investor community to be further invested in Real Estate assets, Real-Estate-related assets and/or cash and cash equivalents.
138. Tax Clearance Certificate is information on Taxpayer compliance during a certain period to fulfil the requirements to obtain services or in the context of the implementation of certain activities provided by the Directorate General of Taxes.
139. Contractor of Oil and Gas Cooperation Contract is a business entity or permanent establishment appointed to conduct exploration and exploitation in a working area based on a Cooperation Contract with the implementing agency.
140. Uplift is the fee received by a Contractor in connection with the provision of bailout funds to finance the operation of a production sharing contract which should be the participation obligation of another Contractor in a Cooperation Contract, in the financing.
141. Participating Interest is the rights, interests and obligations of a contractor based on a Cooperation Contract in the oil and gas sector.
142. Exploitation is a series of activities aimed at producing oil and gas from a specified working area, consisting of drilling and completion of wells, construction of means of transport, storage and processing for on-field separation and refining of oil and gas as well as other supporting activities.
143. Exploration is an activity that aims to obtain information on geological conditions to discover and obtain estimates of oil and natural gas reserves in a specified working area.
144. Petty Cash is a working advance of a certain amount granted to the expenditure treasurer to finance daily operational activities of a work unit

or to finance expenses that, according to their characteristics and purpose, are impossible to be conducted through direct payment mechanisms.

145. New Taxpayers are individual Taxpayers and Entities newly registered in a Tax Year, including Taxpayers in the context of mergers, consolidations, spin-offs, acquisitions and/or changes in the form of a business entity.
146. Other Taxpayers that pursuant to statutory provisions are required to prepare periodic financial statements, hereinafter referred to as Other Taxpayers, are Taxpayers implementing activities in the insurance sector, pension funds, financing institutions and other financial services institutions stipulated under statutory provisions.
147. Investment is all forms of investments, either by domestic investors or foreign investors to conduct business in the territory of the Republic of Indonesia.
148. Entrepreneur is an individual or business entity conducting business and/or activities in certain sectors.
149. Company is a domestic limited liability company whose shares are traded by shareholders constituting non-resident Taxpayers and are not of issuer status or public company stipulated under Law Number 8 of 1995 concerning the Capital Market as amended by Law Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector.
150. Insurance Companies are general insurance companies and life insurance companies.
151. Dividends are share of profits received or accrued by shareholders.
152. Working Area is a certain area within the mining jurisdiction of Indonesia for the implementation of exploration and exploitation.
153. Indonesian Crude Price is the price of crude oil set by the government with a formula in the context of the implementation of the oil and/or gas Cooperation Contract as well as the government's share of crude oil sales originating from the implementation of the oil and/or gas Cooperation Contract.
154. Contractor's Overlifting is the excess of oil and/or gas extraction by a Contractor compared to its rights as stipulated in the Cooperation Contract in a certain period.
155. Contractor's Underlifting is the shortfall in oil and/or gas extraction by a Contractor compared to its rights as stipulated in the Cooperation Contract in a certain period.
156. State Revenue Transaction Number is a unique number as a payment/remittance receipt to the State Treasury issued by the settlement system consisting of a combination of letters and numbers.
157. Bank Transaction Number is the number of the state revenue remittance transaction proof issued by a tax payment bank or Foreign Exchange Tax Payment Bank.
158. Operator is a Contractor or in the event that a Contractor consists of several Participating Interest holders, one of the Participating Interest holders that is appointed as a representative by other Participating Interest holders according to the Cooperation Contract.

159. Partner is the Contractor holding Participating Interest in a Working Area and does not act as an Operator.
160. Baggage is Taxable Goods pursuant to statutory provisions that is purchased by a foreign tourist from a retail outlet Taxable Person and brought out of the Customs Territory pursuant to statutory provisions by the party concerned using aircraft transportation modes.
161. Individual Holding Foreign Passport, hereinafter referred to as Foreign Tourist, is an individual who holds a passport issued by another country.
162. Retail Outlet Taxable Person is a Taxable Person supplying Taxable Goods through retail outlets.
163. Airport Value Added Tax Refund Implementing Unit is a special unit of the Tax Office, whose working location includes a place before the check-in counter at the airport and is tasked with processing requests for Value Added Tax refunds for Foreign Tourists.
164. Baggage Inspection Counter, hereinafter referred to as the Inspection Counter, is part of the Airport Value Added Tax Refund Implementing Unit tasked with inspecting Baggage.
165. Value Added Tax Refund Request Form is a form used by a Foreign Tourist to request Value Added Tax refunds of the purchase of Baggage.
166. Assistant Expenditure Treasurer is an employee appointed to assist the expenditure treasurer to implement the payment to those entitled for the smooth implementation of certain activities.
167. Tax Refund Petty Cash Custodian is:
    a. the expenditure treasurer; or
    b. the Assistant Expenditure Treasurer of the Airport Value Added Tax Refund Implementing Unit that conducts the payment of Value Added Tax refunds.
168. Payment Counter is part of the Airport Value Added Tax Refund Implementing Unit tasked with refunding Value Added Tax with a value of less than or equal to IDR5,000,000.00 (five million rupiah) that has been paid by Foreign Tourists.
169. Tax Refund Petty Cash is Petty Cash to pay Value Added Tax refunds for Foreign Tourists.
170. Payment Order Signatory Official is an official authorised by the budget user/proxy of budget user to assess payment requests and issue payment orders.
171. Payment Order for Petty Cash is a document issued by Payment Order Signatory Officials to disburse Petty Cash.
172. Payment Order for Tax Refund Petty Cash is Payment Order for Petty Cash issued to pay Tax Refund Petty Cash.
173. Payment Order for Petty Cash Reimbursement is a document issued by Payment Order Signatory Officials by charging the budget execution document pursuant to statutory provisions, the funds of which are used to reimburse Petty Cash that has been used.
174. Payment Order for Tax Refund Petty Cash Reimbursement is a Payment Order for Petty Cash Reimbursement issued to reimburse Tax Refund Petty Cash that has been used.

175. Expenditure Treasurer is an employee appointed to receive, store, pay, administer and account for the money for state expenditure purposes in the implementation of the State Budget in offices/work units of state ministries/non-ministerial government institutions.
176. Additional Petty Cash is a working advance granted to the Expenditure Treasurer for very urgent needs within 1 (one) month exceeding the Petty Cash ceiling that has been set.
177. Additional Tax Refund Petty Cash is Additional Petty Cash to pay Value Added Tax refunds for Foreign Tourists.
178. Payment Order for Additional Petty Cash is a document issued by Payment Order Signatory Officials to disburse additional Petty Cash.
179. Payment Order for Additional Tax Refund Petty Cash is a Payment Order for Additional Petty Cash issued to pay Additional Tax Refund Petty Cash.
180. Export of Taxable Services is any activity of supply of Taxable Services produced within the Customs Territory to be utilised by recipients of exports of Taxable Services outside the Customs Territory.
181. Reimbursement is the value in money, including all costs that are requested or that should be requested by an Entrepreneur due to a supply of Taxable Services, an Export of Taxable Services or an export of intangible Taxable Goods but excluding Value Added Tax collected pursuant to the Value Added Tax Law and price discounts listed in the Tax Invoice or the value in money that is paid or should be paid by the service recipient due to utilisation of Taxable Services and/or by the beneficiary of intangible Taxable Goods due to utilisation of intangible Taxable Goods from outside the Customs Territory within the Customs Territory.
182. Recipient of Export of Taxable Services is an individual or Entity that enters into a contract and receives direct benefits from the Export of Taxable Services, is outside the Customs Territory and is a non-resident Taxpayer that does not have a permanent establishment in Indonesia stipulated under the Income Tax Law as well as the amendments thereto.
183. Service Recipient is an individual or Entity that receives or should receive a supply of Taxable Services and that pays or should pay for the Reimbursement of the said Taxable Services.
184. Return of Taxable Goods is the return of Taxable Goods, either in part or in full, by the buyer of Taxable Goods.
185. Cancellation of Taxable Services is the cancellation of Taxable Services, either in part or in full, of rights or facilities or concessions by the Service Recipient.
186. Insurance Agent is a person who is self-employed or works for a business entity, acts for and on behalf of an Insurance Company or sharia Insurance Company and fulfils the requirements to represent the Insurance Company or sharia Insurance Company in marketing insurance products or sharia insurance products.
187. Sharia Insurance Companies are sharia general Insurance Companies and sharia life Insurance Companies.
188. Electronic Commerce Merchants are individuals or Entities conducting business activities in the field of Electronic Commerce, consisting of

foreign merchants, foreign service providers, foreign Electronic Commerce operators and/or domestic Electronic Commerce operators.

189. Foreign Merchant is an individual or Entity residing or domiciled outside the Customs Territory conducting transactions with goods beneficiaries within the Customs Territory through an electronic system.
190. Foreign Service Provider is an individual or Entity residing or domiciled outside the Customs Territory conducting transactions with Service beneficiaries within the Customs Territory through an electronic system.
191. Goods Beneficiary is an individual or Entity that receives or should receive a supply of intangible Taxable Goods and that pays or should pay the Reimbursement for intangible Taxable Goods due to the utilisation of intangible Taxable Goods from outside the Customs Territory within the Customs Territory through an electronic system.
192. Service Beneficiary is an individual or Entity that receives or should receive a supply of Taxable Services and that pays or should pay the Reimbursement for Taxable Services due to the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory through an electronic system.
193. Electronic Commerce Operator is an entrepreneur providing electronic communication means used for trade transactions.
194. Domestic Electronic Commerce Operator is an Electronic Commerce Operator residing or domiciled within the Customs Territory.
195. Foreign Electronic Commerce Operator is an Electronic Commerce Operator residing or domiciled outside the Customs Territory.
196. Digital Goods are any intangible goods in the form of Electronic or digital Information, including goods that are the results of conversion or transformation or goods that are originally in the electronic form, including but not limited to software, multimedia and/or electronic data.
197. Patent is an exclusive right granted by the state to an inventor for his/her invention in the field of technology for a certain period to self-implement the invention or grant approval to another party to implement it.
198. Digital Services are services that are sent through the internet or electronic networks, are automated or involve little human intervention and are impossible to ensure without information technology, including but not limited to software-based services.
199. Crypto Assets are intangible commodities that are in the digital form, use cryptography, technology information networks and distributed ledgers, to regulate the creation of new units, verify transactions and secure transactions without interference from other parties.
200. Electronic Means are means of communication through an electronic system used in Crypto Asset trading, which includes statements, declarations, requests, notifications or applications, confirmations, offers or acceptance of offers, which contain the agreement of the parties for the establishment or implementation of the agreement.
201. Crypto Asset Seller is an individual or Entity that sells and/or swap Crypto Assets.

202. Crypto Asset Miner is an individual or Entity that conducts Crypto Asset transaction verification activities to obtain remunerations in the form of Crypto Assets, either individually or in a group of Crypto asset miners (mining pool).
203. Crypto Asset Physical Trader is a party that has obtained approval from the competent authority pursuant to statutory provisions stipulating commodity futures trading, to conduct Crypto Asset transactions, either on their own behalf and/or to facilitate transactions of Crypto Asset Sellers or Crypto Assets buyers.
204. Crypto Asset Buyer is an individual or Entity that receives or should receive a supply of Crypto Assets and pays or should pay the price of the said Crypto Assets.
205. Documents Equivalent to the Unified Withholding Tax/Collection Receipt are documents in the form of paper forms or Electronic Documents that contain data or information on certain Withholding Tax or Income Tax collection equivalent to the unified withholding tax/collection receipt in a standard format.
206. Unified Withholding Tax/Collection Receipt is a document in the standard format or other equivalent documents, prepared by Income Tax withholding/collection agents as proof of Withholding Tax/Income Tax collection that indicates the amount of Income Tax that has been withheld/collected.
207. Certain Business Sectors are business sectors in the economic activity sector that receive high priorities on the national scale.
208. Certain Business Sectors and in Certain Regions are business sectors in the economic activity sector and regions that economically have feasible potentials to be developed that receive high priorities on the national scale.
209. Tangible Fixed Assets are tangible assets that have a useful life of more than 1 (one) year which are acquired in the form of ready-to-use or built and/or assembled in advance, which are used in company operations and are not intended to be sold or transferred.
210. Intangible Assets are intangible assets that have a useful life of more than 1 (one) year which are used in company operations and are not intended to be sold or transferred.
211. Main Business Activity is the business sector and type of production listed in the principle permit, investment permit, Investment registration or business licensing at the time the application for the Corporate Income Tax reduction or Income Tax facility is submitted.
212. Electronically Integrated Business Licensing System (Online Single Submission System), hereinafter referred to as the Online Single Submission System, is an integrated electronic system managed and administered by the Online Single Submission Institution for the administration of risk-based business licensing.
213. Start of Commercial Production is the first time products or Services from the Main Business Activity are sold or supplied or self-used for further production processes.

214. Business Licensing is the legality granted to an Entrepreneur to start and conduct business and/or activities.
215. Research is an activity conducted according to scientific methods to obtain data and information related to the understanding of natural and/or social phenomena, evidencing the correctness or incorrectness of an assumption and/or hypothesis and drawing scientific conclusions.
216. Development is an activity to increase the benefits and supporting capacity of science and technology whose correctness and safety have been proven to increase the functions and benefits of science and technology.
217. Intellectual Property is a property that arises as a result of human thought processing that produces a product or process that is useful for human life.
218. Plant Variety Protection Rights are special rights granted by the state to breeders and/or holders of plant variety protection rights to use their own varieties resulting from their breeding or to grant approval to other persons or legal Entities to use them for a certain period.
219. Commercialisation is a production activity in Indonesia and the sale of goods and/or services resulting from Research and Development.
220. Employer is a legal Entity or other Entities that employ Foreign Nationals by paying wages or remunerations in other forms.
221. Deemed Profit is guidelines to determine net income, prepared and improved continuously as well as issued by the Director General of Taxes as stipulated under Article 14 of the Income Tax Law.
222. Minister is the minister who administers governmental affairs in the field of state finances.

CHAPTER II
SCOPE

Article 2

The scope under this Ministerial Regulation is:

a. procedures for the exercise of tax rights and fulfilment of tax obligations and issuance, signing as well as delivery of decisions and Electronic Documents;
b. procedures for Taxpayer registration, VAT registration and Land and Building Tax Object registration;
c. procedures for the tax payment and remittance, refund of tax overpayments that should not otherwise be payable, interest compensation as well as tax refunds;
d. procedures for the filing and processing of Tax Returns;
e. procedures for the granting of tax administration services;
f. technical provisions on the implementation of the coretax administration system; and
g. sample format of documents and sample calculation, collection and/or filing.

CHAPTER III
PROCEDURES FOR THE EXERCISE OF TAX RIGHTS AND FULFILMENT OF TAX OBLIGATIONS AND ISSUANCE, SIGNING AS WELL AS DELIVERY OF DECISIONS AND ELECTRONIC DOCUMENTS

Article 3

The exercise of tax rights and fulfilment of tax obligations shall be the exercise of tax rights and fulfilment of tax obligations pursuant to statutory provisions in the field of taxation.

Article 4

(1) The exercise of tax rights and fulfilment of tax obligations by Taxpayers shall be implemented electronically.

(2) The electronic exercise of tax rights and fulfilment of tax obligations referred to in paragraph (1) shall be conducted through:
   a. the Taxpayer Portal;
   b. other webpages or applications integrated with the administration system of the Directorate General of Taxes; and/or
   c. the Contact Center.

(3) The electronic exercise of tax rights and fulfilment of tax obligations through the Contact Center referred to in paragraph (2) subparagraph c shall be the exercise of tax rights and fulfilment of tax obligations, the requirements of which may be confirmed in person by the Contact Center officers.

(4) In the event that Taxpayers cannot exercise their rights and fulfil their tax obligations electronically as referred to in paragraph (1), the Taxpayers may exercise their rights and fulfil their tax obligations:
   a. in person; or
   b. by post, forwarding company or courier services,

   to the Tax Office, Tax Services, Dissemination and Consultation Office or other places designated by the Director General of Taxes.

(5) The causes of the exercise of tax rights and fulfilment of tax obligations cannot be implemented by the Taxpayers referred to in paragraph (4) may be in the form of:
   a. infrastructure that is not yet available in the regions where the Taxpayers reside or are domiciled;
   b. the communication system or facilities used by Taxpayers experience technical disruptions; and
   c. there is a disaster.

Article 5

The time for the electronic exercise of tax rights and fulfilment of tax obligations referred to in Article 4 paragraph (1) is conducted according to Western Indonesian Time.

Article 6

(1) For the electronic exercise of tax rights and fulfilment of tax obligations through the Taxpayer Portal referred to in Article 4 paragraph (2) subparagraph a, the Director General of Taxes provides a Taxpayer Account for each Taxpayer.
(2) The Taxpayer Account referred to in paragraph (1) may be used by a Taxpayer by activating the Taxpayer Account.
(3) The application for the activation of the Taxpayer Account referred to in paragraph (2) is submitted:
    a. electronically through the Taxpayer Portal; or
    b. in person to the Tax Office or Tax Services, Dissemination and Consultation Office.
(4) The application for the activation of the Taxpayer Account referred to in paragraph (2) may be approved insofar as the Taxpayer's electronic mail address and mobile telephone number have been validated.

Article 7

(1) Documents used in the exercise of tax rights and fulfilment of tax obligations referred to in Article 3 are submitted by a Taxpayer in the form of Electronic Documents for the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 paragraph (1) or paper documents for the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 paragraph (4).
(2) In the event that the exercise of tax rights and fulfilment of tax obligations referred to in Article 3 are conducted by the Taxpayer’s attorney, the documents referred to in paragraph (1) must be attached with a special power of attorney stipulated under statutory laws and regulations in the field of taxation.
(3) For the submission of the documents referred to in paragraph (1), proof of receipt is issued in the event that the documents have been completely received by the Director General of Taxes.
(4) The date listed in the proof of receipt is the date the documents are received.
(5) Excluded from the provisions referred to in paragraph (3) and paragraph (4), the receipt and mailing date of the letter are the receipt and date of receipt of the submission of paper documents by post, forwarding services or courier services referred to in Article 4 paragraph (4) subparagraph b related to the exercise of tax rights and fulfilment of tax obligations in the form of:
    a. the filing of Tax Returns stipulated under Article 6 paragraph (2) of the General Provisions and Tax Procedures Law;
    b. the application for amendment stipulated under Article 16 paragraph (1) of the General Provisions and Tax Procedures Law;
    c. the filing of objections stipulated under Article 25 paragraph (1) of the General Provisions and Tax Procedures Law and Article 15 of the Land and Building Tax Law;

d. the application for the reduction or nullification of administrative penalties stipulated under Article 36 paragraph (1) subparagraph a of the General Provisions and Tax Procedures Law;
e. the application for the reduction or cancellation of an incorrect Notice of Tax Assessment stipulated under Article 36 paragraph (1) subparagraph b of the General Provisions and Tax Procedures Law;
f. the application for the reduction or cancellation of an incorrect Notice of Tax Collection stipulated under Article 36 paragraph (1) subparagraph c of the General Provisions and Tax Procedures Law;
g. the application for the cancellation of the Notice of Tax Assessment resulting from an Audit stipulated under Article 36 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law;
h. the submission of the Notice of Taxable Objects stipulated under Article 9 paragraph (2) of the Land and Building Tax Law;
i. the application for the reduction of Land and Building Tax stipulated under Article 19 paragraph (1) of the Land and Building Tax Law; and
j. the request for the reduction of land and building tax administrative fines stipulated under Article 20 of the Land and Building Tax Law.

(6) In the event that a Taxpayer submits the same Electronic Documents and/or paper documents for the same exercise of tax rights and fulfilment of tax obligations, the documents recognised as the exercise of tax rights and fulfilment of tax obligations are the documents first recorded in the administration system of the Directorate General of Taxes.
(7) The proof of receipt or proof of postage for the documents first recorded in the administration system of the Directorate General of Taxes referred to in paragraph (6) constitutes proof of receipt of the documents.
(8) The date listed in the proof of receipt of the documents referred to in paragraph (7) is the date the documents are received by the Directorate General of Taxes.
(9) Documents for which the proof of receipt referred to in paragraph (3), paragraph (5) and paragraph (7) has been issued are followed up by:
a. the administration system of the Directorate General of Taxes or a system integrated with the administration system of the Directorate General of Taxes;
b. officials or employees of the Directorate General of Taxes; or
c. officials or employees of the competent ministries or institutions pursuant to statutory provisions.

Article 8

(1) The signing of Electronic Documents referred to in Article 7 paragraph (1) which must be signed by the Taxpayer pursuant to statutory laws and regulations in the field of taxation, is implemented using an Electronic Signature.
(2) Electronic Signatures include:
a. certified Electronic Signatures; and
b. uncertified Electronic Signatures,

stipulated under the Government Regulation concerning the administration of electronic systems and transactions.

(3) The certified Electronic Signature referred to in paragraph (2) subparagraph a is an Electronic Signature created using an Electronic Certificate issued by:
   a. agency Electronic Certification Providers, for Government Agency Taxpayers represented by civil servants, the Indonesian National Armed Forces and Indonesian National Police in exercising tax rights and fulfilling tax obligations electronically; or
   b. non-agency Electronic Certification Providers in the event that the Taxpayers are Taxpayers other than those referred to in subparagraph a.

(4) Electronic Certification Providers are Electronic Certification Providers that:
   a. have been recognised by the ministry that administers governmental affairs in the field of communications and informatics; and
   b. are appointed by the Minister.

(5) An uncertified Electronic Signature is an Electronic Signature created using an Authorisation Code.

(6) The Director General of Taxes issues the Authorisation Code simultaneously with the approval and activation of the Taxpayer Account.

(7) Electronic Documents submitted through the Contact Center referred to in Article 4 paragraph (2) subparagraph c, are deemed to have been signed after the Taxpayer answers the identity validation questions and submit the affirmation to the Contact Center officers.

Article 9

(1) To obtain the Electronic Certificate referred to in Article 8 paragraph (3), the Taxpayer must apply for the issuance of an Electronic Certificate to the Electronic Certification Provider referred to in Article 8 paragraph (4).

(2) Procedures for the submission of the application for the issuance and validity period of the Electronic Certificate shall comply with the provisions stipulated by the Electronic Certification Providers.

Article 10

(1) The signing of Electronic Documents referred to in Article 8 paragraph (1) for an individual Taxpayer is conducted using an Electronic Certificate or Authorisation Code owned by:
   a. the individual Taxpayer concerned;
   b. the custodian or guardian, for minors or persons under guardianship; or
   c. an individual appointed by the individual Taxpayer pursuant to statutory provisions to sign Electronic Documents.

(2) The signing of Electronic Documents referred to in Article 8 paragraph (1) for Corporate Taxpayers, Government Agency Taxpayers and Undivided Inheritance Taxpayers is conducted using an Electronic Certificate or Authorisation Code owned by:

a. an individual constituting the Taxpayer's representative; or
b. an individual other than the Taxpayer's representative appointed by the Taxpayer's representative pursuant to statutory provisions to sign the Electronic Documents.

(3) The Taxpayer's representative referred to in paragraph (2) is:
a. the management, for Corporate Taxpayers;
b. the curator, for Corporate Taxpayers declared bankrupt;
c. a person or individual representing the Entity assigned to conduct settlements for Corporate Taxpayers in dissolution;
d. the liquidator, for Corporate Taxpayers in liquidation;
e. one of the heirs/heiresses, executor of the will or trustee, for Undivided Inheritance Taxpayers;
f. the head of the Central Government Agency, proxy of budget user, head of public service agency or official implementing the financial administration function of the Central Government Agency, for Central Government Agencies;
g. the head of the budget user Local Government Agency, head of local public service agency or official implementing the financial administration function of local government work units, for Local Government Agencies; or
h. the village head or village officials implementing the village financial management based on the village head's decision, for Village Government Agencies.

(4) In the event that a Taxpayer appoints an attorney, the Taxpayer's attorney signs the Electronic Documents using an Electronic Certificate or Authorisation Code owned by the Taxpayer's attorney.

(5) Electronic Documents have the same legal force as paper documents.

Article 11

(1) The Minister, the Director General of Taxes and certain officials within the Directorate General of Taxes authorised pursuant to statutory laws and regulations in the field of taxation may issue decisions in the electronic format and Electronic Documents.

(2) The decisions in the electronic format referred to in paragraph (1) may be in the form of the:
a. Notice of Tax Collection;
b. Notice of Tax Underpayment Assessment;
c. Notice of Additional Tax Underpayment Assessment;
d. Notice of Nil Tax Assessment;
e. Notice of Tax Overpayment Assessment;
f. Notice of Land and Building Tax Assessment;
g. Notice of Land and Building Tax Collection;
h. Amendment Decision Letter;
i Mutual Agreement Decision Letter;
j. Objection Decision Letter;
k. Administrative Penalty Reduction Decision Letter;
l. Administrative Penalty Nullification Decision Letter;

m. Land and Building Tax Reduction Decision Letter;
n. Land and Building Tax Administrative Fine Reduction Decision Letter;
o. Tax Assessment Reduction Decision Letter, including the reduction of the Notice of Tax Due or Notice of Land and Building Tax Assessment;
p. Tax Assessment Cancellation Decision Letter, including the cancellation of the Notice of Tax Due, Notice of Land and Building Tax Assessment or Notice of Land and Building Tax Collection;
q. Preliminary Tax Refund Decision Letter;
r. Interest Compensation Decision Letter;
s. Tax Refund Decision Letter;
t. Interest Compensation Calculation Decision Letter;
u. Notice of Tax Due;
v. Advance Pricing Agreement Enactment Decision Letter;
w. notice;
x. reprimand letter;
y. warning letter;
z. certificate;
aa. approval letter; and
bb. rejection letter.

(3) Decisions in the electronic format are granted:
a. a certified Electronic Signature; or
b. a certified Electronic Seal.

(4) The Electronic Signature and Electronic Seal referred to in paragraph (3) are certified Electronic Signature and Electronic Seal created using the Electronic Certificate issued by the agency Electronic Certification Provider.

(5) In the event that the issuance of the decision is processed by the administration system of the Directorate General of Taxes or a system integrated with the administration system of the Directorate General of Taxes, the signing is conducted using an Electronic Seal.

(6) In addition to the decisions referred to in paragraph (2), the Electronic Signature and Electronic Seal referred to in paragraph (3) may be used to sign Electronic Documents in the implementation of statutory provisions in the field of taxation, which may be in the form of the:
a. request letter;
b. invitation letter;
c. official report;
d. minutes; and
e. calculation memo.

(7) The decisions referred to in paragraph (2) or Electronic Documents referred to in paragraph (6) containing the amount of outstanding tax or tax that is overpaid or should not otherwise be payable, are prepared with the following provisions:
a. in the event that taxes are calculated using rupiah, the decisions or Electronic Documents are prepared in full rupiah rounded down; or

b. in the event that taxes are calculated using United States dollars, the decisions or Electronic Documents are prepared in United States dollars rounded down to 2 (two) decimal places.

(8) The decisions referred to in paragraph (2) and Electronic Documents referred to in paragraph (6) have the same legal force as decisions and documents in the form of paper.

(9) In the event that decisions and documents are issued in the electronic format, the decisions and documents are not issued in the form of paper.

Article 12

(1) The Director General of Taxes delivers the decisions referred to in Article 11 paragraph (2) and Electronic Documents referred to in Article 11 paragraph (6) to Taxpayers in the electronic format through the Taxpayer Account and/or the Taxpayer's electronic mail registered in the administration system of the Directorate General of Taxes, except for decisions and Electronic Documents that must be delivered by the Director General of Taxes in the form of paper pursuant to statutory provisions in the field of taxation.

(2) In the event of a request from the Taxpayer or based on the considerations from the Director General of Taxes, the Director General of Taxes may deliver the printout of the decisions in the electronic format and Electronic Documents referred to in paragraph (1):
   a. in person;
   b. by facsimile with proof of facsimile delivery; or
   c. by post, forwarding services or courier services with proof of postage.

(3) The time of the delivery of the decisions in the electronic format and Electronic Documents referred to in paragraph (1) uses the Western Indonesian Time standard.

(4) The date of delivery of the decisions and Electronic Documents referred to in paragraph (1) through the Taxpayer Account or Taxpayer's electronic mail also constitutes the date the decisions in the electronic format and Electronic Documents are delivered by the Director General of Taxes and the date the decisions and Electronic Documents are received by the Taxpayer.

(5) The date of delivery of the decisions and Electronic Documents in the form of printout referred to in paragraph (2) by the Director General of Taxes and the date of receipt by the Taxpayer is the date:
   a. the decisions are submitted or received, if delivered in person;
   b. proof of facsimile delivery, if delivered by facsimile; or
   c. proof of postage, if delivered by post, forwarding services or courier services.

(6) In the event that a decision or Electronic Documents are submitted through more than 1 (one) submission channel, the date of delivery by the Director General of Taxes and the date of receipt by the Taxpayer that apply are:

a. in the event that the Taxpayer has granted the approval to use the Taxpayer Account as a means of receiving tax decisions and documents, the date of delivery to the Taxpayer Account; or
b. in the event that the Taxpayer has not granted the approval to use the Taxpayer Account, the earliest of the following dates:
   1. the date of delivery through the Taxpayer's electronic mail registered in the administration system of the Directorate General of Taxes;
   2. the date of in-person submission;
   3. the facsimile delivery date; or
   4. the date of delivery listed on the proof of postage.

(7) The approval to use the Taxpayer Account as a means of receiving tax decisions and documents referred to in paragraph (6) is conducted electronically at the time of Taxpayer activation.

Article 13

(1) The Minister may cooperate with Government Agencies, institutions, associations and other parties to provide facilities for the electronic exercise of tax rights and/or fulfilment of tax obligations, through an administration system integrated with the system of the Directorate General of Taxes.
(2) The cooperation referred to in paragraph (1) may be in the form of:
   a. the granting of a Taxpayer Identification Number;
   b. the granting of the confirmation of the Taxpayer's status;
   c. the administration of electronic withholding receipts and electronic Tax Invoices; and
   d. the administration of tax payments and/or electronic Tax Return filing.
(3) The cooperation referred to in paragraph (2) may be implemented through a cooperation agreement or appointment.

Article 14

(1) The Minister may delegate authority in the form of delegation to appoint the Electronic Certification Providers referred to in Article 8 paragraph (4) subparagraph b to the Director General of Taxes.
(2) The Minister may delegate authority in the form of delegation to the Director General of Taxes to enter into and implement the cooperation agreement and appointment referred to in Article 13 paragraph (3).
(3) The Minister may delegate authority in the form of delegation or mandate to issue decisions to:
   a. officials or employees within the Directorate General of Taxes; and
   b. ministers or heads of other institutions.
(4) The Director General of Taxes may delegate authority in the form of delegation or mandate to issue decisions to officials or employees within the Directorate General of Taxes.

CHAPTER IV
PROCEDURES FOR TAXPAYER REGISTRATION, VAT REGISTRATION AND LAND AND BUILDING TAX OBJECT REGISTRATION

Section One
Procedures for Taxpayer Registration

Article 15

(1) Every Taxpayer that has fulfilled the subjective and objective requirements is required to register with the Tax Office whose working area covers the Taxpayer's residence or the Taxpayer's domicile.
(2) The Director General of Taxes is authorised to determine:
    a. the residence of an individual Taxpayer or the domicile of a Corporate Taxpayer, in the event that an individual or Entity has more than one residence or domicile;
    b. the place of registration for a Taxpayer with certain criteria in a certain Tax Office; and
    c. a certain place of registration as the Taxpayer's place of registration.
(3) A Taxpayer that has registered referred to in paragraph (1) is granted a Taxpayer Identification Number.
(4) The subjective requirements referred to in paragraph (1) are requirements that comply with the provisions on tax subjects under the Income Tax Law.
(5) The objective requirements referred to in paragraph (1) are requirements for tax subjects that receive or accrue income or are required to perform withholding and/or collection pursuant to the provisions under the Income Tax Law.
(6) The Taxpayers referred to in paragraph (1) include:
    a. individual Taxpayers;
    b. Undivided Inheritance Taxpayers;
    c. Corporate Taxpayers; and
    d. Government Agencies appointed as withholding and/or collection agents pursuant to statutory provisions in the field of taxation.
(7) Taxpayers that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 16

(1) The individual Taxpayers referred to in Article 15 paragraph (6) subparagraph a are required to register with the Tax Office whose working area covers the Taxpayers' residence, and they are granted a Taxpayer Identification Number.
(2) The granted Taxpayer Identification Number referred to in paragraph (1) is in the form of:
    a. the National Identification Number that has been activated as the Taxpayer Identification Number in tax administration, for individual Taxpayers constituting Residents; and

b. a number in the 16 (sixteen) digit format generated by the administration system of the Directorate General of Taxes as a Taxpayer Identification Number, for individual Taxpayers not constituting Residents.

(3) The individual Taxpayers referred to in paragraph (1) include individual Taxpayers constituting Residents and non-Residents who:
a. conduct business activities or independent personal services, including Certain Entrepreneur Individual Taxpayers; and
b. do not conduct business activities or independent personal services and receive or accrue income above the personal tax relief.

(4) The Certain Entrepreneur Individual Taxpayer referred to in paragraph (3) subparagraph a is required to report his/her place of business to the Tax Office where the individual Taxpayer is registered to obtain a Place of Business Identification Number for each place of business.

(5) The obligation to register referred to in paragraph (1) also applies to a married woman who is taxed separately because she:
a. lives in separation based on a judge's decision;
b. desires in writing based on an income and asset separation agreement; or
c. chooses to exercise her tax rights and fulfil tax obligations separately from her husband's tax rights and tax obligations.

(6) An individual who:
a. has not fulfilled the objective requirements as a Taxpayer;
b. does not fulfil the subjective requirements as a tax resident; or
c. is not included in tax subjects pursuant to statutory provisions in the field of Income Tax,

may be granted a tax identification number in the form of a Taxpayer Identification Number for tax administration purposes.

(7) The individual who has not fulfilled the objective requirements referred to in paragraph (6) subparagraph a registers with the Tax Office whose working area covers the individual's residence.

(8) The individual who does not fulfil the subjective requirements as a tax resident and is not included in tax subjects referred to in paragraph (6) subparagraph b and subparagraph c is administered at the Tax Office designated by the Director General of Taxes.

Article 17

(1) An individual Taxpayer who conducts business activities or independent personal services, including Certain Entrepreneur Individual Taxpayers referred to in Article 16 paragraph (3) subparagraph a, shall be required to register no later than 1 (one) month after the business activities or independent personal services start to be conducted.

(2) An individual Taxpayer who does not conduct business activities or independent personal services and receives or accrues income above the personal tax relief referred to in Article 16 paragraph (3) subparagraph b, is required to register no later than the end of the following month after

the receipt of income which causes the accumulated income in the current Tax Year to be the equal to or exceed the personal tax relief.

Article 18

(1) The individual Taxpayer referred to in Article 17 paragraph (2) constituting a Resident and receives or accrues income with an accumulation that has not exceeded the personal tax relief, the individual concerned uses a validated National Identification Number as the tax identity referred to in Article 16 paragraph (6) subparagraph a.
(2) The individual Taxpayer referred to in Article 17 paragraph (2) not constituting a Resident and receives or accrues income with an accumulation that has not exceeded the personal tax relief, the individual concerned uses a tax identification number in the 16 (sixteen) digit format after registering his/her identity with the tax administration referred to in Article 16 paragraph (6) subparagraph a.

Article 19

The individual Taxpayer registration referred to in Article 16 is conducted by submitting an application implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 20

(1) For the individual Taxpayer constituting a Resident referred to in Article 16 paragraph (3), the application for Taxpayer registration is submitted by completing the Taxpayer registration application form.
(2) For the individual Taxpayer not constituting a Resident referred to in Article 16 paragraph (3), the application for Taxpayer registration is submitted by completing the registration application form and attaching the following documents:
    a. a copy of the passport;
    b. a colour passport photo of the Taxpayer concerned; and
    c. a colour passport photo of the Taxpayer concerned holding the passport.

Article 21

Based on the application for the individual Taxpayer registration referred to in Article 19, the Head of the Tax Office issues a Taxpayer Identification Number no later than 1 (one) business day after the application is completely received.

Article 22

(1) In the event that an individual Taxpayer does not implement the obligations referred to in Article 17, the Head of the Tax Office may issue a Taxpayer Identification Number *ex officio*.
(2) The *ex officio* issuance of the Taxpayer Identification Number referred to in paragraph (1) is conducted based on the results of administrative examination according to data and/or information held or obtained by the Directorate General of Taxes, including data and/or information obtained from extensification activities.

Article 23

(1) The Head of the Tax Office, based on the application by an individual Taxpayer or *ex officio*, may change the individual Taxpayer data in the event that the data and/or information contained in the tax administration differs from the actual circumstances.
(2) The application for changes in the individual Taxpayer data referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating changes in the individual Taxpayer data.
(3) After examining the application for changes in the individual Taxpayer data referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the individual Taxpayer.
(4) The decision referred to in paragraph (3) is issued no later than 1 (one) business day after the application is completely received.

Article 24

(1) In addition to in the event that the data and/or information contained in the tax administration differs from the actual circumstances as referred to in Article 23 paragraph (1), changes in the individual Taxpayer data are conducted in the event of changes in the individual Taxpayer's residential address resulting in a change in the working area of the Tax Office where the Taxpayer is registered.
(2) After examining the application for the transfer of the place where the individual Taxpayer is registered referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the individual Taxpayer.
(3) The decision referred to in paragraph (2) is issued no later than 5 (five) business days after the application is completely received.

Article 25

(1) The Head of the Tax Office, based on the application by an individual Taxpayer or *ex officio*, may determine an individual Taxpayer as a Non-active Taxpayer.
(2) The determination of the Non-active Taxpayer referred to in paragraph (1) is conducted in the event that the individual Taxpayer:
    a. conducts business activities or independent personal services but does not fulfil the objective requirements because he/she terminates his/her business or independent personal services;
    b. does not conduct business activities or independent personal services but does not fulfil the objective requirements because he/she has yet to or does not derive income or has income below the personal tax relief;
    c. is an Indonesian Citizen of Resident status intending to become a non-tax resident but has not fulfilled the requirements as a non-tax resident;
    d. is an Indonesian Citizen of Resident status who no longer fulfils the subjective and objective requirements;

e. is a married woman who already has a Taxpayer Identification Number who subsequently chooses to exercise her tax rights and fulfil her tax obligations together with her husband; or
f. fulfils certain criteria determined by the Director General of Taxes.

(3) The application for the determination of the Non-active Taxpayer referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating that the individual Taxpayer fulfils the criteria for Non-active Taxpayers.

(4) After examining the application for the determination of the Non-active Taxpayer referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the individual Taxpayer.

(5) The decision referred to in paragraph (4) is issued no later than 5 (five) business days after the application is completely received.

(6) In the event that individual Taxpayers no longer fulfil the criteria referred to in paragraph (2), the Head of the Tax Office, based on the application by the individual Taxpayers or *ex officio*, may reactivate non-active Taxpayers.

Article 26

(1) The individual Taxpayer referred to in Article 25 paragraph (2) subparagraph d who:
a. fulfils the requirements for the determination of the status of an Indonesian Citizen as a non-tax resident, the decision referred to in Article 25 paragraph (4) is issued on the determination of the Taxpayer as a Non-active Taxpayer as a replacement for the Certificate of Indonesian Citizens Fulfilling the Requirements to Become Non-Tax Residents; or
b. does not fulfil the requirements for the determination of the status of an Indonesian Citizen as a non-tax resident, the decision referred to in Article 25 paragraph (4) is issued on the rejection of the determination of the Taxpayer as a Non-active Taxpayer as a replacement for the rejection letter for the application for the determination of the status of an Indonesian Citizen as a non-tax resident,

stipulated under the Minister of Finance Regulation concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures.

(2) The requirements and procedures for the settlement of the application for the determination of the status of an Indonesian Citizen as a non-tax resident referred to in paragraph (1) other than concerning the settlement period, are implemented pursuant to the provisions under the Minister of Finance Regulation concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures.

Article 27

In the event that the individual Taxpayer referred to in Article 25 paragraph (2) subparagraph c in the future, does not fulfil the requirements or does not apply to obtain a Certificate of Indonesian Citizens Fulfilling the Requirements to Become Non-Tax Residents, for the individual Taxpayer concerned:

a. the determination as a Non-active Taxpayer becomes void;
b. remains a tax resident; and
c. is subject to taxes pursuant to statutory provisions in the field of taxation applicable to tax residents.

Article 28

(1) The Head of the Tax Office, based on the application by an individual Taxpayer or *ex officio*, may perform Taxpayer Identification Number Deregistration for individual Taxpayers who no longer fulfil the subjective and/or objective requirements pursuant to statutory provisions in the field of taxation.
(2) The Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted in the event that:
    a. the individual Taxpayer has passed away and left no inheritance;
    b. the individual Taxpayer:
        1. has left Indonesia permanently and no longer has the status of a Resident, for individuals who formerly had the status of Residents; or
        2. has left Indonesia permanently, for individuals who do not have the status of Residents; or
    c. the individual Taxpayer has more than 1 (one) Taxpayer Identification Number.

Article 29

(1) The application for Taxpayer Identification Number Deregistration referred to in Article 28 paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with the required documents.
(2) The required documents as attachments to the application for Taxpayer Identification Number Deregistration referred to in paragraph (1) are supporting documents which indicate that the individual Taxpayer no longer fulfils the subjective and/or objective requirements, in the form of:
    a. for the individual Taxpayer referred to in Article 28 paragraph (2) subparagraph a, namely the documents indicating that the individual Taxpayer has passed away as well as a statement that he/she has no inheritance or a statement letter that the inheritance has been divided by mentioning the heirs/heiresses;
    b. for the individual Taxpayer who formerly had the status of a Resident referred to in Article 28 paragraph (2) subparagraph b number 1:
        1. documents stating that the individual Taxpayer has left Indonesia permanently; and/or

2. documents indicating that the individual Taxpayer constituting a Resident as an Indonesian Citizen no longer has the status of a Resident due to the loss of Indonesian citizenship pursuant to statutory provisions in the field of population; and

c. for the individual Taxpayer not constituting a Resident referred to in Article 28 paragraph (2) subparagraph b number 2, namely documents stating that the Taxpayer has left Indonesia permanently.

(3) The Taxpayer Identification Number Deregistration based on the application by the individual Taxpayer referred to in paragraph (1) is conducted based on Audit findings.

(4) Based on Audit findings referred to in paragraph (3), the Head of the Tax Office issues a decision on the application for Taxpayer Identification Number Deregistration no later than 6 (six) months from the date the application by the individual Taxpayer is completely received.

(5) If the period referred to in paragraph (4) has elapsed and the Head of the Tax Office does not issue a decision, the application by the individual Taxpayer is deemed granted and the Head of the Tax Office must issue a Taxpayer Identification Number Deregistration decision letter no later than 1 (one) month after the period referred to in paragraph (4) ends.

Article 30

(1) The *ex officio* Taxpayer Identification Number Deregistration referred to in Article 28 paragraph (1) is conducted by the Head of the Tax Office based on tax data and/or information held or obtained by the Directorate General of Taxes.

(2) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted based on Audit findings.

(3) In addition to being conducted based on Audit findings referred to in paragraph (2), the Head of the Tax Office may also perform *ex officio* Taxpayer Identification Number Deregistration based on the results of the administrative examination of:

a. the individual Taxpayer has passed away and left no inheritance;

b. the individual Taxpayer has more than 1 (one) Taxpayer Identification Number; or

c. the individual Taxpayer with certain criteria determined by the Director General of Taxes.

(4) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted by issuing a decision on the Taxpayer Identification Number Deregistration.

Article 31

In addition to taking into account the fulfilment of subjective and/or objective requirements referred to in Article 28 paragraph (1), the Taxpayer Identification Number Deregistration is performed insofar as the individual Taxpayer fulfils the following provisions:

a. having no Tax Liability;

b. not currently subject to:

1. an Audit to assess compliance with the fulfilment of tax obligations;
2. a preliminary audit;
3. a tax crime investigation; or
4. a tax crime prosecution;

c. not currently in the process of completing the Mutual Agreement Procedure;

d. not currently in the process of completing an advance pricing agreement; and

e. not currently in the process of completing administrative remedies and legal remedies, in the form of:
1. amendments as stipulated under Article 16 of the General Provisions and Tax Procedures Law;
2. the filing of an objection;
3. Land and Building Tax reduction;
4. the reduction or nullification of administrative penalties;
5. the reduction of Land and Building Tax administrative fines;
6. the reduction cancellation of an incorrect Notice of Tax Assessment;
7. the reduction or cancellation of an incorrect Notice of Tax Due or Notice of Land and Building Tax Assessment;
8. the reduction or cancellation of an incorrect Notice of Tax Collection;
9. the cancellation of an incorrect Notice of Land and Building Tax Collection;
10. the cancellation of tax audit findings or notice of tax assessment from audit findings;
11. a lawsuit;
12. an appeal; and/or
13. a civil review.

Article 32

(1) The exercise of tax rights and fulfilment of tax obligations of an Undivided Inheritance Taxpayer shall use the Taxpayer Identification Number of the individual Taxpayer leaving the inheritance.

(2) In the event that the individual Taxpayer leaving the inheritance referred to in paragraph (1) does not yet have a Taxpayer Identification Number and from the inheritance, income is received or accrued, the representative of the Undivided Inheritance Taxpayer is required to register the Undivided Inheritance in the Tax Office whose working area covers the residence of the individual leaving the inheritance to obtain a Taxpayer Identification Number.

(3) The representative of the Undivided Inheritance Taxpayer referred to in paragraph (2) is required to report the place of business of the Undivided Inheritance to the Tax Office where the Taxpayer is registered to obtain a Place of Business Identification Number for each place of business.

(4) The registration by the representative referred to in paragraph (2) is conducted no later than the end of the following month after the individual Taxpayer leaving the inheritance passes away.

(5) The representative referred to in paragraph (2) is:

a. one of the heirs/heiresses;
b. the executor of the will; or
c. the trustee,

of the individual Taxpayer leaving the inheritance.

(6) The representative referred to in paragraph (5) shall exercise the tax rights and tax obligations of the Undivided Inheritance Taxpayer.

Article 33

(1) The registration referred to in Article 32 paragraph (2) is conducted by submitting an application implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.
(2) Based on the application for registration referred to in paragraph (1), the Head of the Tax Office issues a Taxpayer Identification Number no later than 1 (one) business day after the application by the Undivided Inheritance Taxpayer is completely received.

Article 34

(1) In the event that the representative referred to in Article 32 paragraph (2) does not implement the obligation referred to in Article 32 paragraph (4), the Head of the Tax Office may issue a Taxpayer Identification Number *ex officio* for the Undivided Inheritance Taxpayer.
(2) The *ex officio* issuance of the Taxpayer Identification Number referred to in paragraph (1) is conducted based on the results of the administrative examination according to data and/or information held or obtained by the Directorate General of Taxes, including data and/or information obtained from extensification activities.

Article 35

(1) The Head of the Tax Office based on the application by an Undivided Inheritance Taxpayer or *ex officio* may change the Undivided Inheritance Taxpayer data, in the event that:
   a. the data and/or information contained in the tax administration differs from the actual circumstances; and
   b. the changes in data concerned do not result in the transfer of the place where the Undivided Inheritance Taxpayer is registered.
(2) The application for changes in the Undivided Inheritance Taxpayer data referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating changes in the Undivided Inheritance Taxpayer data.
(3) After examining the application for changes in the Undivided Inheritance Taxpayer data referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Undivided Inheritance Taxpayer.
(4) The decision referred to in paragraph (3) is issued no later than 1 (one) business day after the application is completely received.

Article 36

(1) The Head of the Tax Office based on the application by an Undivided Inheritance Taxpayer or *ex officio* may perform Taxpayer Identification Number Deregistration for the Undivided Inheritance Taxpayer that no longer fulfils the subjective and/or objective requirements pursuant to statutory provisions in the field of taxation.
(2) The Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted in the event that the inheritance has been divided.
(3) The application for Taxpayer Identification Number Deregistration referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating that the inheritance has been divided to all heirs/heiresses.
(4) The Taxpayer Identification Number Deregistration based on the application by the Undivided Inheritance Taxpayer referred to in paragraph (1) is conducted based on Audit findings.
(5) Based on the Audit findings referred to in paragraph (4), the Head of the Tax Office issues the decision on the application for Taxpayer Identification Number Deregistration for the Undivided Inheritance Taxpayer no later than 6 (six) months from the date the application by the Undivided Inheritance Taxpayer is completely received.
(6) If the period referred to in paragraph (5) has elapsed and the Head of the Tax Office does not issue a decision, the application by the Undivided Inheritance Taxpayers is deemed granted and the Head of the Tax Office must issue the Taxpayer Identification Number Deregistration decision letter no later than 1 (one) month after the period referred to in paragraph (4) ends.

Article 37

(1) The *ex officio* Taxpayer Identification Number Deregistration referred to in Article 36 paragraph (1) is conducted by the Head of the Tax Office based on tax data and/or information held or obtained by the Directorate General of Taxes.
(2) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted based on Audit findings.
(3) In addition to being conducted based on Audit findings referred to in paragraph (2), the Head of the Tax Office may also perform *ex officio* Taxpayer Identification Number Deregistration based on the results of the administrative examination of Undivided Inheritance Taxpayers that fulfil certain criteria.
(4) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted through the issuance of the decision on Taxpayer Identification Number Deregistration.

Article 38

In addition to taking into account the fulfilment of subjective and/or objective requirements referred to in Article 36 paragraph (1), Taxpayer Identification Number Deregistration is conducted insofar as an Undivided Inheritance Taxpayer fulfils the following provisions:

a. having no Tax Liability;
b. not currently subject to:
    1. an Audit to assess compliance with the fulfilment of tax obligations;
    2. a preliminary audit;
    3. a tax crime investigation; or
    4. a tax crime prosecution;
c. not currently in the process of completing the Mutual Agreement Procedure;
d. not currently in the process of completing an advance pricing agreement; and
e. not currently in the process of completing administrative remedies and legal remedies, in the form of:
    1. amendments as stipulated under Article 16 of the General Provisions and Tax Procedures Law;
    2. filing an objection;
    3. the reduction of Land and Building Tax;
    4. the reduction of or the nullification of administrative penalties;
    5. the reduction of Land and Building Tax administrative fines;
    6. the reduction or cancellation of an incorrect Notice of Tax Assessment;
    7. the reduction or cancellation of an incorrect Notice of Tax Due or Notice of Land and Building Tax Assessment;
    8. the reduction or cancellation of an incorrect Notice of Tax Collection;
    9. the cancellation of an incorrect Notice of Land and Building Tax Collection;
    10. the cancellation of tax audit findings or notice of tax assessment based on audit findings;
    11. a lawsuit;
    12. an appeal; and/or
    13. a civil review.

Article 39

(1) The Corporate Taxpayers referred to in Article 15 paragraph (6) subparagraph c are required to register with the Tax Office whose working area covers the Taxpayers' domicile.
(2) The Corporate Taxpayers referred to in paragraph (1) include:
    a. Corporate Taxpayers that have tax obligations as taxpayers, withholding and/or collection agents; and
    b. Corporate Taxpayers that only have tax obligations as withholding and/or collection agents.

(3) The Corporate Taxpayers referred to in paragraph (2) are required to report their place of business to the Tax Office where the Taxpayers are registered to obtain a Place of Business Identification Number for every place of business.
(4) Entities that:
    a. do not fulfil the subjective requirements as tax residents; or
    b. are not included in tax subjects pursuant to the provisions under Article 3 of the Income Tax Law,

    may be granted a tax identification number in the form of a Taxpayer Identification Number for tax administration purposes.
(5) The Entities referred to in paragraph (4) are administered at the Tax Office determined by the Director General of Taxes.

Article 40

The Corporate Taxpayers referred to in Article 39 paragraph (1), are required to register to obtain a Taxpayer Identification Number no later than 1 (one) month after the time of being incorporated or domiciled in Indonesia.

Article 41

(1) The Corporate Taxpayer registration referred to in Article 39 paragraph (1) is conducted by submitting an application pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with the required documents.
(2) The required documents referred to in paragraph (1) are in the form of documents indicating the incorporation or establishment of the Entity and the amendments thereto.
(3) Based on the application for registration referred to in paragraph (1), the Head of the Tax Office issues a Taxpayer Identification Number no later than 1 (one) business day after the application is completely received.

Article 42

(1) In the event that a Corporate Taxpayer does not implement the obligation referred to in Article 39 paragraph (1), the Head of the Tax Office may issue a Taxpayer Identification Number *ex officio*.
(2) The *ex officio* issuance of Taxpayer Identification Number referred to in paragraph (1) is conducted based on the results of the administrative examination according to the data and/or information held or obtained by the Directorate General of Taxes, including data and/or information obtained from extensification activities.

Article 43

(1) The Head of the Tax Office based on the application by a Corporate Taxpayer or *ex officio* may change the Corporate Taxpayer data in the event that the data and/or information contained in the tax administration differs from the actual circumstances.
(2) The application for the changes in the Corporate Taxpayer data referred to in paragraph (1) is submitted by submitting an application pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations

referred to in Article 4 as well as attached with documents indicating the changes in Corporate Taxpayer data.

(3) After examining the application for changes in the Corporate Taxpayer data referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Corporate Taxpayer.

(4) The decision referred to in paragraph (3) is issued no later than 1 (one) business day after the application is completely received.

Article 44

(1) In addition to in the event that the data and/or information contained in the tax administration differs from the actual circumstances as referred to in Article 43 paragraph (1), changes in the Corporate Taxpayer data are conducted in the event of changes in the Taxpayer's domicile address resulting in a transfer of working area of the Tax Office where the Taxpayer is registered.

(2) After examining the application for the transfer of the place where the Taxpayer is registered referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Corporate Taxpayer.

(3) The decision referred to in paragraph (2) is issued no later than 5 (five) business days after the application is completely received.

Article 45

(1) The Head of the Tax Office based on the application by a Corporate Taxpayer or *ex officio* may determine the Corporate Taxpayer as a Non-active Taxpayer.

(2) The determination of the Non-active Taxpayer referred to in paragraph (1) is conducted in the event that the Corporate Taxpayer:
   a. does not fulfil subjective and objective requirements but is still in process or has not been subject to Taxpayer Identification Number Deregistration; or
   b. fulfils certain criteria determined by the Director General of Taxes.

(3) The application for the determination of the Non-active Taxpayer referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating that the Corporate Taxpayer fulfils the criteria for Non-active Taxpayers.

(4) After examining the application for the determination of the Non-active Taxpayer referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Corporate Taxpayer.

(5) The decision referred to in paragraph (4) is issued no later than 5 (five) business days after the application is completely received.

(6) In the event that the Corporate Taxpayer no longer fulfils the criteria referred to in paragraph (2), the Head of the Tax Office based on the application by the Corporate Taxpayer or *ex officio* may re-activate the Non-active Taxpayer.

Article 46

(1) The Head of the Tax Office based on the application by a Corporate Taxpayer or *ex officio* may perform Taxpayer Identification Number Deregistration for Corporate Taxpayers that no longer fulfil the subjective and/or objective requirements pursuant to statutory provisions in the field of taxation.

(2) The Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted in the event that:
   a. the Corporate Taxpayer is liquidated or dissolved due to business termination or merger;
   b. the permanent establishment Taxpayer has terminated its business activities in Indonesia; or
   c. the Corporate Taxpayer has more than 1 (one) Taxpayer Identification Number.

Article 47

(1) The application for Taxpayer Identification Number Deregistration referred to in Article 46 paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with the required documents.

(2) The required documents as attachments to the application for Taxpayer Identification Number Deregistration referred to in paragraph (1) are in the form of:
   a. documents indicating that the Corporate Taxpayer has been liquidated or dissolved; or
   b. documents indicating that the permanent establishment Taxpayer has terminated its business activities in Indonesia.

(3) The Taxpayer Identification Number Deregistration for the application by the Corporate Taxpayer referred to in paragraph (1) is conducted based on Audit findings.

(4) Based on the Audit findings referred to in paragraph (3), the Head of the Tax Office issues the decision on the application no later than 12 (twelve) months from the date the application by the Corporate Taxpayer is completely received.

(5) If the period referred to in paragraph (4) has elapsed and the Head of the Tax Office does not issue a decision, the application by the Corporate Taxpayer is deemed granted and the Head of the Tax Office must issue the Taxpayer Identification Number Deregistration decision letter no later than 1 (one) month after the period referred to in paragraph (4) ends.

Article 48

(1) The *ex officio* Taxpayer Identification Number Deregistration referred to in Article 46 paragraph (1) is conducted by the Head of the Tax Office based on tax data and/or information held or obtained by the Directorate General of Taxes.

(2) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted based on Audit findings.

(3) In addition to being conducted based on Audit findings referred to in paragraph (2), the Head of the Tax Office may also perform Taxpayer Identification Number Deregistration *ex officio* based on the results of the administrative examination of the Corporate Taxpayer that fulfils certain criteria.

(4) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted through the issuance of the decision on Taxpayer Identification Number Deregistration.

Article 49

In addition to taking into account the fulfilment of subjective and/or objective requirements referred to in Article 46 paragraph (1), Taxpayer Identification Number Deregistration is conducted insofar as the Corporate Taxpayer fulfils the following provisions:

a. having no Tax Liability;
b. not currently subject to:
    1. an Audit to assess compliance with the fulfilment of tax obligations;
    2. a preliminary audit;
    3. a tax crime investigation; or
    4. a tax crime prosecution;
c. not currently in the process of completing the Mutual Agreement Procedure;
d. not currently in the process of completing an advance pricing agreement; and
e. not currently in the process of completing administrative remedies and legal remedies, in the form of:
    1. amendments as stipulated under Article 16 of the General Provisions and Tax Procedures Law;
    2. filing an objection;
    3. the reduction of Land and Building Tax;
    4. the reduction of or the nullification of administrative penalties;
    5. the reduction of Land and Building Tax administrative fines;
    6. the reduction or cancellation of an incorrect Notice of Tax Assessment;
    7. the reduction or cancellation of the Notice of Tax Due or Notice of Land and Building Tax Assessment;
    8. the reduction or cancellation of an incorrect Notice of Tax Collection;
    9. the cancellation of an incorrect Notice of Land and Building Tax Collection;
    10. the cancellation of tax audit findings or notice of tax assessment based on audit findings;
    11. a lawsuit;
    12. an appeal; and/or
    13. a civil review.

Article 50

(1) The Government Agency Taxpayers referred to in Article 15 paragraph (6) subparagraph d are required to register with the Tax Office whose working area covers the Taxpayers' domicile.
(2) The Government Agency Taxpayer registration referred to in paragraph (1) is conducted no later than before withholding and/or collecting taxes.
(3) The Government Agency Taxpayers referred to in paragraph (1) are required to report their organisational subunits to the Tax Office where the Government Agency Taxpayers are registered to obtain a Place of Business Identification Number for each of their organisational subunits.

Article 51

(1) The Government Agency Taxpayer registration referred to in Article 50 is conducted by submitting an application implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with the required documents.
(2) The registration referred to in paragraph (1) is conducted by:
    a. the head of the Central Government Agency, proxy of budget user, head of public service agency or official implementing the financial administration function of the Central Government Agency, for Central Government Agencies;
    b. the head of a Local Government Agency, budget user, head of the local public service agency or official implementing the financial administration function of the local government work unit, for Local Government Agencies; or
    c. the village head or village official implementing the management of village finances based on the decision of the village head, for Village Government Agencies.
(3) The documents required as attachments to the application for Taxpayer Identification Number registration referred to in paragraph (1) are in the form of:
    a. documents indicating that the Government Agency Taxpayer is a work unit acting as a user of the State Budget tasked and authorised to prepare the budget execution document as well as required to maintain accounting and prepare financial statements using government accounting standards pursuant to statutory provisions in the field of state finances, for Central Government Agencies;
    b. documents indicating that the Government Agency Taxpayer is a provincial and regency/municipal local government work unit acting as a user of the Local Government Budget tasked and authorised to prepare the budget execution document as well as required to maintain accounting and prepare financial statements using government accounting standards pursuant to statutory provisions in the field of state finances, for Local Government Agencies;
    c. documents indicating that the Government Agency Taxpayer is a work unit that applies public service agency financial management

patterns, for Central Government Agencies in the form of public service agencies;

d. documents indicating that the Government Agency Taxpayer is a work unit that applies local service agency financial management patterns, for Local Government Agencies in the form of local public services agencies; or
e. documents indicating that the Government Agency Taxpayer is an organisational unit administering village governance acting as a user of the Village Budget, for Village Government Agencies.

(4) Based on the application for Government Agency Taxpayer registration referred to in paragraph (1), the Head of the Tax Office issues a Taxpayer Identification Number no later than 1 (one) business day after the application is completely received.

Article 52

(1) In the event that the Government Agency Taxpayer does not implement the obligations referred to in Article 50, the Head of the Tax Office may issue a Taxpayer Identification Number *ex officio*.
(2) The *ex officio* issuance of Taxpayer Identification Number referred to in paragraph (1) is conducted based on the results of the administrative examination according to the data and/or information held or obtained by the Directorate General of Taxes, including data and/or information obtained from extensification activities.

Article 53

(1) The Head of the Tax Office based on the application by a Government Agency Taxpayer or *ex officio* may change Government Agency Taxpayer data in the event that the data and/or information contained in the tax administration differs from the actual circumstances.
(2) The application for the changes in the Government Agency Taxpayer data referred to in paragraph (1), is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating the changes in the Government Agency Taxpayer data.
(3) After examining the application for changes in the Government Agency Taxpayer data referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Government Agency Taxpayer.
(4) The decision referred to in paragraph (3) is issued no later than 1 (one) business day after the application is completely received.

Article 54

(1) In addition to in the event that the data and/or information contained in the tax administration differs from the actual circumstances as referred to in Article 53 paragraph (1), the changes in Government Agency Taxpayer data are conducted in the event of changes in the Government Agency Taxpayer's domicile address resulting in the transfer of the working area of the Tax Office where the Taxpayer is registered.

(2) After examining the application for the transfer of the place where the Government Agency Taxpayer is registered as referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Government Agency Taxpayer.
(3) The decision referred to in paragraph (2) is issued no later than 5 (five) business days after the application is completely received.

Article 55

(1) The Head of the Tax Office based on the application by a Government Agency Taxpayer or *ex officio* may determine the Government Agency Taxpayer as a Non-active Taxpayer.
(2) The determination of the Non-active Taxpayer referred to in paragraph (1) is conducted in the event that the Government Agency Taxpayer:
    a. does not fulfil the requirements as a withholding and/or collection agent but has not been subject to Taxpayer Identification Number Deregistration; or
    b. fulfils certain criteria determined by the Director General of Taxes.
(3) The application for the determination of the Non-active Taxpayer referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating that the Government Agency Taxpayer fulfils the criteria for Non-active Taxpayers.
(4) After examining the application for the determination of the Non-active Taxpayer referred to in paragraph (1), the Head of the Tax Office issues a decision and notifies the Government Agency Taxpayer.
(5) The decision referred to in paragraph (3) is issued no later than 5 (five) business days after the application is completely received.
(6) In the event that Government Agency Taxpayers no longer fulfil the criteria referred to in paragraph (2), the Head of the Tax Office based on the application by Government Agency Taxpayers or *ex officio* may re-activate Non-active Taxpayers.

Article 56

(1) The Head of the Tax Office based on the application by a Government Agency Taxpayer or *ex officio* may perform Taxpayer Identification Number Deregistration for the Government Agency Taxpayer that no longer fulfils the subjective and/or objective requirements pursuant to statutory provisions in the field of taxation.
(2) The Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted in the event that the Government Agency Taxpayer:
    a. does not fulfil the requirements as a withholding and/or collection agent pursuant to statutory provisions in the field of taxation; or
    b. has more than 1 (one) Taxpayer Identification Number.
(3) The application for Taxpayer Identification Number Deregistration by the Government Agency Taxpayer referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of

tax obligations referred to in Article 4 as well as attached with the documents stating that the Government Agency Taxpayer does not fulfil the requirements as a withholding and/or collection agent pursuant to statutory provisions in the field of taxation.

(4) The Taxpayer Identification Number Deregistration based on the application by the Taxpayer referred to in paragraph (1) is conducted based on Audit findings.

(5) Based on the Audit findings referred to in paragraph (4), the Head of the Tax Office issues the decision on the application no later than 6 (six) months from the date the application by the Government Agency Taxpayer is completely received.

(6) If the period referred to in paragraph (5) has elapsed and the Head of the Tax Office does not issue a decision, the application by the Government Agency Taxpayer is deemed granted and the Head of the Tax Office must issue the Taxpayer Identification Number Deregistration decision letter no later than 1 (one) month after the period referred to in paragraph (5) ends.

Article 57

(1) The *ex officio* Taxpayer Identification Number Deregistration referred to in Article 56 paragraph (1) is conducted by the Head of the Tax Office based on tax data and/or information held or obtained by the Directorate General of Taxes.

(2) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted based on Audit findings.

(3) In addition to being conducted based on Audit findings referred to in paragraph (1), the Director General of Taxes may also perform *ex officio* Taxpayer Identification Number Deregistration through an administrative examination of the Government Agency Taxpayer with certain criteria determined by the Director General of Taxes.

(4) The *ex officio* Taxpayer Identification Number Deregistration referred to in paragraph (1) is conducted through the issuance of the decision on Taxpayer Identification Number Deregistration.

Article 58

In addition to taking into account the fulfilment of subjective and/or objective requirements referred to in Article 56 paragraph (1), Taxpayer Identification Number Deregistration is conducted insofar as the Government Agency Taxpayer fulfils the following provisions:

a. having no Tax Liability;
b. not currently subject to:
    1. an Audit to assess compliance with the fulfilment of tax obligations;
    2. a preliminary audit;
    3. a tax crime investigation; or
    4. a tax crime prosecution; and
c. not currently in the process of completing administrative remedies and legal remedies, in the form of

1. amendments as stipulated under Article 16 of the General Provisions and Tax Procedures Law;
2. the filing of an objection;
3. the reduction of or the nullification of administrative penalties;
4. the reduction or cancellation of an incorrect Notice of Tax Assessment;
5. the reduction or cancellation of an incorrect Notice of Tax Collection;
6. the cancellation of tax audit findings or notice of tax assessment based on audit findings;
7. a lawsuit;
8. an appeal; and/or
9. a civil review.

Article 59

The Director General of Taxes may *ex officio*:

a. issue a Taxpayer Identification Number to a Taxpayer that does not implement the obligations referred to in Article 17 paragraph (1), Article 17 paragraph (2), Article 32 paragraph (4), Article 40 and Article 50 paragraph (2);
b. grant a tax identification number in the form of a Taxpayer Identification Number referred to in Article 16 paragraph (6) and Article 39 paragraph (4); and
c. conduct Taxpayer Identification Number Deregistration for Taxpayers that no longer fulfil the subjective and/or objective requirements pursuant to statutory provisions in the field of taxation,

to grant convenience in tax administration.

Section Two
Procedures for VAT Registration

Article 60

(1) Entrepreneurs conducting supplies and/or exports stipulated under the Value Added Tax Law, are required to report their business for VAT registration.
(2) The provisions on the obligation referred to in paragraph (1) shall not apply to small-scale entrepreneurs whose threshold is determined by the Minister.
(3) The small-scale Entrepreneurs referred to in paragraph (2) may choose to report their business for VAT registration, except for those required to perform VAT registration pursuant to statutory provisions in the field of taxation.
(4) Entrepreneurs initially intending to conduct supplies and/or exports as stipulated under the Value Added Tax Law may report their business for VAT registration.
(5) The business reporting obligation for VAT registration referred to in paragraph (1) is conducted within the period pursuant to the provisions stipulated under the Ministerial Regulation concerning the business reporting obligation for VAT registration.

(6) Entrepreneurs that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 61

(1) The Entrepreneurs referred to in Article 60 paragraph (1), paragraph (3) and paragraph (4) reports their business to the Tax Office where the Taxpayers are registered referred to in Article 15 paragraph (1).
(2) In the event that the Entrepreneurs referred to in Article 60 paragraph (1), paragraph (3) and paragraph (4) have:
    a. residence or domicile located in a free trade zone and free port; and
    b. a place of business outside the free trade zone and free port,

    the Entrepreneurs concerned must determine the place of business referred to in subparagraph b as the place for business reporting.
(3) In the event that an Entrepreneur has more than 1 (one) place of business as referred to in paragraph (2) subparagraph b, the Entrepreneur must determine one place of business as the place for business reporting.
(4) In the event that the domicile of the Corporate Entrepreneur uses a Virtual Office, the Virtual Office may be used as the place of VAT registration insofar as the Entrepreneur providing the Virtual Office services fulfils the following provisions:
    a. having been registered as a Taxable Person;
    b. providing a physical room for the place of business for the Entrepreneur that will be registered as a Taxable Person; and
    c. actually conducting office support service activities.
(5) In addition to having to fulfil the provisions referred to in paragraph (4), the Entrepreneur providing Virtual Office services must have:
    a. documents indicating the existence of a valid contract, agreement or similar documents between the Entrepreneur providing the Virtual Office services and the Entrepreneur; and
    b. documents indicating the granting of permits, business details or activity details from the competent authority or agency, namely the business identification number or other similar documents.
(6) In the event that the domicile of a Corporate Entrepreneur is located in a free trade zone and free port and chooses to use a place of business in the form of a Virtual Office outside the free trade zone and free port as the place for business reporting, the provisions referred to in paragraph (4) and paragraph (5) also apply to the Virtual Office.

Article 62

(1) The Entrepreneurs referred to in Article 60 paragraph (1), paragraph (3) and paragraph (4) reports their business for VAT registration by submitting an application for VAT registration.
(2) In the event that an Entrepreneur uses a Virtual Office as the place for business reporting, the Entrepreneur must provide a statement concerning the actual business activities and place of business.

(3) The application for VAT registration referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 63

(1) Based on the application for VAT registration referred to in Article 62 paragraph (1), the Head of the Tax Office where the Entrepreneur is registered:
   a. issues a certificate of VAT registration application; and
   b. examines the application by the Entrepreneur.

(2) The certificate of VAT registration application referred to in paragraph (1) subparagraph a is issued no later than 1 (one) business day after the application for VAT registration is completely received.

(3) The examination referred to in paragraph (1) subparagraph b includes:
   a. the examination of the completeness of data and/or documents related to the identity, incorporation and/or business activities;
   b. the examination of the conformity of business activities at the residence, domicile and/or place of business of the Entrepreneur with the completeness of data and/or documents referred to in subparagraph a; and
   c. the examination of the provisions on the use of Virtual Office as the place for business reporting and the statement by the Entrepreneur concerning business activities as well as the actual place of business, in the event that the Entrepreneur uses Virtual Office services.

(4) The examination of data and/or documents for the identity, incorporation and/or business activities referred to in paragraph (3) subparagraph a is conducted by examining data and/or documents available in the administration system of the Directorate General of Taxes, including:
   a. for individual Entrepreneurs, may be in the form of data and/or identity documents of the Entrepreneur for Indonesian Citizens and Foreign Nationals; and
   b. for Corporate Entrepreneurs may be in the form of:
      1. data and/or documents indicating the incorporation or establishment of the Entity and the amendments thereto; and
      2. data and/or documents indicating the identity of all management or persons in charge of the Entrepreneur.

(5) Based on the results of the examination referred to in paragraph (1) subparagraph b, the Head of the Tax Office where the Entrepreneur is administered grants a decision in the form of:
   a. accepting the application by the Entrepreneur for VAT registration in the event that the application fulfils the provisions on VAT registration; or
   b. rejecting the application by the Entrepreneur for VAT registration, in the event that the application does not fulfil the provisions on VAT registration.

(6) The decision referred to in paragraph (5) is granted no later than 10 (ten) business days after the application is completely received.

Article 64

(1) In the event that the application by an Entrepreneur for VAT registration is accepted as referred to in Article 63 paragraph (5) subparagraph a, the Head of the Tax Office grants access to prepare Tax Invoices.
(2) The access to prepare Tax Invoices referred to in paragraph (1) may be used by the Entrepreneur from the date of the start the obligations as a Taxable Person listed in the decision on VAT registration.

Article 65

(1) The Director General of Taxes is authorised to deactivate access to prepare Tax Invoices for:
    a. Taxable Persons indicated of misusing or using VAT registration without rights thereto; and/or
    b. Taxable Persons other than those referred to in subparagraph a that do not implement the obligations pursuant to statutory provisions in the field of taxation according to the criteria determined by the Director General of Taxes.
(2) For the deactivation of the access to prepare Tax Invoices referred to in paragraph (1), a Taxable Person may submit clarification to the Director General of Taxes.
(3) In the event that based on the clarification referred to in paragraph (2) or data and/or information held by the Directorate General of Taxes, it is known that the Taxable Person does not fulfil the criteria for the deactivation of the access to prepare Tax Invoices, the Director General of Taxes reactivates the access to prepare Tax Invoices.
(4) In the event that the Taxable Person does not submit the clarification pursuant to the provisions referred to in paragraph (2) within a period of 30 (thirty) days from the time of deactivation of the access to prepare Tax Invoices or the Taxable Person's clarification is rejected, the Head of the Tax Office performs *ex officio* VAT Deregistration.
(5) The Entrepreneur that has been subject to VAT Deregistration referred to in paragraph (4) may be re-registered as a Taxable Person insofar as having fulfilled the provisions referred to in paragraph (3).

Article 66

(1) The Head of the Tax Office may perform *ex officio* VAT Registration in the event that an Entrepreneur does not implement the business reporting obligation referred to in Article 60 paragraph (1).
(2) The *ex officio* VAT registration referred to in paragraph (1) is conducted based on Audit findings or the results of the administrative examination, according to data and/or information held or obtained by the Directorate General of Taxes, including data and/or information obtained from extensification activities.
(3) The Head of the Tax Office grants the decision on *ex officio* VAT registration and access to prepare Tax Invoices to the Entrepreneur subject to the *ex officio* VAT registration referred to in paragraph (1).

Article 67

VAT Deregistration may be conducted by the Head of the Tax Office based on the application for VAT Deregistration or *ex officio*.

Article 68

(1) A Taxable Person applies for VAT Deregistration referred to in Article 67 at the Tax Office of the place of VAT registration.
(2) The application for VAT Deregistration referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4 as well as attached with documents indicating that the Taxable Person no longer fulfils the provisions referred to in Article 60 paragraph (1).
(3) The VAT Deregistration based on the application by the Taxable Person referred to in paragraph (1) is conducted based on Audit findings.
(4) Based on the Audit findings referred to in paragraph (3), the Head of the Tax Office issues the decision on the application no later than 6 (six) months from the date the application by the Taxable Person is completely received.
(5) If the period referred to in paragraph (4) has elapsed and the Head of the Tax Office does not issue a decision, the application by the Taxable Person is deemed granted and the Head of the Tax Office issues the VAT Deregistration decision letter no later than 1 (one) month after the period referred to in paragraph (4) ends.

Article 69

(1) The *ex officio* VAT Deregistration referred to in Article 67, is conducted for Taxable Persons that no longer fulfil the provisions referred to in Article 60.
(2) The *ex officio* VAT Deregistration referred to in paragraph (1) is conducted based on Audit findings or the results of the administrative examination.
(3) The *ex officio* VAT Deregistration through the administrative examination referred to in paragraph (2) is conducted for Taxable Persons that fulfil the following criteria:
    a. Taxable Persons of Non-active Taxpayer status;
    b. the Taxable Persons have been subject to the deactivation of the access to prepare Tax Invoices and have not provided clarification within a period of 30 (thirty) days from the time of the deactivation or their clarification has been rejected;
    c. the Taxable Persons misuse or use VAT registration without rights thereto which has obtained a court decision with permanent legal force;
    d. the individual Taxable Persons have passed away and left no inheritance;
    e. permanent establishment Taxable Persons have terminated business activities in Indonesia; and/or
    f. Taxable Persons with certain circumstances determined by the Director General of Taxes.

(4) The VAT Deregistration referred to in paragraph (2) is conducted through the issuance of the decision on VAT Deregistration.
(5) Based on administrative convenience considerations, the Director General of Taxes may perform *ex officio* VAT Deregistration of Taxable Persons that no longer fulfil the requirements as Taxable Persons.

Article 70

(1) The tax obligations of a Taxpayer issued a Taxpayer Identification Number and/or registered as a Taxable Person based on the application by the Taxpayer or *ex officio* start from the time the Taxpayer fulfils subjective and objective requirements pursuant to statutory tax provisions, no later than 5 (five) years before the Taxpayer Identification Number is issued and/or registered as a Taxable Person.
(2) The Director General of Taxes may issue a Notice of Tax Assessment and/or Notice of Tax Collection for a Taxable Period, Fraction of a Tax Year or the Tax Year before the Taxpayer is granted or issued a Taxpayer Identification Number and/or registered as a Taxable Person, in the event that data and/or information is obtained indicating that there are tax obligations that have not been fulfilled by the Taxpayer.
(3) The Director General of Taxes may issue a Notice of Tax Assessment and/or Notice of Tax Collection for a Taxable Period, Fraction of a Tax Year or the Tax Year before and/or after Taxpayer Identification Number Deregistration or VAT Deregistration, in the event that after the Taxpayer Identification Number Deregistration or VAT Deregistration, data and/or information is obtained indicating that there are tax obligations that have not been fulfilled by the Taxpayer.
(4) For the issuance of the Notice of Tax Assessment and/or Notice of Tax Collection referred to in paragraph (2) and paragraph (3) related to tax obligations in the form of Value Added Tax, the Entrepreneur does not need to be registered as a Taxable Person.
(5) Excluded from the provisions referred to in paragraph (4), in the event that the calculation of Value Added Tax listed in the Notice of Tax Underpayment Assessment or the Notice of Additional Tax Underpayment Assessment applies the Input VAT crediting guidelines stipulated under Article 9 paragraph (9a) of the Value Added Tax Law, the Entrepreneur must first be registered as a Taxable Person.
(6) Taxpayer Identification Number Deregistration and/or VAT Deregistration shall be intended for tax administration purposes as well as shall not eliminate the tax rights and obligations that must be implemented by the Taxpayer and/or Taxable Person concerned.

Section Three
Procedures for the Registration, Filing and Data Collection of Land and Building Tax Objects

Article 71

(1) Every Taxpayer is required to register at the Tax Office where the Taxpayer is registered no later than 1 (one) month after the time the subjective requirements are fulfilled pursuant to statutory provisions in the field of Land and Building Tax to be granted a Certificate of Land and Building Tax Object Registration.

(2) The time the subjective requirements referred to in paragraph (1) are fulfilled includes:
   a. the date of the plantation business permit issued by the local government or the Online Single Submission Institution or the date of the right to cultivate issued by the ministry that administers governmental affairs in the field of land affairs, for Land and Building Tax Objects in the plantation sector;
   b. the date of assignment or the date of the business permit issued by the ministry that administers governmental affairs in the field of forestry or the Online Single Submission Institution, for Land and Building Tax Objects in the forestry sector;
   c. the effective date of the Cooperation Contract signed by the government and the Contractor of Cooperation Contract or the date the Cooperation Contract is signed in the event that there is no effective date for the contract, for Land and Building Tax Objects in the oil and gas mining sector;
   d. the date of the permit, power of attorney or assignment, issued by the ministry that administers governmental affairs in the field of energy and mineral resources or the Online Single Submission Institution or the date the contract is signed, for Land and Building Tax Objects in the mining sector for geothermal concession;
   e. the date of the permit issued by the ministry that administers governmental affairs in the field of energy and mineral resources, the local government or the Online Single Submission Institution or the date of the contract or agreement, for Land and Building Tax Objects in the mineral or coal mining sector; or
   f. the date of the fishery business permit issued by the ministry that administers governmental affairs in the field of maritime affairs and fisheries, or the Online Single Submission Institution or the date of the water permit issued by the ministry that administers governmental affairs in the field of transportation, for Land and Building Tax Objects in other sectors.

(3) The Certificate of Land and Building Tax Object Registration referred to in paragraph (1) contains the identity of the Taxable Object in the form of a Taxable Object Number.

Article 72

The registration referred to in Article 71 is conducted by submitting an application implemented to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 73

(1) The application for registration referred to in Article 72 is attached with the Taxable Object documents.
(2) The Taxable Object documents referred to in paragraph (1), include:
    a. plantation business permit documents issued by the local government or the Online Single Submission Institution and/or the right to cultivate issued by the ministry that administers governmental affairs in the field of land affairs, for Land and Building Tax Objects in the plantation sector;
    b. assignment or permit documents issued by the ministry that administers governmental affairs in the field of forestry or the Online Single Submission Institution, for Land and Building Tax Objects in the forestry sector;
    c. Cooperation Contract documents signed by the government and the Contractor of Cooperation Contract, for Land and Building Tax Objects in the oil and gas mining sector;
    d. permit, power of attorney or assignment documents issued by the ministry that administers governmental affairs in the field of energy and mineral resources or the Online Single Submission Institution or contract documents, for Land and Building Tax Objects in the mining sector for geothermal concession;
    e. permit documents issued by the ministry that administers governmental affairs in the field of energy and mineral resources or the local government or the Online Single Submission Institution, contract documents or the agreement, for Land and Building Tax Objects in the mineral or coal mining sector; or
    f. permit documents issued by the ministry that administers governmental affairs in the field of maritime affairs and fisheries or the Online Single Submission Institution or in the field of transportation, for Land and Building Tax Objects in other sectors.

Article 74

(1) Based on the application for the registration referred to in Article 72, the Head of the Tax Office conducts an administrative examination.
(2) Based on the administrative examination referred to in paragraph (1), the Head of the Tax Office issues a decision in the form of:
    a. accepting the application by issuing a Certificate of Land and Building Tax Object Registration; or
    b. rejecting the application by issuing a rejection letter for the application for Taxable Object registration,

    no later than 10 (ten) business days from the time the application is completely received.

(3) In the event that the Head of the Tax Office does not issue a decision within the period referred to in paragraph (2), the application is deemed granted and the Head of the Tax Office issues a Certificate of Land and Building Tax Object Registration no later than 1 (one) business day after the period for the granting of the decision ends.

Article 75

(1) In the event that a Taxpayer does not implement the registration obligation referred to in Article 71 paragraph (1), the Head of the Tax Office conducts an Audit or administrative examination.
(2) Based on the Audit findings or the results of the administrative examination referred to in paragraph (1), the Head of the Tax Office issues a Certificate of Land and Building Tax Object Registration based on authority *ex officio*.
(3) The Certificate of Land and Building Tax Object Registration referred to in paragraph (2) is delivered to the Taxpayer no later than 3 (three) business days from the date of issuance of the Certificate of Land and Building Tax Object Registration.

Article 76

(1) The Head of the Tax Office based on the application by a Taxpayer or based on authority may *ex officio* change the Land and Building Tax object data listed in the Certificate of Land and Building Tax Object Registration.
(2) The application for the changes in the data referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 77

(1) The Head of the Tax Office based on the application by a Taxpayer or based on authority may *ex officio* revoke the Certificate of Land and Building Tax Object Registration for Taxable Objects that no longer fulfil the subjective requirements pursuant to statutory provisions in the field of Land and Building Tax.
(2) The application for the revocation of the Certificate of Land and Building Tax Object Registration referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.
(3) The application for the revocation of the Certificate of Land and Building Tax Object Registration referred to in paragraph (2) is attached with the documents referred to in Article 73 paragraph (2), that have expired, and their validity period is not extended.
(4) The *ex officio* revocation of the Certificate of Land and Building Tax Object Registration based on authority referred to in paragraph (1) is conducted by the Head of the Tax Office based on tax data and/or information held or obtained by the Directorate General of Taxes.
(5) The revocation of the Certificate of Land and Building Tax Object Registration based on the application by the Taxpayer or based on

authority *ex officio* referred to in paragraph (1) is conducted based on Audit findings or the results of the administrative examination.

(6) Based on Audit findings or the results of the administrative examination referred to in paragraph (5), the Head of the Tax Office issues a decision in the form of:
   a. accepting the application by the Taxpayer with the issuance of a revocation of the Certificate of Land and Building Tax Object Registration decision letter; or
   b. rejecting the application by the Taxpayer by issuing a rejection letter for the revocation of the Certificate of Land and Building Tax Object Registration.

(7) The decision referred to in paragraph (6) is issued no later than 6 (six) months from the date the application by the Taxpayer is completely received.

(8) In the event that the period referred to in paragraph (7) has elapsed and the Head of the Tax Office does not issue a decision, the application by the Taxpayer is deemed granted.

(9) The Head of the Tax Office must issue the revocation of the Certificate of Land and Building Tax Object Registration decision letter no later than 1 (one) month after the period referred to in paragraph (8) ends.

Article 78

(1) The Director General of Taxes may issue a Notice of Tax Due and/or Notice of Land and Building Tax Assessment for the Tax Year before the Taxpayer is granted or issued the Certificate of Land and Building Tax Object Registration, if data and/or information is obtained indicating the existence of Land and Building Tax obligations that have not been fulfilled by the Taxpayer.

(2) The Director General of Taxes may issue a Notice of Tax Due, Notice of Land and Building Tax Assessment and/or Notice of Land and Building Tax Collection before and/or after the revocation of the Certificate of Land and Building Tax Object Registration, if after the revocation of the Certificate of Land and Building Tax Object Registration, data and/or information is obtained indicating the existence of Land and Building Tax obligations that have not been fulfilled by the Taxpayer.

(3) The Notice of Tax Due and/or Notice of Land and Building Tax Assessment referred to in paragraph (1) and paragraph (2) is issued no later than 5 (five) years after the end of the Tax Year.

Article 79

(1) A Taxpayer is required to report the Taxable Objects that have been registered using the Notice of Taxable Objects submitted by the Directorate General of Taxes.

(2) The reporting referred to in paragraph (1) is conducted for each Tax Year.

(3) The date of submission of the Notice of Taxable Objects by the Directorate General of Taxes referred to in paragraph (1) is the date of receipt of the Notice of Taxable Objects by the Taxpayer, including:

a. 1 February of the Tax Year Land and Building Tax becomes payable, for Land and Building Tax Objects in the plantation sector, Land and Building Tax Objects in the oil and gas mining sector and Land and Building Tax Objects in the mining sector for geothermal concession;
b. 31 March of the Tax Year Land and Building Tax becomes payable, for Land and Building Tax Objects in the forestry sector, Land and Building Tax Objects in the mineral or coal mining sector and Land and Building Tax Objects in other sectors; or
c. the date the Taxable Objects are registered as listed in the Certificate of Land and Building Tax Object Registration, in the event that for the Taxable Object Registration, the Certificate of Land and Building Tax Object Registration is issued after 1 February of the Tax Year Land and Building Tax becomes payable referred to in subparagraph a or 31 March of Tax Year Land and Building Tax becomes payable as referred to in subparagraph b and the circumstances at the time Land and Building Tax becomes payable are fulfilled according to the circumstances of the Taxable Objects on 1 January of the Tax Year Land and Building Tax becomes payable.

Article 80

(1) The Notice of Taxable Objects referred to in Article 79 paragraph (1) is an Electronic Notice of Taxable Objects.
(2) The Directorate General of Taxes submits the Electronic Notice of Taxable Objects referred to in paragraph (1) to the Taxpayer through the Taxpayer Account.
(3) The Directorate General of Taxes notifies the submission of the Electronic Notice of Taxable Objects to the Taxpayer.
(4) The Taxpayer is required to submit the Electronic Notice of Taxable Objects referred to in paragraph (1) to the Directorate General of Taxes through:
    a. the Taxpayer Portal; or
    b. other webpages or applications integrated with the administration system of the Directorate General of Taxes.
(5) The submission date of the Electronic Notice of Taxable Objects referred to in paragraph (4) is the date listed in the electronic receipt.

Article 81

(1) The Notice of Taxable Objects referred to in Article 79 paragraph (1) must be filled in clearly, correctly and completely as well as signed by the Taxpayer and submitted to the Directorate General of Taxes no later than 30 (thirty) days after the date the Notice of Taxable Objects is received.
(2) Clearly referred to in paragraph (1) implies that the completion of the data in the Notice of Taxable Objects does not give rise to misinterpretations that may cause losses to the state or the Taxpayers themselves.
(3) Correctly referred to in paragraph (1) implies that all filed data must conform with the actual circumstances.

(4) Completely referred to in paragraph (1) implies that the Notice of Taxable Objects contains all elements that must be filed and attached with supporting documents for the entries in the Notice of Taxable Objects.

Article 82

(1) In the event that the period of 30 (thirty) days referred to in Article 81 paragraph (1) cannot be fulfilled, the Taxpayer may submit a notice of the postponement of the submission of the Notice of Taxable Objects.
(2) The notice of the postponement of the submission of the Notice of Taxable Objects referred to in paragraph (1) must be received before the period of 30 (thirty) days referred to in Article 81 paragraph (1) ends.
(3) The postponement of the submission of the Notice of Taxable Objects is conducted for a maximum of 7 (seven) days after the period of 30 (thirty) days referred to in Article 81 paragraph (1) ends.

Article 83

(1) In the event that the Notice of Taxable Objects has not been submitted to the Directorate General of Taxes after the period of 30 (thirty) days referred to in Article 81 paragraph (1) and the Taxpayer does not submit the notice of the postponement of the submission of the Notice of Taxable Objects referred to in Article 82 paragraph (1), the Head of the Tax Office issues a reprimand letter and submits it to the Taxpayer through the Taxpayer Account.
(2) In the event that the Notice of Taxable Objects has not been submitted to the Directorate General of Taxes after the period of 7 (seven) days referred to in Article 82 paragraph (3), the Head of the Tax Office issues a reprimand letter and submits it to the Taxpayer through the Taxpayer Account.
(3) The Taxpayer is required to submit the Notice of Taxable Objects within a maximum period of 7 (seven) days after the date the reprimand letter referred to in paragraph (1) and paragraph (2) is received.
(4) The date of the receipt of the reprimand letter referred to in paragraph (3) is the date the reprimand letter is delivered to the Taxpayer Account.
(5) In the event that the Taxpayer does not submit the Notice of Taxable Objects within the period referred to in paragraph (3), the Tax Office conducts a risk analysis for the Audit proposal.

Article 84

(1) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in the plantation sector, include:
    a. plantation business permit documents issued by the local government or the Online Single Submission Institution and/or the right to cultivate issued by the ministry that administers governmental affairs in the field of land affairs; and

b. the plantation business progress report and map of the last planting year before the Tax Year Land and Building Tax becomes payable in a certain format.

(2) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in the forestry sector, include:
   a. permit or assignment documents issued by the ministry that administers governmental affairs in the field of forestry or the Online Single Submission Institution;
   b. the business work plans for the Tax Year Land and Building Tax becomes payable; and
   c. the annual work plans as well as the work map for the Tax Year Land and Building Tax becomes payable or the last year before the Tax Year Land and Building Tax becomes payable in a certain format.

(3) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in the oil and gas mining sector, include:
   a. Cooperation Contract documents signed by the government and Contractor of Cooperation Contract;
   b. the map of oil and gas working areas in a certain format;
   c. the authorisation for expenditure and financial quarterly report for the fourth quarter of the last year before the Tax Year Land and Building Tax becomes payable; and
   d. contract or gas sale and purchase agreement documents for gas mining for the last year before the Tax Year Land and Building Tax becomes payable.

(4) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in the mining sector for geothermal concession, include:
   a. permit, power of attorney or assignment documents issued by the ministry that administers governmental affairs in the field of energy and mineral resources or the Online Single Submission Institution or contract documents;
   b. the map of geothermal working areas in a certain format; and
   c. the work plans and budget for the Tax Year Land and Building Tax becomes payable.

(5) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in the mineral or coal mining sector, include:
   a. permit documents issued by the ministry that administers governmental affairs in the field of energy and mineral resources or the local government or the Online Single Submission Institution, contract or agreement documents; and
   b. the work plans and budget for the last year before the Tax Year Land and Building Tax becomes payable.

(6) The supporting documents for the entries in the Notice of Taxable Objects referred to in Article 81 paragraph (4) for Land and Building Tax in other sectors, include:
   a. permit documents issued by the ministry that administers governmental affairs in the field of maritime affairs and fisheries or the Online Single Submission Institution or the field of transportation; and
   b. other documents constituting the basis for the completion of the Notice of Taxable Objects.

(7) The supporting documents for the entries in the Notice of Taxable Objects referred to in paragraph (1) subparagraph a, paragraph (2) subparagraph a, paragraph (3) subparagraph a and subparagraph b, paragraph (4) subparagraph a and subparagraph b, paragraph (5) subparagraph a and paragraph (6) subparagraph a, do not need to be attached to the Notice of Taxable Objects if they have been attached at the time of registration or have been filed at the time of the filing of the Taxable Object data in the previous Tax Year.

(8) The supporting documents for the entries in the Notice of Taxable Objects referred to in paragraph (1) subparagraph a, paragraph (2) subparagraph a, paragraph (3) subparagraph a and subparagraph b, paragraph (4) subparagraph a and subparagraph b, paragraph (5) subparagraph a and paragraph (6) subparagraph a, do not need to be attached to the Notice of Taxable Objects if there are no changes.

(9) In the event that there are documents referred to in paragraph (1), paragraph (2), paragraph (3), paragraph (4), paragraph (5) and paragraph (6) which cannot yet be attached, the Notice of Taxable Objects is deemed complete insofar that the Taxpayer attaches a written statement that:
   a. is signed by the Taxpayer;
   b. lists the types of documents that cannot yet be attached;
   c. explains the reasons why the documents concerned cannot yet be attached; and
   d. declares that the documents will be submitted no later than 30 (thirty) days from:
      1. the end of the period of 30 (thirty) days referred to in Article 81 paragraph (1);
      2. the time the Notice of Taxable Objects is submitted by the Taxpayer through the postponement of the submission of the Notice of Taxable Objects; or
      3. the Notice of Taxable Objects is submitted by the Taxpayer after a reprimand letter for the submission of the Notice of Taxable Objects is issued.

Article 85

(1) The Directorate General of Taxes conducts a formal examination of the Notice of Taxable Objects submitted by the Taxpayer, of:
   a. the completeness of the completion of the Notice of Taxable Objects;

b. the Notice of Taxable Objects signed by the Taxpayer or the Taxpayer's attorney;
c. the Notice of Taxable Objects complemented by supporting documents for the entries in the Notice of Taxable Objects referred to in Article 84; and
d. the Notice of Taxable Objects submitted by the Taxpayer within the period referred to in Article 81 paragraph (1), Article 82 paragraph (3) or Article 83 paragraph (3).

(2) In the event that the results of the formal examination referred to in paragraph (1) are fulfilled, the Directorate General of Taxes issues an electronic receipt.

(3) In the event that the results of the formal examination referred to in paragraph (1) are not fulfilled, the Notice of Taxable Objects is deemed not submitted.

Article 86

(1) The Directorate General of Taxes through the Tax Office where the Taxable Objects are registered conducts a material examination of the Notice of Taxable Objects which has been submitted by the Taxpayer and the formal examination has been conducted as referred to in Article 85 paragraph (1).

(2) In the event that based on the results of the material examination referred to in paragraph (1), there are indications that the tax obligations in the completion of the Notice of Taxable Objects do not comply with statutory provisions in the field of taxation, the Directorate General of Taxes through the Tax Office where the Taxable Objects are registered may request clarification from the Taxpayer.

(3) The clarification referred to in paragraph (2) is conducted by issuing and submitting a request letter for clarification.

(4) The clarification referred to in paragraph (2) may be continued by reviewing the Taxable Objects.

(5) Based on the request letter for clarification referred to in paragraph (3), the Taxpayer responds by:
a. preparing a response letter for the request letter for clarification; and/or
b. amending the Notice of Taxable Objects.

(6) The Directorate General of Taxes through the Tax Office where the Taxable Objects are registered prepares a report on the implementation of the clarification based on the results of the clarification referred to in paragraph (2).

(7) The report on the implementation of the clarification referred to in paragraph (6) may be used as risk analysis materials for the Audit proposal in the event that:
a. the Taxpayer does not prepare a response letter for the request letter for clarification as referred to in paragraph (5) subparagraph a;
b. the Taxpayer does not amend the Notice of Taxable Objects as referred to in paragraph (5) subparagraph b; or

c. the Taxpayer amends the Notice of Taxable Objects referred to in paragraph (5) subparagraph b but does not conform with the request letter for clarification referred to in paragraph (3).

Article 87

(1) A Taxpayer may amend the Notice of Taxable Objects that has been submitted to the Directorate General of Taxes by submitting the amended Notice of Taxable Objects.
(2) The amended Notice of Taxable Objects referred to in paragraph (1) is submitted no later than 15 (fifteen) days after the end of the period of 30 (thirty) days referred to in Article 81 paragraph (1).
(3) In the event that the request letter for clarification referred to in Article 86 paragraph (3) is submitted to the Taxpayer after the period referred to in paragraph (2) ends, the amended Notice of Taxable Objects referred to in Article 86 paragraph (5) subparagraph b is submitted no later than 7 (seven) days from the date the request letter for clarification is received.
(4) The date the request letter for clarification referred to in paragraph (3) is received is the date the request letter for clarification is delivered to the Taxpayer Account.

Article 88

(1) The Taxpayer that amends the Notice of Taxable Objects must submit the amended Notice of Taxable Objects within the period referred to in Article 87 paragraph (2) or paragraph (3).
(2) In the event that the amended Notice of Taxable Objects is submitted by the Taxpayer past the period referred to in paragraph (1), the amended Notice of Taxable Objects is deemed not submitted.

Article 89

(1) The Director General of Taxes is authorised to perform Data Collection on Taxable Objects that have been registered.
(2) The types of Data Collection referred to in paragraph (1) include:
    a. office Data Collection; and/or
    b. field Data Collection.
(3) The Data Collection referred to in paragraph (1) is conducted by Data Collection officers.
(4) The results of the Data Collection referred to in paragraph (1) are reported in the form of the Data Collection result report.

Article 90

(1) The office Data Collection referred to in Article 89 paragraph (2) subparagraph a is conducted by processing Taxable Object data filed by the Taxpayer through the Notice of Taxable Objects referred to in Article 79 paragraph (1) and/or processing data and information contained in the administration system of the Directorate General of Taxes.
(2) The scope of the office Data Collection referred to in paragraph (1) includes:
    a. data collection; and

b. mapping.

(3) The data collection referred to in paragraph (2) subparagraph a is an activity that includes:
   a. the collection of Taxable Object data filed in the Notice of Taxable Objects referred to in Article 79 paragraph (1); and
   b. the processing of Taxable Object data sourced from Government Agencies, institutions, associations and other parties stipulated under statutory laws and regulations concerning the provision and collection of data and information related to taxation.

(4) The mapping referred to in paragraph (2) subparagraph b is conducted through the conversion of the Taxable Object map, which includes:
   a. the transformation between projection systems; and/or
   b. digitising analogue maps to digital maps.

Article 91

(1) The field Data Collection referred to in Article 90 paragraph (2) subparagraph b is conducted by reviewing the physical location of the Taxable Objects and/or other locations outside the physical location of the Taxable Objects, of Taxable Object data that should be filed in the Notice of Taxable Objects referred to in Article 79 paragraph (1).

(2) The scope of the field Data Collection referred to in paragraph (1) includes:
   a. data collection; and
   b. mapping.

(3) The data collection referred to in paragraph (2) subparagraph a is the activity of collecting data on Taxable Objects that are not or have not been filed in the Notice of Taxable Objects referred to in Article 79 paragraph (1).

(4) The mapping referred to in paragraph (2) subparagraph b is conducted through measuring Taxable Objects, which includes:
   a. measurement using satellite-based measurement systems;
   b. measurement using the aid of remote sensing data; and/or
   c. measurement using manual measuring instruments.

Article 92

(1) In the event that a Taxpayer declares the refusal to be subject to the field Data Collection referred to in Article 91 paragraph (1), the Taxpayer must sign a statement letter of refusal of Data Collection.

(2) In the event that the Taxpayer refuses to sign the statement letter of refusal of Data Collection referred to in paragraph (1), the Data Collection officers prepare the official report on the refusal of Data Collection signed by the Data Collection officers.

(3) In the event that the Taxpayer declares the refusal to be subject to field Data Collection referred to in paragraph (1) or refuses to sign the statement letter of refusal of Data Collection referred to in paragraph (2), Data Collection officers continue to conduct Data Collection based on data and/or information held and/or obtained by the Directorate General of Taxes.

(4) The Data Collection referred to in paragraph (3) is reported in the form of a Data Collection results report.

Article 93

The Data Collection results report referred to in Article 89 paragraph (4) and Article 92 paragraph (4) is a document that may be used as:

a. the examination materials referred to in Article 86 paragraph (1); or
b. risk analysis materials for an Audit proposal.

CHAPTER V
PROCEDURES FOR THE TAX PAYMENT AND REMITTANCE, REFUND OF TAX OVERPAYMENTS THAT SHOULD NOT OTHERWISE BE PAYABLE, INTEREST COMPENSATION AS WELL AS TAX REFUNDS

Section One
Procedures for the Tax Payment and Remittance

Article 94

(1) Tax payable must be paid and remitted before the due date.
(2) The payment and remittance referred to in paragraph (1) must be conducted no later than the 15th (fifteenth) of the following month after the Taxable Period ends, including:
    a. Article 4 paragraph (2) Income Tax;
    b. Article 15 Income Tax;
    c. Article 21 Income Tax;
    d. Article 22 Income Tax;
    e. Article 23 Income Tax;
    f. Article 25 Income Tax;
    g. Article 26 Income Tax;
    h. oil and/or gas Income Tax on upstream oil and/or gas business activities paid in each Taxable Period;
    i Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory;
    j. Value Added Tax payable on self-building activities;
    k. Stamp Duty collected by Stamp Duty collecting agents;
    l. Sales Tax; and
    m. Carbon Tax collected by Carbon Tax collection agents.
(3) Excluded from the provisions referred to in paragraph (2) are the tax payment and remittance for:
    a. Article 22 Income Tax and Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on imports that:
        1. are self-remitted by the Taxpayer/importer must be settled at the same time as the payment of import duty, in the event that import duty is deferred or exempt from Article 22 Income Tax and Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on the import must be settled at the time the import declaration documents are completed; and

2. are collected by the Directorate General of Customs and Excise must be remitted within a period of 1 (one) business day after the tax collection is conducted;

b. Article 25 Income Tax for Taxpayers with certain criteria stipulated under Article 3 paragraph (3b) of the General Provisions and Tax Procedures Law that file several Taxable Periods in one Periodic Tax Return must be paid no later than the 15th (fifteenth) of the following month after the end of the last Taxable Period;

c. Periodic payments other than Article 25 Income Tax for Taxpayers with certain criteria referred to in subparagraph b must be paid no later than according to the deadline for each type of tax;

d. Additional Income Tax on founders stock collected by the issuer must be remitted no later than 1 (one) month after the time the additional Income Tax becomes payable;

e. Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable in one Taxable Period must be remitted no later than the end of the following month after the Taxable Period ends and before the Periodic Value Added Tax Return is filed; and

f. Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods collected by Value Added Tax Collection Agents and Other Parties must be remitted no later than the end of the following month after the Taxable Period ends and before the Periodic Value Added Tax Return is filed.

(4) Taxpayers that do not fulfil the provisions referred to in paragraph (1), paragraph (2) and paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 95

(1) The tax payable underpayment based on the Annual Tax Return for Income Tax and Carbon Tax must be paid in full before the Annual Tax Return is filed but not past the filing deadline for the Annual Tax Return.

(2) Taxpayers that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 96

(1) Stamp Duty must be paid in full at the time Stamp Duty becomes payable.

(2) Taxpayers that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under statutory provisions in the field of taxation.

Article 97

(1) The outstanding tax based on the Notice of Tax Due must be paid no later than 6 (six) months from the date the Notice of Tax Due is received by the Taxpayer.

(2) The outstanding tax based on the Notice of Land and Building Tax Assessment must be settled no later than 1 (one) month from the date the Notice of Land and Building Tax Assessment is received by the Taxpayer.
(3) The outstanding tax based on the Notice of Land and Building Tax Collection must be paid no later than 1 (one) month from the date of the Notice of Land and Building Tax Collection is received by the Taxpayer.
(4) Taxpayers that do not fulfil the provisions referred to in paragraph (1), paragraph (2) and paragraph (3) are subject to penalties as stipulated under the Land and Building Tax Law.

Article 98

(1) The Notice of Tax Collection, Notice of Tax Underpayment Assessment as well as Notice of Additional Tax Underpayment Assessment and Objection Decision Letter, Amendment Decision Letter, Mutual Agreement Decision Letter, Appeal Decision as well as Civil Review Decision, which cause the amount of outstanding tax to increase, must be settled within a period of 1 (one) month from the date of issuance.
(2) In the event that the Taxpayer does not file an objection, the amount of tax in the Notice of Tax Assessment referred to in paragraph (1) which is not approved by the Taxpayer in the Closing Conference, either in part or in full, must be settled no later than 1 (one) month from the date of issuance of the Notice of Tax Underpayment Assessment or Notice of Additional Tax Underpayment Assessment.
(3) In the event that the Taxpayer files an objection and does not file an appeal, the amount of tax in the Notice of Tax Assessment referred to in paragraph (1) which is not approved by the Taxpayer in the Closing Conference and has not been paid until the Objection Decision Letter is issued must be settled no later than 1 (one) month from the date of issuance of the Objection Decision Letter by taking into account the amount of tax based on the Objection Decision Letter.
(4) In the event that the Taxpayer files an appeal, the amount of tax in the Notice of Tax Assessment referred to in paragraph (1) which is not approved by the Taxpayer in the Closing Conference and has not been paid until the date the Appeal Decision is settled must be settled no later than 1 (one) month from the date of issuance of the Appeal Decision by taking into account the amount of tax based on the Appeal Decision.
(5) In the event that the Taxpayer agrees to the entire amount of outstanding tax in the Closing Conference, the settlement of the amount of outstanding tax must be conducted no later than 1 (one) month from the date of issuance of the Notice of Tax Assessment stipulated under Article 9 paragraph (3) of the General Provisions and Tax Procedures Law.
(6) The settlement period referred to in paragraph (2), paragraph (3) and paragraph (4) also applies to the administrative penalties stipulated under Article 14 paragraph (4) of the General Provisions and Tax Procedures Law in the Notice of Tax Collection related to the amount of tax in the Notice of Tax Assessment which is not approved in the Closing Conference.

(7) The date the Appeal Decision and Civil Review Decision are issued referred to in paragraph (1) is the date the Appeal Decision and Civil Review Decision are received by the office of the Directorate General of Taxes authorised to implement the decision.
(8) Taxpayers that do not fulfil the provisions referred to in paragraph (1) to paragraph (6) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 99

(1) For small-scale business taxpayers and Taxpayers in certain regions, the settlement period referred to in Article 98 paragraph (1) may be extended to a maximum of 2 (two) months from the date of issuance.
(2) The small-scale business taxpayers referred to in paragraph (1) consist of individual Taxpayers and Corporate Taxpayers.
(3) The small-scale business individual Taxpayers referred to in paragraph (2) must fulfil the following criteria:
    a. receiving business income, excluding income from services in connection with independent personal services; and
    b. having gross turnover not exceeding IDR4,800,000,000.00 (four billion and eight hundred million rupiah) in 1 (one) Tax Year.
(4) The small-scale business Corporate Taxpayers referred to in paragraph (2) must fulfil the following criteria:
    a. Corporate Taxpayers, excluding permanent establishments; and
    b. receiving business income, excluding income from services in connection with independent personal services, with gross turnover not exceeding IDR4,800,000,000.00 (four billion and eight hundred million rupiah) in 1 (one) Tax Year.
(5) To obtain an extension of the settlement period referred to in paragraph (1), small-scale business Taxpayers or Taxpayers in certain regions must apply for an extension of the settlement period to the Director General of Taxes, no later than 9 (nine) business days before the payment due date using an application letter for an extension of the settlement period.
(6) For the application by the Taxpayer referred to in paragraph (5), the Director General of Taxes issues a decision in a period of 7 (seven) business days after the date the application is received.
(7) The decision referred to in paragraph (6) is in the form of:
    a. approving; or
    b. rejecting the application by the Taxpayer.
(8) In the event that the application by the Taxpayer is approved as referred to in paragraph (7) subparagraph a, the Director General of Taxes issues a decision on approval of the extension of the tax settlement period.
(9) In the event that the application by the Taxpayer is rejected as referred to in paragraph (7) subparagraph b, the Director General of Taxes issues a decision on the rejection of the extension of the tax settlement period.
(10) If the period of 7 (seven) business days referred to in paragraph (6) has elapsed and the Director General of Taxes does not issue a decision, the application by the Taxpayer is deemed accepted.

(11) The decision on approval referred to in paragraph (10) must be issued no later than 5 (five) business days after the period of 7 (seven) business days ends.

Article 100

(1) In the event that the due date for the tax payment or remittance referred to in Article 94 falls on a holiday, the tax payment or remittance may be conducted no later than the following business day.
(2) The holidays referred to in paragraph (1) are Saturdays, Sundays, national holidays, days off for the organisation of general elections or days determined as national collective leave.

Article 101

The tax payment and remittance are conducted to the State Treasury through payment services or channels provided by Collecting Agents pursuant to statutory provisions on the electronic state revenue system.

Article 102

(1) The tax payment and remittance are conducted using:
    a. the Tax Payment Slip;
    b. Stamps, for the payment of Stamp Duty; or
    c. other administrative means equivalent to the Tax Payment Slip.
(2) The tax payment and remittance referred to in paragraph (1) include payment and remittance of Income Tax, Value Added Tax, Sales Tax on Luxury Goods, Stamp Duty, Land and Building Tax, Sales Tax and Carbon Tax.
(3) The tax payment referred to in paragraph (2) is conducted using the Taxpayer Identification Number of the party required to pay or remit taxes that have been collected or withheld pursuant to statutory provisions in the field of taxation.
(4) The other administrative means referred to in paragraph (1) subparagraph c may be in the form of:
    a. the State Revenue Receipt for the tax payment and remittance through the electronic state revenue system;
    b. the Customs, Excise and Tax Payment Slip for the payment and remittance of import Article 22 Income Tax, import Value Added Tax and import Sales Tax on Luxury Goods as well as Value Added Tax on domestically manufactured tobacco products;
    c. the Overbooking Receipt for tax payment and remittance through Overbooking;
    d. the Fund Disbursement Order for the tax payment; and
    e. other tax revenue receipts pursuant to statutory provisions.
(5) The Tax Payment Slip and other administrative means in the form of the State Revenue Receipt and Customs, Excise and Tax Payment Slip referred to in paragraph (4) subparagraph a and subparagraph b are declared valid, in the event that they have been validated using a State Revenue Transaction Number.

(6) The Tax Payment Slip referred to in paragraph (5) is recognised as a valid payment receipt in the event that it has been validated by appointed officials of the ministry that administers governmental affairs in the field of oil and gas business activities, the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency.
(7) The Overbooking Receipt referred to in paragraph (4) subparagraph c is declared valid in the event that it has been signed by the official authorised to issue the Overbooking Receipt.
(8) The Fund Disbursement Order referred to in paragraph (4) subparagraph d is declared valid in the event that it has been validated by the state treasury and budget system.
(9) Other tax revenue receipts referred to in paragraph (4) subparagraph e are declared valid in the event that they have been validated by the system or the official authorised to validate revenue receipts pursuant to statutory provisions.
(10) The date of tax payment and remittance is recognised according to:
a. the date of payment stated in the State Revenue Receipt;
b. the date of the affixture of the Stamp pursuant to statutory provisions stipulating procedures for payment of stamp duty;
c. the date of payment stated in the Overbooking Receipt;
d. the date the Fund Disbursement Order is issued, for payments in the context of the implementation of the State Budget;
e. the date the Tax Refund Decision Letter is issued, for the settlement of Tax Liabilities through the calculation of tax overpayment; or
f. the date of payment based on validation of other administrative means.

Article 103

(1) Taxpayers may pay and remit taxes using Tax Deposit.
(2) The tax payment and remittance using the Tax Deposit referred to in paragraph (1) are conducted through Overbooking.
(3) Tax Deposit top-up is conducted using:
a. the payment through the electronic state revenue system;
b. the application for Overbooking; or
c. the application for the remaining tax overpayment or remaining interest compensation after being set off against Tax Liabilities.
(4) The date of the Tax Deposit top-up conducted using:
a. the payment through the electronic state revenue system referred to in paragraph (3) subparagraph a is recognised as the date of tax payment and remittance according to the date of payment stated in the State Revenue Receipt;
b. the application for Overbooking referred to in paragraph (3) subparagraph b is recognised as the date of tax payment and remittance according to the date of payment stated in the Overbooking Receipt; and
c. the application for the remaining tax overpayment or remaining interest compensation referred to in paragraph (3) subparagraph c is

recognised as the date of tax payment and remittance according to the date of issuance of the Tax Refund Decision Letter.

Article 104

(1) 1 (one) Tax Payment Slip may be used for the payment and remittance of 1 (one) or several:
   a. types of taxes;
   b. Taxable Periods, Fractions of a Tax Year or Tax Years; or
   c. Notices of Tax Collection, Notices of Tax Underpayment Assessment, Notices of Additional Tax Underpayment Assessment, Notices of Land and Building Tax Assessment, Notices of Land and Building Tax Collection, Notices of Tax Due and Amendment Decision Letters, Objection Decision Letters, Mutual Agreement Decision Letters, Appeal Decisions as well as Civil Review Decisions which cause the amount of outstanding tax to increase.

(2) The Tax Payment Slip referred to in paragraph (1) at the minimum contains:
   a. the Taxpayer Identification Number referred to in Article 102 paragraph (3);
   b. the tax account code;
   c. the remittance type code;
   d. the Taxable Period, Fraction of a Tax Year or Tax Year; and
   e. the remitted or paid nominal amount.

(3) In the event that the Tax Payment Slip is used for the payment of:
   a. the Notice of Tax Collection;
   b. the Notice of Tax Underpayment Assessment;
   c. the Notice of Additional Tax Underpayment Assessment;
   d. the Notice of Land and Building Tax Assessment;
   e. the Notice of Land and Building Tax Collection;
   f. the Notice of Tax Due; and
   g. the Amendment Decision Letter, Objection Decision Letter, Mutual Agreement Decision Letter, Appeal Decision as well as Civil Review Decision which cause the amount of outstanding tax to increase,

   the Tax Payment Slip must contain the number of the assessment, decision or ruling.

Article 105

(1) Procedures for the Taxes on Import payment and remittance administered by the Directorate General of Customs and Excise are implemented pursuant to statutory provisions on the Taxes on Import payment and remittance.

(2) The provisions referred to in paragraph (1) shall not apply to the remittance of the Taxes on Imports underpayment collected using a Notice of Tax Collection or Notice of Tax Assessment issued by the Director General of Taxes.

Article 106

(1) The tax payment and remittance referred to in Article 102 are conducted in rupiah.

(2) Excluded from the provisions referred to in paragraph (1) are Taxpayers that:
   a. have obtained a permit to maintain Bookkeeping in English and United States dollars through written application or notification must pay:
      1. Article 25 Income Tax;
      2. Article 29 Income Tax;
      3. the Notice of Tax Collection, Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment and Amendment Decision Letter, Objection Decision Letter, Mutual Agreement Decision Letter, Appeal Decision as well as Civil Review Decision which cause the amount of outstanding tax to increase issued in United States dollars; and
      4. the Tax Deposit used for the payment referred to in number 1 to number 3,

      using United States dollars; and
   b. are appointed as Other Parties residing or domiciled outside the Customs Territory and choosing to implement the obligation to pay and file Electronic Commerce Value Added Tax using United States dollars, must remit the collected Electronic Commerce Value Added Tax using United States dollars.

(3) The tax payment in United States dollars referred to in paragraph (2) to the State Treasury is performed through a Foreign Exchange Tax Payment Bank or other foreign exchange tax payment institutions.

(4) In the event that payment is performed based on the assessment, decision or ruling referred to in paragraph (2) subparagraph a number 3 through the deduction of the Disbursement of Refund Claim, the payment is performed in rupiah using the exchange rate stipulated under the Ministerial Decree applicable on the date:
   a. the assessment is issued;
   b. the decision is issued; or
   c. the ruling is received by the office of the Directorate General of Taxes authorised to implement the ruling.

Article 107

(1) A Taxpayer that conducts tax payment and remittance through the electronic tax payment system is granted a State Revenue Receipt.

(2) The State Revenue Receipt referred to in paragraph (1) is in the form of receipt documents provided by the place of payment, including receipt documents in the electronic format or other documents equivalent to the State Revenue Receipt.

Article 108

Overbooking may be conducted:

a. based on the application by the Taxpayer; or
b. *ex officio*.

Article 109

(1) The Overbooking based on the application by the Taxpayer referred to in Article 108 letter a is submitted to the Director General of Taxes for:
   a. the use of Tax Deposit;
   b. the payment of Income Tax on income from the transfer of the right to land and/or building that has not been examined for the issuance of a certificate of formal examination as proof of fulfilment of the obligation to remit Income Tax;
   c. advance remittance of Stamp Duty that has not been used to top up the deposit balance in the franking machine; and
   d. the amount of payment that is greater than tax payable.

(2) Overbooking may be conducted for the payment of Income Tax, Value Added Tax, Sales Tax on Luxury Goods, Stamp Duty, Land and Building Tax, Sales Tax and Carbon Tax.

(3) Overbooking of the amount of payment that is greater than the tax payable referred to in paragraph (1) subparagraph d cannot be applied for in the event that the payment concerned is:
   a. payment through a Tax Payment Slip equivalent to a Tax Invoice, which cannot be credited pursuant to the provisions under Article 9 paragraph (8) of the Value Added Tax Law;
   b. payment of the remittance of Stamp Duty or payment of the remittance of Stamp Duty in the context of:
      1. the distribution of electronic Stamps to business entities that cooperate with the Money-printing Public Corporation of the Republic of Indonesia to distribute electronic Stamps; and
      2. sales of adhesive Stamps by PT Pos Indonesia (Persero);
   c. tax payment for which the billing code is issued by a billing system other than that administered by the Directorate General of Taxes;
   d. tax payment considered as the filing of Periodic Tax Returns;
   e. tax payment as an integral part of the filing of Tax Returns; or
   f. tax payment that has been set off against tax payable in the Notice of Tax Collection, Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment, Notice of Land and Building Tax Assessment, Notice of Land and Building Tax Collection, Notice of Tax Due and Amendment Decision Letter, Objection Decision Letter, Mutual Agreement Decision Letter, Appeal Decision as well as Civil Review Decision which cause the amount of outstanding tax to increase.

(4) Overbooking may only be conducted between tax payments in the same currency.

(5) The application for Overbooking is submitted by a Taxpayer whose identity is listed in the payment receipt.

(6) Procedures for the submission of the application for Overbooking referred to in paragraph (5) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.
(7) In the event that a Taxpayer conducts a merger, the application for Overbooking for the tax payment and remittance which include the Taxpayer Identification Number of the Taxpayer conducting the merger is submitted no later than before the Taxpayer Identification Number Deregistration of the Taxpayer conducting the merger.
(8) The application for Overbooking for errors in the Income Tax payment or remittance on income from the transfer of the right to land and/or building must be attached with documents indicating the transfer of the right to land and/or building.

Article 110

The *ex officio* Overbooking referred to in Article 108 letter b is conducted on:
a. the Overbooking Receipt that contains errors in the issuance;
b. the tax payment and/or remittance that based on necessary data and information, need to be subject to Overbooking;
c. the Tax Deposit to settle remaining Tax Liabilities at the time Taxpayer Identification Number Deregistration is conducted;
d. the Tax Deposit of the Taxpayer subject to Taxpayer Identification Number Deregistration due to merger to the surviving Taxpayer;
e. the tax payment and/or remittance containing revision to revenue data from the Directorate General of Treasury; and
f. the tax payment and/or remittance as a follow-up to the implementation of confiscation by the bailiffs.

Article 111

(1) The Director General of Taxes issues:
    a. an Overbooking Receipt in the event that the application for Overbooking fulfils the provisions referred to in Article 109 or *ex officio* Overbooking fulfils the provisions referred to in Article 110; or
    b. a notice of rejection for the application for Overbooking in the event that the application for Overbooking does not fulfil the provisions referred to in Article 109.
(2) The date of payment of taxes stated in the Overbooking Receipt refers to the date of payment of taxes in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for which the application for Overbooking is submitted or the date of the Tax Deposit top-up for which the application for Overbooking is submitted.
(3) The Overbooking Receipt referred to in paragraph (1) subparagraph a constitutes the basis for the adjustment to tax payment and remittance conducted by Taxpayers.

Article 112

(1) The Stamps referred to in Article 102 paragraph (1) subparagraph b are in the form of:

a. adhesive Stamps;
b. electronic Stamps; or
c. Stamps in other forms.

(2) The Stamps in other forms referred to in paragraph (1) subparagraph c include:
a. franked Stamps;
b. computerised Stamps;
c. impressed Stamps; and
d. digital Stamps.

(3) In the payment of Stamp Duty using franked Stamps, Taxpayers that have obtained a permit to manufacture franked Stamps must:
a. remit Stamp Duty in advance; and
b. apply for the top-up of the deposit balance in the franking machine,
before affixing the franked Stamps.

(4) The application for the top-up of the deposit balance in the franking machine is submitted with the following provisions:
a. including the serial number of the machine to be subject to the top-up of the deposit balance; and
b. the nominal value of the top-up of the deposit balance amounts to IDR15,000,000.00 (fifteen million rupiah) or multiples thereof.

(5) Based on the application for the top-up of the deposit balance in the franking machine referred to in paragraph (3), the Taxpayer will obtain:
a. an additional deposit balance in the franking machine; or
b. the code that must be input to top-up the deposit balance in the franking machine,
within a maximum period of 3 (three) business days from the date proof of receipt is issued.

(6) The application for the top-up of the deposit balance in a franking machine that does not comply with the provisions referred to in paragraph (4) results in the Stamp franking system failing to produce the top-up of the deposit balance in the franking machine or code referred to in paragraph (5).

(7) The application for the top-up of the deposit balance in the franking machine is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 113

Taxpayers may apply to the Director General of Taxes to pay in instalments or defer tax payments of:
a. the tax underpayment payable based on the Annual Income Tax Return referred to in Article 95 paragraph (1); and
b. the outstanding tax referred to in Article 97 paragraph (3) and the settlement obligation in Article 98 paragraph (1),
in the event that the Taxpayers experience liquidity problems or experience circumstances beyond their control, thereby, the Taxpayers are unable to fulfil their tax obligations on time.

Article 114

(1) The application for the instalment or deferral of tax payments referred to in Article 113 letter a must be submitted using an application letter for the instalment of Article 29 Income Tax payment or the application letter for the deferral of Article 29 Income Tax payment.

(2) In the event that Taxpayers experience liquidity difficulties, the application referred to in paragraph (1) must fulfil the following provisions:
   a. the Taxpayers have filed:
      1. the Annual Income Tax Returns for the last 2 (two) Tax Years; and
      2. Periodic Value Added Tax Returns for the last 3 (three) Taxable Periods,

      as their obligation pursuant to statutory provisions in the field of taxation;
   b. the Taxpayers submit the application letter which lists:
      1. reasons for the submission of the application due to liquidity difficulties; and
      2. the amount of tax underpayment of which the payment is applied for to be paid in instalments, the instalment period and the amount of the instalments or the amount of tax underpayment of which the payment is applied to be deferred and the deferral period;
   c. the application letter referred to in subparagraph b is attached with documents in the form of:
      1. interim financial statements or financial statements for Taxpayers that maintain Bookkeeping; or
      2. records concerning the turnover or gross revenues and/or Gross Income for Taxpayers that maintain recording,

      for the Tax Year for which the application for instalments or deferral is submitted;
      and
   d. the Taxpayers provide guarantee in the form of tangible asset documents, with the following criteria:
      1. owned by the applicant Taxpayers as evidenced by proof of ownership of the tangible assets; and
      2. not currently being used as collateral for debt.

(3) In the event that Taxpayers experience circumstances beyond their control (force majeure), the application referred to in paragraph (1) must fulfil the following provisions:
   a. the Taxpayers have filed:
      1. the Annual Income Tax Returns for the last 2 (two) Tax Years; and
      2. Periodic Value Added Tax Returns for the last 3 (three) Taxable Periods,

      as their obligation pursuant to statutory provisions in the field of taxation.
   b. the Taxpayers submit the application letter which lists:

1. reasons for the submission of the application due to circumstances beyond their control (force majeure); and
2. the amount of tax underpayment of which the payment is applied for to be paid in instalments, the instalment period and the amount of the instalments or the amount of tax underpayment of which the payment is applied to be deferred and the deferral period;

c. the application letter referred to in subparagraph b is attached with documents in the form of a certificate that the Taxpayers experience force majeure from the authority;
and

d. the Taxpayers provide guarantee in the form of tangible asset documents, with the following criteria:
1. owned by the applicant Taxpayers as evidenced by proof of ownership of the tangible assets; and
2. not currently being used as collateral for debt.

(4) The application letter for the instalment of Article 29 Income Tax payment or the application letter for the deferral of Article 29 Income Tax payment referred to in paragraph (1) is submitted no later than before the filing deadline for the Annual Income Tax Return and before the Annual Income Tax Return is filed.

(5) Procedures for the submission of the application for the instalment and deferral of tax underpayment referred to in paragraph (1) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 115

(1) The application for the instalment or deferral of the payment of outstanding tax or the settlement obligation referred to in Article 113 letter b must be submitted using an application letter for the instalment of Tax Liability payment or an application letter for the deferral of Tax Liability payment.

(2) In the event that Taxpayers experience liquidity difficulties, the application referred to in paragraph (1) must fulfil the following provisions:

a. the Taxpayers submit the application letter which lists:
1. reasons for the submission of the application due to liquidity difficulties; and
2. the amount of outstanding tax or settlement obligation of which the payment is applied for to be paid in instalments, the instalment period and the amount of the instalments or the amount of outstanding tax of settlement obligation of which the payment is applied to be deferred and the deferral period;

b. the application letter referred to in subparagraph a is attached with documents in the form of:
1. the statement letter that the Taxpayers experience liquidity difficulties; and

2. bank statements for the last 3 (three) months;
and

c. Taxpayers provide tangible asset guarantees, with the following criteria:
   1. at the minimum amounting to the outstanding tax or the settlement obligation for which the application for the instalment or deferral of tax payment is submitted, as evidenced by documents stating the value of the assets;
   2. owned by the applicant Tax Bearers as evidenced by proof of ownership of the tangible assets; and
   3. not currently being used as collateral for debt.

(3) In the event that Taxpayers experience circumstances beyond their control (force majeure), the application referred to in paragraph (1) must fulfil the following provisions:
   a. the Taxpayers submit the application letter which lists:
      1. reasons for the submission of the application due to force majeure;
      2. the amount of outstanding tax or settlement obligation of which the payment is applied for to be paid in instalments, the instalment period and the amount of the instalments or the amount of outstanding tax or settlement obligation of which the payment is applied to be deferred and the deferral period;
   b. the application letter referred to in subparagraph a is attached with documents in the form of a certificate that the Taxpayers experience force majeure from the authority;
      and
   c. the Taxpayers provide guarantee in the form of tangible asset documents, with the following criteria:
      1. at the minimum amounting to the outstanding tax or the settlement obligation for which the application for the instalment or deferral of tax payment is submitted, as evidenced by documents stating the value of the assets;
      2. owned by the applicant Tax Bearers as evidenced by proof of ownership of the tangible assets; and
      3. not currently being used as collateral for debt.

(4) In the event that an application is submitted for outstanding tax or the settlement obligation referred to in Article 113 letter b related to Land and Building Tax, in addition to fulfilling the provisions referred to in paragraph (2) and paragraph (3), it must also be attached with a copy of the Notice of Land and Building Tax Collection for which the instalment or deferral of tax payment is applied for.

(5) In the event that the required documents referred to in paragraph (4) are available and validated in the administration system of the Directorate General of Taxes, the documents concerned do not have to be attached as attachments to the application.

(6) In the event that the application is submitted for the Notice of Tax Underpayment Assessment and Notice of Additional Tax Underpayment

Assessment referred to in Article 98 paragraph (1), the following provisions shall apply:

a. the Taxpayer agrees to the entire amount of outstanding tax in the Closing Conference;
b. there is a value not agreed upon in the Closing Conference and the Taxpayer does not apply for an objection until the filing due date of the objection; or
c. the Taxpayer applies for an objection but does not file an appeal.

(7) The tangible asset guarantee referred to in paragraph (2) subparagraph c and paragraph (3) subparagraph c is submitted to the Director General of Taxes no later than 3 (three) business days after the application is submitted.

(8) The application referred to in paragraph (1) may be submitted by the Taxpayer no later than before the application for an auction of the confiscated goods for the settlement of Tax Liabilities in the form of outstanding tax or the settlement obligation referred to in Article 113 letter b is submitted in writing by the officials for central tax collection to the Government Agency authorised to organise the auction.

(9) In the event that the officials for central tax collection have applied for an auction of the confiscated goods and after the auction is implemented for the settlement of tax liabilities in the form of outstanding tax or the settlement obligation referred to in Article 113 letter b, there are remaining tax liabilities, the Taxpayers may apply for the instalment or deferral of the remaining tax liabilities.

(10) Procedures for the application for the instalment or deferral referred to in paragraph (1) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 116

(1) In the event that for the application by the Taxpayer to instal or defer tax payment, no decision has been issued and for the Taxpayer concerned, a notice of assessment/decision/ruling is issued resulting in the tax overpayment and/or the granting of interest compensation, the tax overpayment and/or the granting of interest compensation shall be set off to first settle the outstanding tax or the settlement obligation referred to in Article 113 letter b, pursuant to statutory provisions in the field of taxation.

(2) In the event that the amount of tax overpayment and/or interest compensation is insufficient to settle the outstanding tax or the settlement obligation for which an application for instalment or deferral is submitted referred to in Article 113 letter b, the amount of outstanding tax or the settlement obligation constituting the basis for the granting of the decision on the instalment or deferral is the amount of outstanding tax or the settlement obligation after being deducted by the tax overpayment and/or interest compensation referred to in paragraph (1).

Article 117

(1) Based on the application for the deferral or instalment of tax payment, the Director General of Taxes examines the fulfilment of the requirements referred to in Article 114 and Article 115.
(2) Based on the examination referred to in paragraph (1), the Director General of Taxes grants a decision within a maximum period of:
    a. 3 (three) business days after the proof of receipt is issued for the application for the instalment or deferral of tax payment referred to in Article 114 paragraph (1); and
    b. 7 (seven) business days after the proof of receipt is issued for the application for the instalment or deferral of tax payment referred to in Article 115 paragraph (1).
(3) The decision referred to in paragraph (2) may be in the form of approval or rejection of the application.
(4) The approval in the form of an approval of the instalment or deferral of tax payment decision letter may be granted for a maximum period of:
    a. until the filing deadline for the Annual Income Tax Return for the following Tax Year, for the decision on the application referred to in Article 114; or
    b. 24 (twenty-four) months from the time the approval letter for the instalment or deferral is issued for the decision on the application referred to in Article 115.
(5) The amount of payment of the instalment of tax payment in the approval of the instalment of tax payment decision letter referred to in paragraph (3) is determined in an equal amount for each instalment per month.
(6) The amount of the settlement for the deferral of tax payment in the approval of the deferral of tax payment decision letter referred to in paragraph (3) is determined to amount to the tax payment whose settlement is deferred.
(7) If the period referred to in paragraph (2) has elapsed and the Director General of Taxes has not granted a decision, the application is approved according to the application by the Taxpayer and the decision on approval of the instalment of tax payment or the decision on approval of the deferral of tax payment must be issued no later than 3 (three) business days after the period ends.
(8) The decision referred to in paragraph (3) is submitted to the Taxpayer pursuant to the provisions referred to in Article 12.

Article 118

The approval of the instalment or deferral of tax payment decision letter for the application referred to in Article 115 becomes invalid and tax collection measures are conducted in the event that the Taxpayer does not fulfil the tax payment based on:

a. the approval of the instalment decision letter for a maximum of 2 (two) times; or
b. the approval of the deferral decision letter according to the deferral period.

Article 119

(1) In the event that after the approval of the instalment or deferral of tax payment decision letter is issued for the application referred to in Article 115, a notice of assessment/decision/ruling is issued resulting in the tax overpayment and/or granting of interest compensation, the tax overpayment and/or granting of interest compensation must first be set off against the remaining outstanding tax or the settlement obligation referred to in Article 113 letter b that has not been paid in instalments or whose payment is deferred pursuant to statutory provisions in the field of taxation.

(2) In the event that for the outstanding tax or the settlement obligation referred to in Article 113 letter b, an approval of the instalment or deferral of tax payment decision letter has been issued and the outstanding tax or the settlement obligation:
   a. is set off against the tax overpayment and/or the granting of interest compensation referred to in paragraph (1) and there is remaining outstanding tax or settlement obligation; or
   b. a decision or ruling is issued that causes the amount of outstanding tax or the settlement obligation to be reduced,

   the Director General of Taxes issues a notice of re-assessment of the approval of the instalment or deferral of tax payment decision.

(3) The notice of re-assessment of the approval of the instalment or deferral of tax payment decision referred to in paragraph (2) is submitted to the Taxpayer pursuant to the provisions referred to in Article 12.

Article 120

(1) In the event that a Taxpayer files an objection against a Notice of Tax Assessment whose settlement has been approved to be paid in instalments or deferred, the Taxpayer is required to settle all outstanding tax agreed upon in the Closing Conference, before the objection is filed.

(2) The filing of the objection referred to in paragraph (1) results in the approval of the instalment or deferral of tax payment decision letter of the application referred to in Article 115 becoming invalid.

(3) In the event that a Taxpayer files an objection, reduction, amendment, appeal or civil review of an assessment or decision related to outstanding Land and Building Tax referred to in Article 97 paragraph (3) whose settlement has been approved to instal or defer tax payment, the approval to pay in instalments or defer tax payment remains valid and the Taxpayer is required to settle according to the schedule that has been determined.

Article 121

(1) In the event that for a Taxpayer, an approval of the instalment or deferral of tax payment decision letter is issued for the application referred to in:
   a. Article 114; and
   b. Article 115 for the Notice of Tax Underpayment Assessment as well as Notice of Additional Tax Underpayment Assessment and Objection Decision Letter, Amendment Decision Letter, Appeal Decision as well

as Civil Review Decision which cause the amount of outstanding tax to increase,

the Taxpayer is subject to an administrative penalty in the form of interest stipulated under Article 19 paragraph (2) of the General Provisions and Tax Procedures Law, calculated from the payment due date until the payment of instalment or settlement.

(2) In the event that for a Taxpayer, an approval of the instalment or deferral of tax payment decision letter is issued for the application referred to in Article 115 related to the Notice of Land and Building Tax Collection, the Taxpayer is subject to an administrative fine of 2% (two per cent) per month as stipulated under Article 11 paragraph (3) of the Land and Building Tax Law.

(3) The administrative fine referred to in paragraph (2) is calculated from the due date of the Notice of Land and Building Tax Collection referred to in Article 97 paragraph (3) until the date of settlement for the instalment or deferral.

(4) The imposition of the administrative fine referred to in paragraph (2) does not exceed a maximum period of 24 (twenty-four) months from the due date of the Notice of Tax Due or the Notice of Land and Building Tax Assessment referred to in Article 97 paragraph (1) and paragraph (2).

(5) The administrative penalty referred to in paragraph (1) and administrative fine referred to in paragraph (2) arising due to the issuance of:

a. the approval of the instalment of tax payment decision letter shall be calculated based on the balance of outstanding tax or the settlement obligation referred to in Article 113 letter b for which the application for instalment is submitted for each instalment payment period; or

b. the approval of the deferral of tax payment decision letter shall be calculated based on the amount of outstanding tax or the settlement obligation referred to in Article 113 letter b for which the application for deferral is submitted.

(6) The outstanding tax referred to in paragraph (5) for the calculation of the Land and Building Tax administrative fines is the amount of outstanding Land and Building Tax payable in the Notice of Tax Due or Notice of Land and Building Tax Assessment.

(7) The administrative penalty in the form of interest referred to in paragraph (1) is collected by issuing a Notice of Tax Collection.

(8) The administrative fine referred to in paragraph (2) is collected by issuing a Notice of Land and Building Tax Collection.

(9) The administrative penalty in the form of interest referred to in paragraph (1) is not imposed on the instalment or deferral of the Notice of Tax Collection.

(10) The administrative fine referred to in paragraph (2) is not imposed on the instalment or deferral of the payment of a Notice of Land and Building Tax Collection that only contains an administrative fine.

Section Two
Procedures for the Refund of Tax Overpayments that Should Not Otherwise Be Payable

Article 122

(1) The application for the refund of tax overpayment that should not otherwise be payable may be submitted in the event that:
   a. there is tax payment not constituting a taxable object that is payable or should not otherwise be payable;
   b. there is tax overpayment by the Taxpayer related to Taxes on Import;
   c. there are errors in the withholding or collection resulting in the withheld or collected tax being greater than the tax that should be withheld or collected;
   d. there are errors in the withholding or collection that:
      1. does not constitute a taxable object; or
      2. the taxable object and/or tax subject that obtains tax facilities; or
   e. there is over-withholding or over-collection of Income Tax related to the application of the Tax Treaty to non-tax residents.

(2) The types of taxes for which the application for the refund of tax overpayment that should not otherwise be payable referred to in paragraph (1) may be submitted, include:
   a. Income Tax;
   b. Value Added Tax;
   c. Sales Tax on Luxury Goods;
   d. Land and Building Tax;
   e. Stamp Duty;
   f. Sales Tax; and
   g. Carbon Tax.

(3) In addition to the types of taxes referred to in paragraph (2), for the Tax Deposit payment that is not used for the settlement of tax payable, the application for the refund of tax overpayment that should not otherwise be payable may also be submitted.

Article 123

The tax payment not constituting a taxable object that is payable or should not otherwise be payable referred to in Article 122 paragraph (1) subparagraph a may be in the form of:

a. the payment of tax which is greater than tax payable;
b. the payment of tax for cancelled transactions;
c. the payment of tax that should not otherwise be paid;
d. the payment of tax in the context of settlement stipulated under Article 44B of the General Provisions and Tax Procedures Law that:
   1. there is still tax overpayment after there is a decision on investigation termination;

2. is not recognised as a consideration to be prosecuted without being accompanied by the sentence to imprisonment based on a court decision with permanent legal force;
3. is not recognised as payment of a criminal fine imposed on the defendant based on a court decision with permanent legal force; and/or
4. using a Taxpayer Identification Number other than the Taxpayer Identification Number of the suspect after the suspect is determined insofar as the responsibility for the suspect and evidence has not been handed over to the public prosecutor.

e. the payment of final Income Tax on business income received or accrued by Taxpayers with a certain gross turnover stipulated under the government regulation stipulating Income Tax on business income received or accrued by Taxpayers with a certain gross turnover that should not otherwise be subject to Income Tax; or

f. remittance in advance of Stamp Duty that has not been used and/or is remaining pursuant to statutory provisions stipulating Stamp Duty.

Article 124

(1) The refund of tax payment referred to in Article 123 may be requested by the payor concerned by submitting an application.

(2) The payor referred to in paragraph (1) includes:
   a. individual Taxpayers; and
   b. Corporate Taxpayers, including Government Agencies.

(3) The application for the refund is submitted in writing in the Indonesian language.

(4) The application for the refund of the tax payment referred to in Article 123 letter a, letter b, letter c, letter e and letter f must be attached with documents in the form of:
   a. the calculation of tax that should not otherwise be payable; and/or
   b. reasons for the application for the refund of tax overpayment that should not otherwise be payable.

(5) The application for the refund of the tax payment referred to in Article 123 letter d must be attached with documents in the form of:
   a. the calculation of tax that should not otherwise be payable;
   b. reasons for the application for the refund of tax overpayment that should not otherwise be payable;
   c. the certificate from the investigators and notice of termination of investigation for the application for the refund of the tax payment referred to in Article 123 letter d point 1;
   d. the certificate from the investigators and the court decision with permanent legal force for the application for the refund of the tax payment referred to in Article 123 letter d point 2 and/or point 3; and/or
   e. the certificate from the investigators stating that there have been errors in the payment and the responsibility for the suspect and evidence has not been handed over to the public prosecutor for the

application for the refund of the tax payment referred to in Article 123 letter d point 4.

(6) Procedures for the submission of the application for the refund of the tax payment referred to in paragraph (4) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 125

(1) The Director General of Taxes examines the correctness of the tax payment based on the application for the refund referred to in Article 124.
(2) In the context of examining the correctness of the tax payment, the Director General of Taxes may request documents and/or details from the applicant.
(3) The results of the examination in the form of a refund shall be granted if fulfilling the following provisions:
    a. the tax that should not otherwise be payable has been paid to the State Treasury; and
    b. the tax that should not otherwise be payable has been paid as referred to in subparagraph a is not credited in the Tax Return.
(4) The examination referred to in paragraph (1) is outlined in the examination results report.
(5) In the event that based on the examination results report, there is tax overpayment that should not otherwise be payable, the Director General of Taxes issues the Notice of Tax Overpayment Assessment.
(6) In the event that based on the examination results report, there is no tax overpayment that should not otherwise be payable, the Director General of Taxes notifies the rejection of the application for the refund of tax overpayment that should not otherwise be payable to the applicant pursuant to the provisions referred to in Article 12.

Article 126

The tax overpayment related to Taxes on Imports referred to in Article 122 paragraph (1) subparagraph b includes import Article 22 Income Tax, import Value Added Tax and/or import Sales Tax on Luxury Goods that have been paid and listed in:

a. the Notice of Tariff and/or Customs Value Assessment or Notice of Tariff and/or Customs Value Re-assessment;
b. the Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports, Notice of Tariff and/or Customs Value Assessment or Notice of Customs Assessment for which an objection decision has been issued;
c. the Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports, Notice of Tariff and/or Customs Value Assessment or Notice of Customs Assessment for which an objection decision and appeal decision have been issued;
d. the Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports, Notice of Tariff and/or Customs Value

Assessment or Notice of Customs Assessment for which an objection decision, appeal decision and civil review decision have been issued;

e. the Notice of Tariff and/or Customs Value Re-assessment for which an appeal decision has been issued;

f. the Notice of Tariff and/or Customs Value Re-assessment for which an appeal decision and civil review decision have been issued; and

g. documents containing the cancellation of import that have been approved by the competent authority,

resulting in the tax overpayment.

Article 127

(1) The refund of the tax overpayment by the Taxpayers referred to in Article 126 may be requested by Taxpayers concerned by submitting an application.

(2) The Taxpayers referred to in paragraph (1) include individual Taxpayers and Corporate Taxpayers, including Government Agencies.

(3) The application for the refund is submitted in writing in the Indonesian language.

(4) The application for the refund must be attached with documents in the form of:

a. a copy of tax payment receipt in the form of the Customs, Excise and Tax Payment Slip or other administrative means equivalent to the Customs, Excise and Tax Payment Slip;

b. a copy of Notice of Tariff and/or Customs Value Assessment, Notice of Tariff and/or Customs Value Re-assessment, Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports, Notice of Customs Assessment or documents containing the cancellation of import that have been approved by the competent authority;

c. a copy of the objection decision, appeal decision and/or civil review decision related to the Notice of Tariff and/or Customs Value Assessment, Notice of Tariff and/or Customs Value Re-assessment, Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports, Notice of Customs Assessment, in the event that an objection, appeal and/or civil review is filed against the Notice of Tariff and/or Customs Value Assessment, Notice of Tariff and/or Customs Value Re-assessment, Notice of Underpayment of Import Duty, Excise, Administrative Fines, Interest and Taxes on Imports and/or Notice of Customs Assessment;

d. the calculation of tax that should not otherwise be payable; and

e. reasons for the application for the refund of tax overpayment that should not otherwise be payable.

(5) Procedures for the submission of the application for the refund referred to in paragraph (4) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 128

(1) The Director General of Taxes examines the correctness of the tax payment based on the application for the refund referred to in Article 127.
(2) To examine the correctness of the tax payment, the Director General of Taxes may request documents and/or details from the applicant.
(3) The results of the examination in the form of a refund shall be granted in the event that the following provisions are fulfilled:
    a. the tax that should not otherwise be payable has been paid or remitted to the State Treasury;
    b. in the event that the tax that has been paid or remitted referred to in subparagraph a is related to import Article 22 Income Tax, the tax is not credited in the Annual Income Tax Return;
    c. in the event that the tax that has been paid or remitted referred to in subparagraph a is related to import Value Added Tax and the Annual Tax Return for the Tax Year the payment occurs has been filed, the tax is not credited in the Periodic Value Added Tax Return, is not charged to expenses in the Annual Income Tax Return or not capitalised in the acquisition cost; and
    d. in the event that the tax that has been paid or remitted referred to in subparagraph a is related to import Sales Tax on Luxury Goods, the tax is not charged to expenses in the Annual Income Tax Return or not capitalised in the acquisition cost.
(4) The examination referred to in paragraph (1) is outlined in the examination results report.
(5) In the event that based on the examination results report, there is tax overpayment that should not otherwise be payable, the Director General of Taxes issues the Notice of Tax Overpayment Assessment.
(6) In the event that based on the examination results report, there is no tax overpayment that should not otherwise be payable, the Director General of Taxes notifies the rejection of the application for the refund of tax overpayment that should not otherwise be payable to the applicant pursuant to the provisions referred to in Article 12.

Article 129

(1) Errors in the withholding or collection resulting in the withheld or collected tax being greater than the tax that should otherwise be withheld or collected referred to in Article 122 paragraph (1) subparagraph c may be in the form of:
    a. Withholding Tax or Income Tax collection resulting in Withholding Tax or collected Income Tax being greater than the Income Tax that should be withheld or collected;
    b. Withholding Tax or Income Tax collection on income received by non-tax subjects;
    c. Value Added Tax collection that is greater than the tax that should be collected;
    d. Sales Tax on Luxury Goods collection that is greater than the tax that should be collected; or

e. Stamp Duty collection that is greater than Stamp Duty that should be collected.

(2) Errors in the withholding or collection referred to in Article 122 paragraph (1) subparagraph d may be in the form of:
   a. Withholding Tax or Income Tax collection that should not otherwise be withheld or not collected;
   b. Value Added Tax collection that should not otherwise be collected; or
   c. Sales Tax on Luxury Goods collection that should not otherwise be collected, including:
      1. granted the exemption or exclusion from Sales Tax on Luxury Goods on imports or supplies of Taxable Luxury Goods; or
      2. exports of Taxable Luxury Goods whose Sales Tax on Luxury Goods on the acquisition has been paid.

Article 130

(1) In the event of errors in the withholding tax or tax collection referred to in Article 129 related to Income Tax, the refund of the tax that should not otherwise be withheld or not collected may be requested by the withholding or collection agent by submitting an application.
(2) In the event of errors in the collection referred to in Article 129 related to Value Added Tax, the refund of the tax that should not otherwise be collected may be requested by the party subject to the collection.
(3) In the event that the incorrectly collected Value Added Tax referred to in paragraph (2) has been credited as Input VAT, the refund for Value Added Tax is deemed to have been requested by the party subject to the collection.
(4) In the event that the incorrectly collected Value Added Tax referred to in paragraph (2) has not been:
   a. credited as Input VAT;
   b. charged to expenses; and
   c. capitalised in the acquisition cost,

   and Periodic Value Added Tax Returns of the supplier may no longer be amended, the refund for the incorrectly collected Value Added Tax may be requested by the party subject to the collection by submitting an application.
(5) In the event of errors in Value Added Tax collection by a Value Added Tax Collection Agent, the refund of the tax that should not otherwise be collected may be requested by the party subject to the collection by submitting an application.
(6) In the event that the incorrectly collected Value Added Tax referred to in paragraph (5) has been set off against the Output VAT by a Value Added Tax Collection Agent constituting a Taxable Person, the refund of Value Added Tax is deemed to have been requested by the party subject to the collection.
(7) In the event of errors in Value Added Tax collection by Other Parties, the refund of the tax that should not otherwise be collected may be requested by Other Parties by submitting an application.

(8) In the event that the incorrectly collected Value Added Tax referred to in paragraph (7) has not been:
   a. credited as Input VAT;
   b. charged to expenses; and
   c. capitalised in the acquisition cost,

   and Periodic Value Added Tax Returns of the supplier may no longer be amended, the refund for the incorrectly collected Value Added Tax may be requested by the party subject to the collection by submitting an application.

(9) In the event of errors in Value Added Tax collection on foreign missions and international bodies as well as their officials that are exempt from Value Added Tax, the refund of Value Added Tax may be requested by the party receiving the acquisition.

(10) In the event of errors in the tax collection related to Sales Tax on Luxury Goods, the refund for the tax that should not otherwise be collected may be requested through the submission of the application by:
   a. the party conducting the supply;
   b. the party receiving the acquisition; or
   c. the party conducting the export,

   pursuant to statutory provisions in the field of taxation.

(11) In the event that the Taxpayer performing the withholding or collection referred to in paragraph (1):
   a. cannot be found that may be in the form of dissolution of the business; or
   b. cannot amend the Tax Returns,

   the application is submitted by the withholdee or the party subject to the collection.

(12) Tax Returns that cannot be amended referred to in paragraph (4), paragraph (8) and paragraph (11) include:
   a. the Tax Returns have been subject to Audit measures; and
   b. loss or overpayment Tax Returns filed past a period of 2 (two) years before the statute of limitation stipulated under Article 8 paragraph (1a) of the General Provisions and Tax Procedures Law.

Article 131

(1) The application for the refund referred to in Article 130 is submitted in writing or electronically in the Indonesian language.

(2) The application for the refund submitted by the withholding or collection agent referred to in Article 130 paragraph (1) and the withholdee or the party subject to the collection referred to in Article 130 paragraph (11) must be attached with documents in the form of:
   a. the calculation of tax that should not otherwise be payable;
   b. reasons for the application for the refund of tax overpayment that should not otherwise be payable;
   c. the withholding tax or collection receipt or other documents equivalent to the withholding or collection receipt;

d. the power of attorney from the withholdee or the party subject to the collection in the event that the application is submitted by a withholding or collection agent; and
e. the statement letter from the non-tax resident that the tax requested for refund has not been set off against tax payable overseas and/or has not been charged to expenses in the calculation of taxable income overseas, in the event of errors in the withholding or collection on the non-tax resident.

(3) The application for the refund referred to in Article 130 paragraph (2), paragraph (4), paragraph (5), paragraph (7), paragraph (8), paragraph (9) and paragraph (10) must be attached with documents in the form of:
a. the calculation of tax that should not otherwise be payable;
b. reasons for the application for the refund of tax overpayment that should not otherwise be payable;
c. the Tax Invoice or certain documents equivalent to the Tax Invoice constituting proof of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods collection;
d. export documents in the event of exports of Taxable Luxury Goods; and
e. other documents pursuant to the Ministerial regulation stipulating the exemption from Value Added Tax and/or Sales Tax on Luxury Goods, subject to Value Added Tax but not collected or the exclusion from Sales Tax on Luxury Goods.

(4) In the event that the required documents referred to in paragraph (2) and paragraph (3) are available and validated in the administration system of the Directorate General of Taxes, the documents concerned do not have to be attached as attachments to the application.

(5) Procedures for the submission of the application for the refund referred to in paragraph (1) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 132

(1) The Director General of Taxes examines the correctness of the tax payment based on the application for the refund referred to in Article 131.

(2) In the context of examining the correctness of the tax payment, the Director General of Taxes may request documents and/or details from the applicant.

(3) The results of the examination in the form of the refund related to Withholding Tax or Income Tax collection referred to in Article 130 paragraph (1) and paragraph (11) are granted in the event that the following provisions are fulfilled:
a. the tax that should not otherwise be payable has been remitted to the State Treasury;
b. in the event that the tax that has been remitted referred to in subparagraph a is related to non-final Withholding Tax or Income Tax

collection, the Income Tax is not credited in the Annual Income Tax Return of the Taxpayer subject to the withholding or collection;

c. the withheld or collected tax has been filed by the withholding or collection agent in the Periodic Tax Returns of the withholding or collection agent Taxpayer;
d. against the withheld or collected tax, no objection is filed by the Taxpayer subject to the withholding or collection stipulated under Article 25 paragraph (1) subparagraph e of the General Provisions and Tax Procedures Law; and
e. the tax that has been remitted referred to in subparagraph a is not set off against the tax on the non-tax resident payable overseas and is not charged to expenses in the calculation of taxable income of the non-tax resident overseas in the event that the withholdee or the party subject to the collection is a non-tax resident.

(4) The results of the examination in the form of the refund related to Value Added Tax collection referred to in Article 130 paragraph (2), paragraph (4), paragraph (5), paragraph (7), paragraph (8) and paragraph (9) are granted in the event that:
a. the tax that should not otherwise be payable has been remitted to the State Treasury;
b. the tax that has been remitted referred to in subparagraph a is not credited in the Periodic Value Added Tax Returns, is not charged to expenses in the Annual Income Tax Return or not capitalised in the acquisition cost;
c. the collected tax has been filed by the Taxable Person, Value Added Tax Collection Agent or Other Parties in Periodic Value Added Tax Returns Taxpayers Value Added Tax Collection Agent or Other Parties;
d. against the collected tax, no objection is filed by the Taxpayer subject to the collection stipulated under Article 25 paragraph (1) subparagraph e of the General Provisions and Tax Procedures Law; and
e. the provisions stipulated under the Ministerial regulation concerning the exemption from subject to Value Added Tax but not collected or exempt from Value Added Tax are fulfilled.

(5) The results of the examination in the form of the refund related to Sales Tax on Luxury Goods collection referred to in Article 130 paragraph (10) are granted in the event that:
a. the tax that should not otherwise be payable has been remitted to the State Treasury;
b. the tax that has been remitted referred to in subparagraph a is not expensed in the Annual Income Tax Return of the Taxpayer subject to the collection or not capitalised in the acquisition cost;
c. the collected tax has been filed by the Taxable Person in Periodic Value Added Tax Returns of the Taxable Person;
d. against the collected tax, no objection is filed by the Taxpayer subject to the collection stipulated under Article 25 paragraph (1)

subparagraph e of the General Provisions and Tax Procedures Law; and

e. the provisions stipulated under the Ministerial regulation concerning the exemption from Sales Tax on Luxury Goods or the exclusion from Sales Tax on Luxury Goods are fulfilled.

(6) The examination referred to in paragraph (1) is outlined in the examination results report.

(7) In the event that based on the examination results report, there is tax overpayment that should not otherwise be payable, the Director General of Taxes issues the Notice of Tax Overpayment Assessment.

(8) In the event that based on the examination results report, there is no tax overpayment that should not otherwise be payable, the Director General of Taxes notifies the rejection of the application for the refund of tax overpayment that should not otherwise be payable to the applicant pursuant to the provisions referred to in Article 12.

(9) In the event that for the application for tax overpayment that should not otherwise be payable, the Notice of Tax Overpayment Assessment has been issued to the non-tax resident, the Director General of Taxes sends information to the tax authority of the country of residence of the non-tax resident pursuant to statutory provisions in the field of taxation.

Article 133

The over-withholding or over-collection of Income Tax related to the application of the Tax Treaty to non-tax residents referred to in Article 122 paragraph (1) subparagraph e is due to:

a. misapplication of the Tax Treaty;

b. delay in the fulfilment of administrative requirements to apply the Tax Treaty after withholding or collection occurs; or

c. Mutual Agreement.

Article 134

(1) In the event of over-withholding or over-collection of Income Tax on a non-tax resident as referred to in Article 133, the refund for the tax that should not otherwise be withheld or not collected may be requested by the withholding or collection agent Taxpayer by submitting an application.

(2) In the event that the Taxpayer performing the withholding or collection referred to in paragraph (1):

a. cannot be found that may be in the form of dissolution of the business; or

b. cannot amend the Tax Returns,

the application is submitted by the non-tax resident.

Article 135

(1) The application referred to in Article 134 paragraph (1) and paragraph (2) is submitted in writing in the Indonesian language.

(2) The application referred to in paragraph (1) must be attached with documents in the form of:

a. the calculation of tax that should not otherwise be payable;
b. reasons for the application for the refund of tax overpayment that should not otherwise be payable;
c. the withholding tax or collection receipt or other documents equivalent to the withholding or collection receipt;
d. the power of attorney from the non-tax resident subject to the withholding or collection in the event that the application is submitted by a withholding or collection agent;
e. the statement letter from the non-tax resident that the tax requested for refund has not been set off against tax payable overseas and/or has not been charged to expenses in the calculation of taxable income overseas;
f. the Certificate of Domicile of Non-Resident Taxpayer pursuant to statutory provisions in the field of taxation;
g. a copy of the Mutual Agreement Decision Letter, in the event that the over-withholding or over-collection is due to the Mutual Agreement referred to in Article 133 letter c; and
h. supporting documents for the non-tax resident receiving or accruing income related to the Tax Treaty.

(3) Procedures for the submission of the application for the refund referred to in paragraph (1) are implemented pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 136

(1) The Director General of Taxes examines the correctness of the tax payment based on the application for the refund referred to in Article 135.
(2) In the context of examining the correctness of the tax payment, the Director General of Taxes may request documents and/or details from the applicant.
(3) The results of the examination in the form of a refund shall be granted in the event that the following provisions are fulfilled:
a. the tax that should not otherwise be payable has been remitted to the State Treasury;
b. the withheld or collected tax has been filed in the Periodic Tax Returns of the withholding or collection agent Taxpayer;
c. the tax that has been remitted referred to in subparagraph a is not set off against the tax on the non-tax resident payable overseas;
d. the tax that has been remitted referred to in subparagraph a is not charged to expenses in the calculation of taxable income of the non-tax resident overseas; and
e. abuse of the Tax Treaty by the non-tax resident is not found, in the event of the application referred to in Article 133 letter a, and letter b.
(4) The examination referred to in paragraph (1) is outlined in the examination results report.

(5) In the event that based on the examination results report, there is tax overpayment that should not otherwise be payable, the Director General of Taxes issues the Notice of Tax Overpayment Assessment.
(6) In the event that based on the examination results report, there is no tax overpayment that should not otherwise be payable, the Director General of Taxes notifies the rejection of the application for the refund of tax overpayment that should not otherwise be payable pursuant to the provisions referred to in Article 12.
(7) In the event that for the application for tax overpayment that should not otherwise be payable, the Notice of Tax Overpayment Assessment has been issued, the Director General of Taxes sends information to the tax authority of the country of residence of the non-tax resident pursuant to statutory provisions in the field of taxation.

Article 137

(1) The Director General of Taxes issues:
   a. the Notice of Tax Overpayment Assessment referred to in Article 125 paragraph (5), Article 128 paragraph (5), Article 132 paragraph (7) and Article 136 paragraph (5); or
   b. the notice of rejection of the application for the refund of tax overpayment that should not otherwise be payable referred to in Article 125 paragraph (6), Article 128 paragraph (6), Article 132 paragraph (8) and Article 136 paragraph (6),

   no later than 3 (three) months from the time the application for the refund of tax overpayment that should not otherwise be payable is received.
(2) In the event that until the end of the deadline referred to in paragraph (1), the Director General of Taxes does not issue the Notice of Tax Overpayment Assessment or notification of rejection of the application for the refund of tax overpayment that should not otherwise be payable, the application by the Taxpayer is deemed granted and the Director General of Taxes issues the Notice of Tax Overpayment Assessment.
(3) The Notice of Tax Overpayment Assessment referred to in paragraph (2) is issued by the Director General of Taxes no later than 5 (five) business days from the time the issuance deadline for the Notice of Tax Overpayment Assessment referred to in paragraph (1) expires.

Section Three
Procedures for the Granting of Interest Compensation

Article 138

(1) The interest compensation related to Income Tax, Value Added Tax and Sales Tax on Luxury Goods is granted to the Taxpayer in the event of:
   a. a delay in the tax refund stipulated under Article 11 paragraph (3) of the General Provisions and Tax Procedures Law;
   b. a delay in the issuance of the Notice of Tax Overpayment Assessment stipulated under Article 17B paragraph (3) of the General Provisions and Tax Procedures Law;

c. a delay in the issuance of the Notice of Tax Overpayment Assessment stipulated under Article 17B paragraph (4) of the General Provisions and Tax Procedures Law;
d. a tax overpayment due to the filing of an objection, application for an appeal or application for civil review, granted in part or in full as stipulated under Article 27B paragraph (1) of the General Provisions and Tax Procedures Law; or
e. a tax overpayment due to the Amendment Decision Letter, the reduction or cancellation of the Notice of Tax Assessment decision letter or reduction or cancellation of the Notice of Tax Collection decision letter that partly or entirely grants the application by the Taxpayer stipulated under Article 27B paragraph (3) of the General Provisions and Tax Procedures Law, except for:
    1. the tax overpayment due to the Amendment Decision Letter that is related to Mutual Agreement; or
    2. the tax overpayment due to the cancellation of the Notice of Tax Assessment decision letter stipulated under Article 36 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law.

(2) The interest compensation referred to in paragraph (1) subparagraph d is granted to tax overpayment amounting to a maximum of the overpayment amount approved by the Taxpayer in the Closing Conference for the Tax Return stating an overpayment for which the following has been issued:
a. the Notice of Tax Underpayment Assessment;
b. the Notice of Additional Tax Underpayment Assessment;
c. the Notice of Tax Overpayment Assessment; or
d. the Notice of Nil Tax Assessment.

(3) The amount of overpayment approved by the Taxpayer in the Closing Conference referred to in paragraph (2) is the overpayment amount according to the Taxpayer submitted by the Taxpayer at the time of the Closing Conference.

(4) The Tax Return stating an overpayment referred to in paragraph (2) is a Tax Return stating an overpayment with the application for the tax refund.

(5) The interest compensation referred to in paragraph (1) subparagraph d is not granted to tax overpayment due to the issuance of the Objection Decision Letter, Appeal Decision or Civil Review Decision, sourced from payments of the Notice of Tax Underpayment Assessment or Notice of Additional Tax Underpayment Assessment, either those that are approved or not approved by the Taxpayer in the Closing Conference.

Article 139

(1) The interest compensation related to Land and Building Tax is granted to the Taxpayer in the event that there is a delay in the Land and Building Tax refund.

(2) The delay in the Land and Building Tax refund referred to in paragraph (1), is the delay in the issuance of the Tax Refund Decision Letter

stipulated under Article 11 paragraph (3) of the General Provisions and Tax Procedures Law for:

a. the Notice of Tax Overpayment Assessment;
b. the Objection Decision Letter;
c. the Appeal Decision or Civil Review Decision;
d. the Land and Building Tax Reduction Decision Letter;
e. the Land and Building Tax Administrative Fine Reduction Decision Letter;
f. the Amendment Decision Letter;
g. the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter;
h. the Tax Assessment Reduction Decision Letter for the Notice of Tax Due or Notice of Land and Building Tax Assessment; or
i. the Tax Assessment Cancellation Decision Letter for the Notice of Tax Due, Notice of Land and Building Tax Assessment or Notice of Land and Building Tax Collection.

Article 140

(1) The interest compensation due to the delay in the tax refund referred to in Article 138 paragraph (1) subparagraph a is granted at the monthly interest rate stipulated by the Minister, of the tax overpayment amount.
(2) The number of months as the basis for the granting of interest compensation referred to in paragraph (1) is calculated from the time the issuance deadline for the Tax Refund Decision Letter ends until the date of issuance of the Tax Refund Decision Letter.
(3) The issuance deadline for the Tax Refund Decision Letter referred to in paragraph (2) is no later than 1 (one) month from the time:
    a. the application for the tax refund is received in connection with the issuance of the Notice of Tax Overpayment Assessment as stipulated under Article 17 paragraph (1) of the General Provisions and Tax Procedures Law;
    b. the Notice of Tax Overpayment Assessment is issued as stipulated under Article 17 paragraph (2) or Article 17B of the General Provisions and Tax Procedures Law;
    c. the Preliminary Tax Refund Decision Letter is issued to Taxpayers with certain criteria stipulated under Article 17C of the General Provisions and Tax Procedures Law, Taxpayers that fulfil certain requirements stipulated under Article 17D of the General Provisions and Tax Procedures Law and low-risk Taxable Persons stipulated under Article 9 paragraph (4c) of the Value Added Tax Law;
    d. the Objection Decision Letter, Amendment Decision Letter, Administrative Penalty Reduction Decision Letter, Administrative Penalty Nullification Decision Letter, the reduction or cancellation of the Notice of Tax Assessment decision letter, reduction or cancellation of the Notice of Tax Collection decision letter or Interest Compensation Decision Letter is issued, resulting in the tax overpayment; or

e. the Appeal Decision or Civil Review Decision is received by the office of the Directorate General of Taxes authorised to implement the Court Decision, resulting in the tax overpayment.

(4) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(5) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date the calculation of interest compensation starts.

Article 141

(1) The interest compensation due to the delay in the issuance of the Notice of Tax Overpayment Assessment referred to in Article 138 paragraph (1) subparagraph b is granted at the monthly interest rate determined by the Minister, of the tax overpayment amount.

(2) The number of months as the basis for the granting of the interest compensation referred to in paragraph (1) is calculated from the period of 1 (one) month for the issuance of the Notice of Tax Overpayment Assessment pursuant to the provisions stipulated under Article 17B paragraph (2) of the General Provisions and Tax Procedures Law ends until the issuance of the Notice of Tax Overpayment Assessment.

(3) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(4) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date of the start of the calculation of interest compensation.

Article 142

(1) The interest compensation due to the delay in the issuance of the Notice of Tax Overpayment Assessment referred to in Article 138 paragraph (1) subparagraph c is granted at the monthly interest rate stipulated by the Minister, of the tax overpayment amount.

(2) The number of months as the basis for the granting of interest compensation referred to in paragraph (1) is calculated from the time the period of 12 (twelve) months from the date the application letter for the tax refund is completely received ends until the time the Notice of Tax Overpayment Assessment is issued.

(3) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(4) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date of the start of the calculation of interest compensation.

Article 143

(1) The interest compensation for the tax overpayment due to the filing of an objection, the application for an appeal or the application for a civil review

related to the Tax Return stating an overpayment referred to in Article 138 paragraph (1) subparagraph d is granted at the monthly interest rate determined by the Minister, of the tax overpayment amount.

(2) The number of months as the basis for the granting of interest compensation referred to in paragraph (1) is calculated from the date of issuance of the Notice of Tax Underpayment Assessment, Notice of Additional Tax Underpayment Assessment, Notice of Tax Overpayment Assessment or Notice of Nil Tax Assessment until:
   a. the Objection Decision Letter is issued; and/or
   b. the Appeal Decision or Civil Review Decision is received by the office of the Directorate General of Taxes authorised to implement the decision.

(3) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(4) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date the calculation of interest compensation starts.

Article 144

(1) The interest compensation for the tax overpayment due to the Amendment Decision Letter, the reduction or cancellation of the Notice of Tax Assessment decision letter or reduction or cancellation of the Notice of Tax Collection decision letter, referred to in Article 138 paragraph (1) subparagraph e is granted at the monthly interest rate stipulated by the Minister, of the tax overpayment amount.

(2) The number of months as the basis for the granting of interest compensation referred to in paragraph (1) is calculated from:
   a. the date of payment of the Notice of Tax Underpayment Assessment or Notice of Additional Tax Underpayment Assessment until the date the Amendment Decision Letter or the reduction or cancellation of the Notice of Tax Assessment decision letter is issued;
   b. the date of issuance of the Notice of Tax Overpayment Assessment or Notice of Nil Tax Assessment until the date the Amendment Decision Letter or the reduction or cancellation of the Notice of Tax Assessment decision letter is issued; or
   c. the date of payment of the Notice of Tax Collection until the date the Amendment Decision Letter or reduction or cancellation of the Notice of Tax Collection decision letter is issued.

(3) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(4) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date of the start of the calculation of interest compensation.

Article 145

(1) The interest compensation due to the delay in the Land and Building Tax refund referred to in Article 139 paragraph (1) is granted at the monthly interest rate stipulated by the Minister, of the tax overpayment amount.
(2) The number of months as the basis for the granting of interest compensation referred to in paragraph (1) is calculated from the time the issuance deadline for the Tax Refund Decision Letter ends until the date of issuance of the Tax Refund Decision Letter.
(3) The issuance deadline for the Tax Refund Decision Letter referred to in paragraph (2) is no later than 1 (one) month from the time:
    a. the Notice of Tax Overpayment Assessment is issued;
    b. the Objection Decision Letter is issued;
    c. the Appeal Decision or Civil Review Decision is received by the office of the Directorate General of Taxes authorised to implement the Appeal Decision or Civil Review Decision;
    d. the Land and Building Tax Reduction Decision Letter is issued;
    e. the Land and Building Tax Administrative Fine Reduction Decision Letter is issued;
    f. the Amendment Decision Letter is issued;
    g. the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter is issued;
    h. the Tax Assessment Reduction Decision Letter is issued for the Notice of Tax Due or the Notice of Land and Building Tax Assessment; or
    i. the Tax Assessment Cancellation Decision Letter is issued for the Notice of Tax Due, Notice of Land and Building Tax Assessment or Notice of Land and Building Tax Collection.
(4) The interest compensation referred to in paragraph (1) is granted for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.
(5) The monthly interest rate referred to in paragraph (1) is the applicable interest rate on the date the calculation of interest compensation starts.

Article 146

(1) In the event that there is interest compensation as referred to in Article 138 and Article 139, the Taxpayer applies for the granting of the interest compensation to the Head of the Tax Office where the Taxpayer is registered.
(2) The submission of the application referred to in paragraph (1) is conducted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 147

(1) The Director General of Taxes issues the Interest Compensation Decision Letter if the application for the granting of the interest compensation referred to in Article 146 fulfils the provisions on the granting of interest compensation referred to in Article 138 or Article 139.

(2) The issuance of the Interest Compensation Decision Letter referred to in paragraph (1) related to the granting of interest compensation for tax overpayment due to the filing of an objection, application for an appeal or application for a civil review referred to in Article 138 paragraph (1) subparagraph d, may be conducted if:
   a. against the Objection Decision Letter, no application for an appeal is submitted to the Tax Court;
   b. the Appeal Decision has been received by the office of the Directorate General of Taxes authorised to grant interest compensation; or
   c. the Civil Review Decision has been received by the office of the Directorate General of Taxes authorised to grant interest compensation.

(3) In the event that the Interest Compensation Decision Letter is not issued because the application for the granting of the interest compensation referred to in Article 146 paragraph (1) does not fulfil the provisions referred to in paragraph (1) and paragraph (2), the Director General of Taxes issues the notification that the Interest Compensation Decision Letter is not issued to the Taxpayer.

(4) The Interest Compensation Decision Letter referred to in paragraph (1) or the notification that the Interest Compensation Decision Letter is not issued referred to in paragraph (3) is issued no later than 1 (one) month from the time the application for the granting of the interest compensation is completely received by the Tax Office.

(5) The Interest Compensation Decision Letter referred to in paragraph (1) is issued based on the calculation memo for the granting of interest compensation that contains the calculation of the amount of interest compensation granted to the Taxpayer.

(6) For Taxpayers that have obtained a permit to maintain Bookkeeping in English and United States dollars, the interest compensation related to tax payable in United States dollars is granted in rupiah, calculated using the exchange rate or rate stipulated by the Minister applicable at the time:
   a. the Notice of Tax Overpayment Assessment is issued as stipulated under Article 17B General Provisions and Tax Procedures Law;
   b. the Objection Decision Letter is issued, or the Appeal Decision or Civil Review Decision is pronounced;
   c. the Amendment Decision Letter is issued;
   d. the reduction or cancellation of the Notice of Tax Assessment decision letter is issued; or
   e. the reduction or cancellation of the Notice of Tax Collection decision letter is issued.

Article 148

The payment of interest compensation is part of the reduction in tax revenue.

Article 149

The Director General of Taxes issues the Notice of Tax Collection stipulated under Article 14 paragraph (1) subparagraph h of the General Provisions and

Tax Procedures Law to re-collect interest compensation that should not otherwise be granted to the Taxpayer in the event that a decision is issued, a ruling is received or data or information is found, indicating the existence of interest compensation that should not otherwise be granted to the Taxpayer.

Section Four
Procedures for the Calculation and Tax Refunds

Article 150

A Taxpayer obtains a tax refund in the event that:

a. there is tax overpayment; and
b. interest compensation is granted,

related to Income Tax, Value Added Tax, Sales Tax on Luxury Goods, Land and Building Tax, Stamp Duty, Sales Tax and Carbon Tax pursuant to statutory laws and regulations.

Article 151

The overpayment referred to in Article 150 letter a related to Income Tax, Value Added Tax, Sales Tax on Luxury Goods, Stamp Duty, Sales Tax and Carbon Tax may be refunded in the event of:

a. the overpaid tax listed in the Notice of Tax Overpayment Assessment stipulated under Article 17 paragraph (1) of the General Provisions and Tax Procedures Law;
b. the tax that should not otherwise be payable listed in the Notice of Tax Overpayment Assessment stipulated under Article 17 paragraph (2) of the General Provisions and Tax Procedures Law;
c. the overpaid tax listed in the Notice of Tax Overpayment Assessment stipulated under Article 17B of the General Provisions and Tax Procedures Law;
d. the overpaid tax listed in the Preliminary Tax Refund Decision Letter stipulated under Article 17C of the General Provisions and Tax Procedures Law;
e. the overpaid tax listed in the Preliminary Tax Refund Decision Letter stipulated under Article 17D of the General Provisions and Tax Procedures Law;
f. the tax that has been paid on the purchase of Taxable Goods brought outside the Customs Territory by an individual holding a foreign passport stipulated under Article 17E of the General Provisions and Tax Procedures Law and Article 16E of the Value Added Tax Law;
g. the overpaid tax listed in the Preliminary Tax Refund Decision Letter stipulated under Article 9 paragraph (4c) of the Value Added Tax Law;
h. the overpaid tax due to the issuance of the Objection Decision Letter, Appeal Decision or Civil Review Decision by the Supreme Court;
i. the overpaid tax due to the issuance of the Amendment Decision Letter stipulated under Article 16 of the General Provisions and Tax Procedures Law;

j. the overpaid tax due to the issuance of the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter stipulated under Article 36 paragraph (1) subparagraph a of the General Provisions and Tax Procedures Law;
k. the overpaid tax due to the issuance of the Notice of Tax Assessment Reduction Decision Letter or the Notice of Tax Assessment Cancellation Decision Letter stipulated under Article 36 paragraph (1) subparagraph b of the General Provisions and Tax Procedures Law;
l. the overpaid tax due to the issuance of the Notice of Tax Collection Reduction Decision Letter or Notice of Tax Collection Cancellation Decision Letter stipulated under Article 36 paragraph (1) subparagraph c of the General Provisions and Tax Procedures Law;
m. the overpaid tax due to the issuance of the Notice of Tax Assessment Cancellation Decision Letter stipulated under Article 36 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law; or
n. the overpaid tax due to the issuance of the Mutual Agreement Decision Letter stipulated under Article 27C paragraph (6) of the General Provisions and Tax Procedures Law.

Article 152

The overpayment referred to in Article 150 letter a related to Land and Building Tax may be refunded in the event of:
a. the overpaid Land and Building Tax due to the issuance of the Notice of Tax Overpayment Assessment;
b. the overpaid Land and Building Tax due to the issuance of the Objection Decision Letter;
c. the overpaid Land and Building Tax due to the issuance of the Appeal Decision or Civil Review Decision;
d. the overpaid Land and Building Tax due to the issuance of the Land and Building Tax Reduction Decision Letter stipulated under Article 19 of the Land and Building Tax Law;
e. the overpaid Land and Building Tax due to the issuance of the Land and Building Tax Administrative Fine Reduction Decision Letter stipulated under Article 20 of the Land and Building Tax Law;
f. the overpaid Land and Building Tax due to the issuance of the Amendment Decision Letter stipulated under Article 16 of the General Provisions and Tax Procedures Law;
g. the overpaid Land and Building Tax due to the issuance of the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter stipulated under Article 36 paragraph (1) subparagraph a of the General Provisions and Tax Procedures Law;
h. the overpaid Land and Building Tax due to the issuance of the Tax Assessment Reduction Decision Letter for the Notice of Tax Due or the Notice of Land and Building Tax Assessment stipulated under Article 36 paragraph (1) subparagraph b of the General Provisions and Tax Procedures Law;

i. the overpaid Land and Building Tax due to the issuance of the Tax Assessment Cancellation Decision Letter for the Notice of Tax Due or the Notice of Land and Building Tax Assessment stipulated under Article 36 paragraph (1) subparagraph b of the General Provisions and Tax Procedures Law;
j. the overpaid Land and Building Tax due to the issuance of the Tax Assessment Cancellation Decision Letter for the Notice of Land and Building Tax Collection stipulated under Article 36 paragraph (1) subparagraph c of the General Provisions and Tax Procedures Law; or
k. the overpaid Land and Building Tax due to the issuance of the Tax Assessment Cancellation Decision Letter for the Notice of Land and Building Tax Assessment stipulated under Article 36 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law.

Article 153

The interest compensation referred to in Article 150 letter b is granted in the event that the following are issued:
a. the Interest Compensation Decision Letter; and
b. the Amendment Decision Letter for the Interest Compensation Decision Letter that increases the amount of the interest compensation.

Article 154

(1) The tax overpayment referred to in Article 151 and Article 152 as well as the interest compensation referred to in Article 153 must be set off to first settle the Tax Liabilities of the Taxpayer listed in:
    a. the Notice of Tax Collection, except for the Notice of Tax Collection related to the amount of tax in the Notice of Tax Assessment that is not approved in the Closing Conference and against the Notice of Tax Assessment, an objection and/or appeal is filed until the Objection Decision Letter and/ or Appeal Decision is issued;
    b. the Notice of Tax Underpayment Assessment or Notice of Additional Tax Underpayment Assessment, for the amount approved by the Taxpayer in the Closing Conference;
    c. the Notice of Tax Underpayment Assessment or Notice of Additional Tax Underpayment Assessment, for the amount not approved by the Taxpayer in the Closing Conference, against which:
        1. no objection is filed;
        2. an objection is filed but the Objection Decision Letter partially grants, rejects or increases the amount of tax payable and against the Objection Decision Letter, no appeal is filed; or
        3. an objection is filed and against the Objection Decision Letter, an appeal is filed but the Appeal Decision grants in part, rejects or increases the amount of tax payable;
    d. the Notice of Tax Due;
    e. the Notice of Land and Building Tax Assessment;
    f. the Notice of Land and Building Tax Collection;

g. the Objection Decision Letter resulting in the increase in the amount of outstanding tax, but no appeal is filed;
h. the Amendment Decision Letter resulting in the increase in the amount of outstanding tax;
i. the Mutual Agreement Decision Letter resulting in the increase in the amount of outstanding tax; and/or
j. the Appeal Decision or Civil Review Decision resulting in the increase in the amount of outstanding tax.

(2) If after the calculation referred to in paragraph (1) is conducted, there is a remaining tax overpayment, the remaining tax overpayment is refunded to the Taxpayer or may be used to:
a. pay Tax Liabilities on behalf of another Taxpayer; and/or
b. top-up the Tax Deposit in the name of the Taxpayer,
based on the Taxpayer's approval.

(3) The Taxpayer's approval referred to in paragraph (2) is conducted in the event that the Directorate General of Taxes sends a request for confirmation of tax overpayment set-off against the Tax Liabilities of another Taxpayer and/or Tax Deposit.

(4) The Taxpayer's approval referred to in paragraph (3) is submitted within a maximum period of:
a. 7 (seven) days from the time the request for confirmation is submitted; or
b. 1 (one) day before the issuance due date for the Tax Refund Decision Letter,
depending on whichever event occurs first.

(5) In the event that the Taxpayer does not submit approval of the confirmation within the period referred to in paragraph (4), the remaining tax overpayment is refunded to the Taxpayer.

Article 155

(1) The tax refund is conducted using a domestic account number in the name of the Taxpayer available in the Taxpayer's profile in the tax database.

(2) In the event that the domestic account number in the name of the Taxpayer is not yet available in the Taxpayer's profile referred to in paragraph (1), the Director General of Taxes may request the Taxpayer to update the account number in the Taxpayer's profile in the tax database.

(3) Excluded from the user of the domestic account in the name of the Taxpayer referred to in paragraph (1), in the event of:
a. the Value Added Tax refund referred to in Article 151 letter f, a foreign account in the name of a Foreign Tourist may be used;
b. the refund to a foreign mission/international body or its officials, a foreign account in the name of the foreign mission/international body or its officials may be used;
c. the refund to a non-tax resident wherein the withholding or collection agent cannot be found or the refund may be self-applied for by a non-tax resident, a foreign account in the name of the non-tax

resident concerned or a domestic account of an individual or Entity appointed by the non-tax resident may be used;

d. the refund to a Taxpayer conducting a merger or consolidation, a domestic account in the name of the entity receiving the merger or the new entity resulting from the consolidation may be used;
e. the refund to a tax bearer for the payment of the Tax Liabilities of a Taxpayer that should not be otherwise paid, a domestic account in the name of the tax bearer may be used;
f. the refund to a Taxpayer declared bankrupt, a domestic account in the name of the curator may be used;
g. the refund to a Taxpayer in dissolution, a domestic account in the name of the person or Entity assigned to conduct the settlement may be used;
h. the refund to a liquidated Taxpayer, a domestic account in the name of the liquidator may be used;
i. the refund to an undivided inheritance Taxpayer, a domestic account in the name of one of the heirs/heiresses, executor of the will or the trustee may be used; and
j. other refunds determined by the Director General of Taxes.

Article 156

(1) The calculation of the tax refund and/or the granting of interest compensation with Tax Liabilities and/or tax that will be payable or the Tax Deposit referred to in Article 154 paragraph (2) shall be outlined in the calculation memo for the tax overpayment.
(2) In the event that the tax overpayment referred to in Article 151 uses United States dollars, the refund of the tax payment is granted in rupiah calculated using the exchange rate or rate stipulated by the Minister applicable at the time:
    a. the Notice of Tax Overpayment Assessment referred to in Article 151 letter a, letter b and letter c is issued;
    b. the Preliminary Tax Refund Decision Letter referred to in Article 151 letter d and letter e is issued;
    c. the Objection Decision Letter referred to in Article 151 letter h is issued;
    d. the Appeal Decision or Civil Review Decision referred to in Article 151 letter h is received by the office of the Directorate General of Taxes authorised to implement the Appeal Decision or Civil Review Decision; or
    e. the decision letter referred to in Article 151 letter i, letter j, letter k, letter l, letter m and letter n is issued.

Article 157

(1) The Head of the Tax Office issues a Tax Refund Decision Letter based on the calculation memo referred to in Article 156 paragraph (1).
(2) The Tax Refund Decision Letter referred to in paragraph (1) is:

a. the Tax Refund Decision Letter with an account number, in the event that there is an account number in the Taxpayer's profile in the tax database; or
b. the Tax Refund Decision Letter without an account number, in the event that there is no account number in the Taxpayer's profile in the tax database.

(3) The date of issuance of the Tax Refund Decision Letter referred to in paragraph (1) is recognised as the date of:
a. the settlement of the Tax Liabilities of the Taxpayer referred to in Article 154 paragraph (1); and
b. the settlement of Tax Liabilities on behalf of another Taxpayer and/or top-up of the Tax Deposit referred to in Article 154 paragraph (2).

(4) The Tax Refund Decision Letter referred to in paragraph (1) for the overpayment of Income Tax, Value Added Tax, Sales Tax on Luxury Goods, Stamp Duty, Sales Tax and/or Carbon Tax is issued no later than 1 (one) month from the time:
a. the application for the refund of tax overpayment related to the issuance of the Notice of Tax Overpayment Assessment referred to in Article 151 letter a is received;
b. the Notice of Tax Overpayment Assessment referred to in Article 151 letter b or letter c is issued;
c. the Preliminary Tax Refund Decision Letter referred to in Article 151 letter d, letter e or letter g is issued;
d. the Objection Decision Letter referred to in Article 151 letter h is issued;
e. the Appeal Decision or Civil Review Decision referred to in Article 151 letter h is received by the office of the Directorate General of Taxes authorised to implement the Appeal Decision or Civil Review Decision;
f. the Amendment Decision Letter referred to in Article 151 letter i is issued;
g. the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter referred to in Article 151 letter j is issued;
h. the Notice of Tax Assessment Reduction Decision Letter or the Notice of Tax Assessment Cancellation Decision Letter referred to in Article 151 letter k is issued;
i. the Notice of Tax Collection Reduction Decision Letter or Notice of Tax Collection Cancellation Decision Letter referred to in Article 151 letter l is issued;
j. the Notice of Tax Assessment Cancellation Decision Letter referred to in Article 151 letter m is issued; or
k. the Mutual Agreement Decision Letter referred to in Article 151 letter n is issued.

(5) The Tax Refund Decision Letter referred to in paragraph (1) for the overpayment of Land and Building Tax is issued no later than 1 (one) month from the time:

a. the Notice of Tax Overpayment Assessment referred to in Article 152 letter a is issued;
b. the Objection Decision Letter referred to in Article 152 letter b is issued;
c. the Appeal Decision or Civil Review Decision referred to in Article 152 letter c is received by the office of the Directorate General of Taxes authorised to implement the Appeal Decision or Civil Review Decision;
d. the Land and Building Tax Reduction Decision Letter referred to in Article 152 letter d is issued;
e. the Land and Building Tax Administrative Fine Reduction Decision Letter referred to in Article 152 letter e is issued;
f. the Amendment Decision Letter referred to in Article 152 letter f is issued;
g. the Administrative Penalty Reduction Decision Letter or Administrative Penalty Nullification Decision Letter referred to in Article 152 letter g is issued;
h. the Tax Assessment Reduction Decision Letter for the Notice of Tax Due or the Notice of Land and Building Tax Assessment referred to in Article 152 letter h is issued; or
i. the Tax Assessment Cancellation Decision Letter for the Notice of Tax Due or the Notice of Land and Building Tax Assessment referred to in Article 152 letter i is issued;
j. the Tax Assessment Cancellation Decision Letter for the Notice of Land and Building Tax Collection referred to in Article 152 letter j is issued; or
k. the Tax Assessment Cancellation Decision Letter for the Notice of Land and Building Tax Assessment referred to in Article 152 letter k is issued.

(6) The Tax Refund Decision Letter referred to in paragraph (1) for the granting of interest compensation is issued no later than 1 (one) month starting from the time the following are issued:
a. the Interest Compensation Decision Letter; or
b. the Amendment Decision Letter for the Interest Compensation Decision Letter that increases the amount of the interest compensation.

Article 158

(1) Based on the Tax Refund Decision Letter referred to in Article 157 paragraph (1), the Head of the Tax Office on behalf of the Minister:
a. issues the Disbursement of Refund Claim or Payment Order for Interest Compensation, in the event that the Tax Refund Decision Letter is issued with an account number; or
b. does not issue the Disbursement of Refund Claim or Payment Order for Interest Compensation, in the event that The Tax Refund Decision Letter is issued without an account number.

(2) In the event that the Disbursement of Refund Claim or Payment Order for Interest Compensation referred to in paragraph (1) subparagraph b is not issued, the Head of the Tax Office:
   a. notifies the Taxpayer that the Disbursement of Refund Claim or Payment Order for Interest Compensation is not issued; and
   b. requests the Taxpayer to update the account number in the Taxpayer's profile in the tax database.

(3) In the event that the Taxpayer has updated the account number referred to in paragraph (2) subparagraph b, the Head of the Tax Office:
   a. completes the Tax Refund Decision Letter with the account number notified by the Taxpayer; and
   b. issues the Disbursement of Refund Claim or Payment Order for Interest Compensation.

(4) In the event of errors in the issuance of the Disbursement of Refund Claim or Payment Order for Interest Compensation referred to in paragraph (1) and paragraph (3), the Head of the Tax Office on behalf of the Minister amends the Disbursement of Refund Claim or Payment Order for Interest Compensation insofar as the Fund Disbursement Order has not been issued.

(5) The Disbursement of Refund Claim and Payment Order for Interest Compensation referred to in paragraph (1) are issued no later than 1 (one) month from the time:
   a. the Tax Refund Decision Letter is issued, in the event that the Tax Refund Decision Letter is issued with an account number; or
   b. the Taxpayer submits the account number, in the event that the Tax Refund Decision Letter is issued without an account number.

Article 159

(1) The calculation of the tax overpayment or granting of interest compensation for the:
   a. settlement of the Tax Liabilities of the Taxpayer referred to in Article 154 paragraph (1); and/or
   b. settlement of Tax Liabilities on behalf of another Taxpayer and/or top-up of the Tax Deposit referred to in Article 154 paragraph (2),

   is followed up with the set-off against Tax Liabilities and/or Tax Deposit.

(2) The set-off of the tax overpayment or the granting of interest compensation to the Tax Deposit referred to in paragraph (1) subparagraph b is conducted based on the Taxpayer's approval.

(3) In the event that no set-off is conducted against Tax Liabilities and/or Tax Deposit:
   a. all tax overpayments are refunded to the Taxpayer concerned; or
   b. all interest compensation is granted to the Taxpayer concerned.

(4) The set-off against Tax Liabilities and/or Tax Deposit referred to in paragraph (1) is conducted through the Disbursement of Refund Claim and Payment Order for Interest Compensation deduction.

(5) The Disbursement of Refund Claim and Payment Order for Interest Compensation deduction shall be deemed valid in the event that a Fund

Disbursement Order number has been obtained pursuant to the provisions stipulated under statutory laws and regulations in the field of treasury.

(6) The Disbursement of Refund Claim and Payment Order for Interest Compensation are charged to the tax revenue account for the current fiscal year, namely to the same account as the account at the time the initial tax revenues are recognised.

(7) The Disbursement of Refund Claim, Payment Order for Interest Compensation, Tax Refund Decision Letter and Computer Data Archives are submitted to the State Treasury Office electronically or in person by the appointed officers.

(8) Based on the Disbursement of Refund Claim and Payment Order for Interest Compensation referred to in paragraph (7), the Head of the State Treasury Office on behalf of the Minister issues the Fund Disbursement Order.

Article 160

(1) Officials authorised to sign the Tax Refund Decision Letter, Disbursement of Refund Claim and Payment Order for Interest Compensation submit signature specimens to the Head of the State Treasury Office at the beginning of each fiscal year.

(2) In the event of changes in the officials authorised to sign the Tax Refund Decision Letter, Disbursement of Refund Claim and Payment Order for Interest Compensation, the replacement officials must submit the signature specimens to the Head of the State Treasury Office from the time the persons concerned take office.

CHAPTER VI
PROCEDURES FOR THE FILING AND PROCESSING OF TAX RETURNS

Section One
Tax Returns

Article 161

(1) Every Taxpayer is required to fill out the Tax Return correctly, completely and clearly, in the Indonesian language using Latin alphabet, Arabic numerals, rupiah and sign as well as submit it to the office of the Directorate General of Taxes where the Taxpayer is registered or subject to VAT registration or other places determined by the Director General of Taxes.

(2) Corporate Taxpayers permitted to maintain Bookkeeping using English and United States dollars, are required to file the Corporate Income Tax Return as well as its attachments in the Indonesian language except for the attachments in the form of financial statements and using United States dollars.

(3) Taxpayers appointed as Other Parties residing or domiciled outside the Customs Territory and choose to implement their payment and filing

obligations for Electronic Commerce Value Added Tax using United States dollars, are required to complete Periodic Value Added Tax Returns using United States dollars.

Article 162

(1) Tax Returns include:
   a. Periodic Tax Returns, which consist of:
      1. Periodic Income Tax Returns:
         a) Periodic Article 21 and/or Article 26 Income Tax Returns;
         b) Unified Periodic Income Tax Returns;
         c) disclosure of net assets Periodic final Income Tax Returns;
         d) Periodic final Income Tax Returns in the context of the voluntary disclosure program; and
         e) the report on state revenues from upstream oil and/or natural gas business activities;
      2. Periodic Value Added Tax Returns:
         a) Periodic Value Added Tax Returns for Taxable Persons;
         b) Periodic Value Added Tax Returns for Taxable Persons using the calculation guidelines for Input VAT crediting;
         c) Periodic Value Added Tax Returns for Value Added Tax Collection Agents and Other Parties, not constituting Taxable Persons; and
         d) Periodic Value Added Tax Returns for Electronic Commerce Value Added Tax Collection Agents;
      3. Periodic Stamp Duty Tax Returns; and
      4. Periodic Carbon Tax Returns.
   b. Annual Tax Returns, which consist of:
      1. the Annual Income Tax Return for the Tax Year;
      2. the Annual Income Tax Return for a Fraction of a Tax Year; and
      3. the Annual Carbon Tax Return;

      and
   c. the Notice of Taxable Objects.

(2) The Tax Returns referred to in paragraph (1) are in the form of:
   a. Electronic Documents; or
   b. paper forms (hardcopy).

(3) To the mention of the Fraction of a Tax Year in the Annual Income Tax Return for the Fraction of a Tax Year referred to in paragraph (1) subparagraph b number 2, the following provisions shall apply:
   a. using the calendar year, in the event that the Fraction of a Tax Year includes 1 (one) calendar year;
   b. using the calendar year that contains a greater number of months, in the event that the Fraction of a Tax Year includes 2 (two) different calendar years; or
   c. using the first calendar year, in the event that the Fraction of a Tax Year covers 2 (two) calendar years with the same number of months in each calendar year.

Article 163

(1) Periodic Article 21 and/or Article 26 Income Tax Returns must be filed by the withholding agent in the form of Electronic Documents.
(2) Unified Periodic Income Tax Returns must be filed by Taxpayers conducting withholding, collection, self-payment and/or self-remittance, in the form of Electronic Documents.
(3) The disclosure of net asset Periodic final Income Tax Returns must be filed by Taxpayers in the form of Electronic Documents.
(4) The Periodic final Income Tax Returns in the context of the voluntary disclosure program must be filed by Taxpayers participating in the voluntary disclosure program that do not fulfil the provisions on the realisation of the transfer of net assets and/or investments in the form of Electronic Documents.
(5) The reports on state revenues from upstream oil and/or natural gas business activities must be filed by Taxpayers in the form of Electronic Documents.
(6) Periodic Value Added Tax Returns for Taxable Persons must be filed by each Taxable Person in the form of Electronic Documents.
(7) Periodic Value Added Tax Returns for Taxable Persons using the calculation guidelines for Input VAT crediting must be filed by, among others:
    a. Taxable Persons stipulated under Article 9 paragraph (9a) of the Value Added Tax Law; and
    b. Taxable Persons stipulated under the Ministerial Regulation concerning calculation guidelines for Input VAT crediting for Taxable Persons whose business turnover does not exceed a certain amount,

    in the form of Electronic Documents.
(8) Periodic Value Added Tax Returns for Value Added Tax Collection Agents and Other Parties not constituting Taxable Persons must be filed in the form of Electronic Documents by:
    a. Value Added Tax Collection Agents; and
    b. Other Parties residing or domiciled within the Customs Territory,

    not constituting Taxable Persons.
(9) Periodic Value Added Tax Returns for Electronic Commerce Value Added Tax Collection Agents must be filed by Other Parties residing or domiciled outside the Customs Territory, in the form of Electronic Documents.
(10) Periodic Stamp Duty Tax Returns must be filed by each Stamp Duty collection agent in the form of Electronic Documents.
(11) Periodic Carbon Tax Returns must be filed by each Carbon Tax collection agent in the form of Electronic Documents.
(12) The Annual Income Tax Return must be filed by Taxpayers in the form of Electronic Documents, insofar as the Taxpayers fulfil the following criteria:
    a. constituting Corporate Taxpayers;
    b. the filed Annual Income Tax Return is of overpayment status;
    c. required to file Periodic Tax Returns in the form of Electronic Documents;

d. having filed Annual Tax Returns in the form of Electronic Documents;
e. registered at a Tax Office other than the Small Taxpayer Office;
f. using tax consultant services in the fulfilment of the obligation to complete the Annual Income Tax Return; and/or
g. their financial statements are audited by public accountants.

(13) The Annual Carbon Tax Return must be filed by each Taxpayer in the form of Electronic Documents.

(14) The Director General of Taxes may determine certain Taxpayers other than the Taxpayers referred to in paragraph (1) to paragraph (13) to file Tax Returns in the form of Electronic Documents or in the form of paper forms (hardcopy).

(15) For Taxpayers required to file Tax Returns in the form of Electronic Documents, but the Taxpayers concerned continue to file Tax Returns in the form of paper forms (hardcopy), the Directorate General of Taxes does not provide proof of receipt of the Tax Returns.

(16) The Taxpayers referred to in paragraph (15) are deemed not to file Tax Returns.

(17) Taxpayers that do not fulfil the criteria to file Tax Returns in the form of Electronic Documents referred to in paragraph (1) to paragraph (13) may file Tax Returns in the form of paper forms (hardcopy) referred to in Article 162 paragraph (2) subparagraph b.

Article 164

(1) A Tax Return at the minimum contains:
a. the type of tax;
b. the name of the Taxpayer and Taxpayer Identification Number;
c. the Taxable Period, Fraction of a Tax Year or the Tax Year concerned; and
d. the signature of the Taxpayer or Taxpayer's attorney.

(2) The Annual Income Tax Return, in addition to containing the data referred to in paragraph (1), contains data on:
a. the amount of business turnover;
b. the amount of income, including income not constituting a taxable object;
c. the amount of taxable income;
d. the amount of tax payable;
e. the amount of tax credit;
f. the amount of tax underpayment or overpayment;
g. amount of assets and liabilities; and
h. other data related to the Taxpayer's business activities.

(3) Periodic Income Tax Returns, in addition to containing the data referred to in paragraph (1), contain data on:
a. the amount of the tax base;
b. the amount of tax payable and/or amount of tax paid; and
c. other data related to the Taxpayer's business activities.

(4) Periodic Value Added Tax Returns for Taxable Persons, in addition to containing the data referred to in paragraph (1), contain data on:

a. the amount of supplies;
b. the amount of acquisitions;
c. the amount of the tax base;
d. the amount of Output VAT;
e. the amount of creditable Input VAT;
f. the amount of tax underpayment or overpayment;
g. other data related to Value Added Tax and/or Sales Tax on Luxury Goods collection activities by Value Added Tax Collection Agents and Other Parties residing or domiciled within the Customs Territory; and
h. other data related to the Taxable Person's business activities.

(5) Periodic Value Added Tax Returns for Taxable Persons that use the calculation guidelines for Input VAT crediting, in addition to containing the data referred to in paragraph (1), contain data on:
a. the amount of supplies;
b. the amount of acquisitions;
c. the amount of the tax base;
d. the amount of Output VAT;
e. the amount of creditable Input VAT;
f. the amount of tax underpayment or overpayment; and
g. other data related to the Taxable Person's business activities.

(6) Periodic Value Added Tax Returns for Value Added Tax Collection Agents and Other Parties, not constituting Taxable Persons, in addition to containing the data referred to in paragraph (1), contain data on:
a. the amount of the tax base;
b. the amount of collected tax;
c. the amount of remitted tax;
d. the date of collection; and
e. other data related to Value Added Tax and/or Sales Tax on Luxury Goods collection activities by Value Added Tax Collection Agents and Other Parties residing or domiciled within the Customs Territory.

(7) The disclosure of net assets Periodic final Income Tax Return, in addition to containing the data referred to in paragraph (1) and paragraph (3), contains data on:
a. the list of asset details;
b. list of debt details; and
c. the calculation of Income Tax final payable.

(8) Periodic final Income Tax Returns in the context of the voluntary disclosure program, in addition to containing the data referred to in paragraph (1) and paragraph (3), contain data on:
a. the list of details of net assets that are not transferred and/or invested; and
b. the calculation of the additional Income Tax final payable.

(9) The report on state revenues from upstream oil and/or natural gas business activities, in addition to containing the data referred to in paragraph (1) and paragraph (3), contains data on:
a. Lifting of oil and/or gas;

b. equity to be split; and
c. the state's share.

(10) Periodic Value Added Tax Returns for Electronic Commerce Value Added Tax Collection Agents, in addition to containing the data referred to in paragraph (1), contain data on:
a. the number of Goods Beneficiaries and/or Service Beneficiaries;
b. the amount of the transaction payments, excluding collected Value Added Tax;
c. the amount of collected Value Added Tax; and
d. details of collected Value Added Tax transactions.

(11) Periodic Stamp Duty Tax Returns, in addition to containing the data referred to in paragraph (1), contain data on:
a. the number of documents and collected Stamp Duty as well as the number of documents and exempt Stamp Duty, based on the Stamp Duty object;
b. the number of documents and collected Stamp Duty based on the collection method;
c. the amount of Stamp Duty remittance; and
d. other data related to Stamp Duty collection.

(12) The Notice of Taxable Objects, in addition to containing the data referred to in paragraph (1), contains data on:
a. the Taxable Object Number;
b. the sector;
c. the type/subsector;
d. the Taxable Object location data;
e. the Taxpayer data;
f. the land area and building area data;
g. the income data; and
h. other data related to Taxable Object concession activities.

(13) The Annual Carbon Tax Return, in addition to containing the data referred to in paragraph (1), contains data on:
a. the calculation of Carbon Tax payable;
b. the calculation of Carbon Tax reduction; and
c. Carbon Tax to be paid.

(14) Periodic Carbon Tax Returns, in addition to containing the data referred to in paragraph (1), contain data on:
a. the sales value of carbon-containing products;
b. the Carbon Tax base; and
c. the collected and remitted Carbon Tax.

Article 165

(1) A Tax Return consists of the master Tax Return and attachments which constitute an integral unit.

(2) The Tax Return referred to in paragraph (1) must be attached with details and/or documents pursuant to statutory provisions in the field of taxation.

(3) The Annual Income Tax Return for Taxpayers required to maintain Bookkeeping must be attached with financial statements in the form of

balance sheet and income statement as well as other details required to calculate the amount of taxable income.

(4) In the event that the financial statements referred to in paragraph (3) are audited by a public accountant, the Taxpayers must attach the audited financial statements.

(5) In the event that the Annual Income Tax Return is filed electronically, the financial statements referred to in paragraph (3) are filed in the electronic format as per the format and means determined or provided by the Director General of Taxes.

(6) The financial statements referred to in paragraph (3) are the financial statements of each Taxpayer.

(7) In the event that a Taxpayer is a parent company, in addition to filing the financial statements referred to in paragraph (6), the Taxpayer must also attach the consolidated financial statements.

Article 166

(1) Tax Returns in the form of paper forms (hardcopy) may be fetched in person at the Tax Office or other places determined by the Director General of Taxes.

(2) Tax Returns in the form of Electronic Documents may be accessed or downloaded by Taxpayers through:
   a. the Taxpayer Portal; or
   b. other webpages or applications integrated with the administration system of the Directorate General of Taxes.

Article 167

(1) The filed Tax Returns must be signed by the Taxpayer or the Taxpayer's attorney.

(2) In the event that the Tax Return is signed by the Taxpayer's attorney, the Tax Return must be attached with a special power of attorney pursuant to statutory provisions in the field of taxation.

(3) The signing of the Tax Return is conducted using:
   a. a regular signature; or
   b. an Electronic Signature.

(4) The signatures referred to in paragraph (3) subparagraph a and subparagraph b have the same legal force.

Article 168

(1) The filing of Tax Returns by a Taxpayer may be conducted:
   a. electronically through the Taxpayer Portal or other applications integrated with the administration system of the Directorate General of Taxes;
   b. in person to the Tax Office, Tax Services, Dissemination and Consultation Office or other places determined by the Director General of Taxes; or

c. by post or forwarding company or courier services with proof of postage to the Tax Office where the Taxpayer is registered and other places determined by the Director General of Taxes.

(2) For the filing of the Tax Return referred to in paragraph (1), proof of receipt is provided.

(3) Taxpayers required to file Tax Returns in the form of Electronic Documents referred to in Article 163 are required to file Tax Returns electronically as referred to in paragraph (1) subparagraph a.

(4) For Taxpayers required to file Tax Returns electronically referred to in paragraph (3), but the Taxpayers concerned continue to file Tax Returns other than electronically, the Directorate General of Taxes does not provide the proof of receipt for the Tax Returns.

(5) The Taxpayers referred to in paragraph (4) are deemed not to file a Tax Return.

Article 169

(1) Individual Taxpayers are required to file the Annual Individual Income Tax Return no later than 3 (three) months after the end of the Tax Year.

(2) Corporate Taxpayers are required to file the Annual Income Tax Return no later than 4 (four) months after the end of the Tax Year.

(3) Carbon Tax Taxpayers are required to file the Annual Carbon Tax Return no later than 4 (four) months after the end of the calendar year.

Article 170

(1) Individual Taxpayers required to file an Annual Income Tax Return for a Fraction of a Tax Year are required to file the Tax Return no later than 3 (three) months after the end of the Fraction of a Tax Year.

(2) Corporate Taxpayers required to file the Annual Income Tax Return for a Fraction of a Tax Year, are required to file the Tax Return no later than 4 (four) months after the end of the Fraction of a Tax Year.

Article 171

(1) Taxpayers that self-pay tax or are appointed as Income Tax withholding or collection agents are required to file:
   a. Article 4 paragraph (2) Withholding Tax that is collected, self-paid and/or self-remitted;
   b. Article 15 Withholding Tax, that is self-paid and/or self-remitted;
   c. Article 21 Withholding Tax;
   d. Article 22 Income Tax that is self-collected and/or self-remitted;
   e. Article 23 Withholding Tax;
   f. Article 25 Income Tax that is self-paid; and/or
   g. Article 26 Withholding Tax and/or collection,

   no later than 20 (twenty) days after the Taxable Period ends.

(2) The filing obligation referred to in paragraph (1) is fulfilled by filing:
   a. Periodic Article 21 and/or Article 26 Income Tax Returns to file Article 21 Withholding Tax and/or Article 26 Withholding Tax in

connection with employment, services or activities of individuals; and

b. Unified Periodic Income Tax Returns to file Article 4 paragraph (2) Withholding Tax, that is collected, self-paid and/or self-remitted, Article 15 Withholding Tax, Article 15 Income Tax that is self-paid and/or self-remitted, Article 22 Income Tax that is self-collected and/or self-remitted, Article 23 Withholding Tax, Article 26 Withholding Tax and/or Article 26 Income Tax that is collected not related to employment, services or activities of individuals.

(3) Taxpayers that have self-remitted Article 4 paragraph (2) Income Tax and have received validation for the payment of tax on:

a. income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto; and

b. income from the transfer of Real Estate in certain Collective Investment Contract schemes,

are deemed to have fulfilled the filing obligation referred to in paragraph (1) according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(4) Taxpayers that have self-remitted Article 4 paragraph (2) Income Tax on business income received or accrued by Taxpayers with a certain gross turnover and have received validation of the tax payment, are deemed to have fulfilled the filing obligation referred to in paragraph (1) according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(5) The provisions on the obligation to file Income Tax by filing Periodic Article 21 and/or Article 26 Income Tax Returns referred to in paragraph (2) subparagraph a shall apply:

a. insofar as there is payment of income in connection with employment, services or activities of individuals, for a Taxable Period other than the last Taxable Period; and

b. for the last Taxable Period.

(6) The last taxable period referred to in paragraph (5) is the December period, a certain Taxable Period in which a permanent employee stops working or a certain Taxable Period in which a pensioner stops receiving pension-related money.

(7) The pensioners referred to in paragraph (6) are individuals or their heirs/heiresses, including widows, widowers, children and/or other heirs/heiresses, who receive or accrue remunerations periodically in the form of pension money, pension benefits, old age benefits, old age security, for employment performed in the past.

(8) The provisions on the obligation to file Income Tax by filing Unified Periodic Income Tax Returns referred to in paragraph (2) subparagraph b shall not apply in the event that there are transactions for which the following are mandatory:

a. the issuance of the withholding receipt or collection receipt; and

b. self-remittance,

for the Income Tax referred to in paragraph (2) subparagraph b, in the Taxable Period concerned.

(9) The provisions on the obligation to file the collected Article 22 Income Tax referred to in paragraph (1) subparagraph d shall not apply to the Article 22 Income Tax collection on imports of goods or exports of coal mining commodities, metallic minerals and non-metallic minerals, by a Foreign Exchange Bank and the Directorate General of Customs and Excise.

(10) Taxpayers that have paid Article 25 Income Tax and have received validation of the tax payment are deemed to have fulfilled the filing obligation referred to in paragraph (1) according to the date of payment stated in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(11) The provisions on the obligation to file self-paid Article 25 Income Tax referred to in paragraph (1) shall not apply to Taxpayers with nil Article 25 Income Tax Instalments.

(12) The provisions on the obligation to file the report on state revenues from upstream oil and/or natural gas business activities shall not apply to Taxpayers with an amount of outstanding tax of nil.

(13) Taxable Persons are required to file Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable in one Taxable Period, Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory and Value Added Tax on self-building activities using:

a. Periodic Value Added Tax Returns for Taxable Persons; or
b. Periodic Value Added Tax Returns for Taxable Persons using the calculation guidelines for Input VAT crediting,

no later than the end of the following month after the Taxable Period ends.

(14) Value Added Tax Collection Agents and Other Parties residing or domiciled within the Customs Territory are required to file Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected no later than the end of the following month after the Taxable Period ends using:

a. Periodic Value Added Tax Returns for Taxable Persons for Value Added Tax Collection Agents and Other Parties, constituting Taxable Persons; or
b. Periodic Value Added Tax Returns for Value Added Tax Collection Agents and Other Parties not constituting Taxable Persons for:
   1. Value Added Tax Collection Agents; and
   2. Other Parties residing or domiciled within the Customs Territory, not constituting Taxable Persons.

(15) In the event that in a Taxable Period, there are no transactions that must be subject to Value Added Tax and/or Sales Tax on Luxury Goods collection, the:

a. Value Added Tax Collection Agents; and
b. Other Parties residing or domiciled within the Customs Territory,

not constituting Taxable Persons referred to in paragraph (14) subparagraph b are excluded from the obligation to file Periodic Value

Added Tax Returns for Value Added Tax Collection Agents and Other Parties not constituting Taxable Persons.

(16) Other Parties residing or domiciled outside the Customs Territory, are required to file Value Added Tax that has been collected no later than the end of the following month after the Taxable Period ends using Periodic Value Added Tax Returns for Electronic Commerce Value Added Tax Collection Agents.

(17) The filing obligation referred to in paragraph (13), paragraph (14) subparagraph a and paragraph (16) remains in force in the event that there is no collection and remittance of Value Added Tax in a Taxable Period.

(18) Stamp Duty collecting agents are required to file the Stamp Duty that has been collected using Periodic Stamp Duty Tax Returns no later than 15 (fifteen) days after the Taxable Period ends.

(19) Carbon Tax collection agents are required to file Carbon Tax that has been collected using Periodic Carbon Tax Returns no later than 20 (twenty) days after the Taxable Period ends.

Article 172

(1) Individuals or Entities, not constituting Taxable Persons, are required to file Value Added Tax payable on self-building activities no later than the end of the following month after the Taxable Period ends.

(2) Individuals or Entities, not constituting Taxable Persons, that pay Value Added Tax payable on self-building activities and have obtained validation of the tax payment, are deemed to have fulfilled the filing obligation referred to in paragraph (1) according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(3) Individuals or Entities, not constituting Taxable Persons, are required to file Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory that has been remitted, no later than the end of the following month after the time of supply.

(4) Individuals or Entities, not constituting Taxable Persons, that pay Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory and have obtained validation of the tax payment, are deemed to have fulfilled the filing obligation referred to in paragraph (3) according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

Article 173

(1) In the event that the filing deadline referred to in Article 171 and Article 172 falls on a holiday, the filing may be conducted no later than the following business day.

(2) The holidays referred to in paragraph (1) are Saturdays, Sundays, national holidays, days off for the organisation of general elections or days determined as national collective leave.

Article 174

(1) Taxpayers may extend the filing period for:
   a. the Annual Income Tax Return; and
   b. the Annual Carbon Tax Return,

   referred to in Article 169 for a maximum of 2 (two) months from the filing deadline for the Annual Tax Return by submitting a notification of the extension of the Annual Tax Return.
(2) The notification of the extension of the Annual Income Tax Return referred to in paragraph (1) subparagraph a is submitted in the form of Electronic Documents or in the form of paper forms (hardcopy).
(3) The notification of the extension of the Annual Carbon Tax Return referred to in paragraph (1) subparagraph b is submitted in the form of Electronic Documents.

Article 175

(1) The notification of the extension of the Annual Income Tax Return referred to in Article 174 paragraph (1) subparagraph a is submitted to the Director General of Taxes before the filing deadline for the Annual Income Tax Return expires, attached with:
   a. the temporary calculation of tax payable in 1 (one) Tax Year for which the filing deadline is extended;
   b. the temporary calculation of Article 26 paragraph (4) Income Tax for permanent establishment Taxpayers;
   c. interim financial statements;
   d. the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip as proof of settlement of the underpayment of tax payable, in the event of a tax underpayment; and
   e. a statement letter from a public accountant stating that the audit of the financial statements has not been completed, in the event that the financial statements are audited by a public accountant.
(2) The notification of the extension of the Annual Carbon Tax Return referred to in Article 174 paragraph (1) subparagraph b is submitted to the Director General of Taxes before the filing deadline of the Annual Carbon Tax Return expires, attached with:
   a. the temporary calculation of tax payable in 1 (one) Tax Year for which the filing deadline has been extended;
   b. the interim carbon emission report;
   c. the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip as proof of settlement of the underpayment of tax payable, in the event of a tax overpayment; and
   d. a statement letter from an independent verifier stating that the carbon emission report verification process has not been completed.

(3) The notification of the extension of the Annual Tax Return must be signed by the Taxpayer or the Taxpayer's attorney.
(4) In the event that the notification of the extension of the Annual Tax Return is signed by the Taxpayer's attorney, the notification of the extension of the Annual Tax Return must be attached with a special power of attorney pursuant to statutory laws and regulations in the field of taxation.
(5) In the event that the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip has been validated in the Directorate General of Taxes system, the notification of the extension of the Tax Return does not need to be attached with the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

Article 176

The notification of the extension of the Annual Tax Return referred to in Article 174 paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Article 177

(1) The notification of the extension of the Annual Tax Return that does not fulfil the provisions referred to in Article 175 and Article 176 is deemed not to constitute the notification of the extension of the Annual Tax Return referred to in Article 174 paragraph (1).
(2) If the notification of extension of the Annual Tax Return is deemed not to constitute the notification of the extension of the Annual Tax Return referred to in paragraph (1), the Director General of Taxes will notify the Taxpayer in writing.

Article 178

(1) Taxpayers notifying the extension of the filing of the Annual Tax Return are required to file the Annual Tax Return within the extension deadline stated in the notification.
(2) In the event that the Annual Tax Return referred to in paragraph (1) indicates an Income Tax underpayment value lower than the value of the tax that has been remitted in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in Article 175 paragraph (1), for the overpayment:
    a. an application for Overbooking may be submitted; or
    b. a refund may be requested through the application for the refund of tax overpayment that should not otherwise be payable.

Article 179

(1) If the Tax Return is not filed within the filing period or the extension deadline of the filing of the Tax Return, the Taxpayer is subject to an administrative penalty in the form of a fine pursuant to the provisions under Article 7 paragraph (1) of the General Provisions and Tax Procedures Law.

(2) Excluded from the imposition of the administrative penalty in the form of a fine referred to in paragraph (1) are:
   a. disclosure of net assets Periodic final Income Tax Returns;
   b. Periodic final Income Tax Returns in the context of the voluntary disclosure program; and
   c. the Notice of Taxable Objects.

(3) The administrative penalty in the form of a fine referred to in paragraph (1) are not imposed on:
   a. individual Taxpayers who have passed away and left no undivided inheritance;
   b. individual Taxpayers who no longer conduct business activities or personal independent services;
   c. Individual Taxpayers of Foreign National status who no longer reside in Indonesia and/or have not been present in Indonesia for more than 183 (one hundred and eighty-three) days in a period of 12 (twelve) months;
   d. permanent establishments that no longer conduct activities in Indonesia;
   e. Corporate Taxpayers that no longer conduct business activities but have not been dissolved pursuant to the applicable provisions;
   f. Government Agencies that no longer perform payments;
   g. Taxpayers affected by disasters, the provisions of which are stipulated by the Ministerial Regulation; or
   h. other Taxpayers.

(4) Other Taxpayers referred to in paragraph (3) subparagraph h are Taxpayers that are unable to file Tax Returns within the specified period due to:
   a. mass riots;
   b. fire;
   c. bomb explosions or acts of terrorism;
   d. inter-tribal warfare;
   e. failure of the state revenue administration or tax system; or
   f. other circumstances based on the considerations from the Director General of Taxes.

(5) The other Taxpayers referred to in paragraph (4) are determined through the Director General of Taxes Decree.

Article 180

(1) Certain Income Tax Taxpayers are excluded from the obligation to file Tax Returns.

(2) Certain Income Tax Taxpayers referred to in paragraph (1) are individual Taxpayers who fulfil the criteria stipulated by the Director General of Taxes.

Article 181

(1) Taxpayers may voluntarily amend Tax Returns that have been filed by submitting a written statement, provided that the Director General of Taxes has not submitted:
   a. the notice of Audit; or
   b. the notice of public preliminary audit,

   to the Taxpayer, representative, attorney, employees or adult family members of the Taxpayer.
(2) The written statement in the amended Tax Return referred to in paragraph (1) is conducted by placing a mark in the space provided in the Tax Return stating that the Taxpayer concerned amends the Tax Return.
(3) The Audit referred to in paragraph (1) subparagraph a is an Audit to assess compliance.
(4) In the event that the amended Tax Return referred to in paragraph (1) states a loss or overpayment, the amended Tax Return must be filed no later than 2 (two) years from the statute of limitation.
(5) In the event that the Taxpayer receives a Notice of Tax Assessment, Objection Decision Letter, Amendment Decision Letter, Appeal Decision or Civil Review Decision for the previous Tax Year or several previous Tax Years, which state a tax loss that is different from the tax loss that has been carried forward in the Annual Tax Return to be amended, the Taxpayer may amend the Annual Tax Return referred to in paragraph (1) within a period of 3 (three) months after receiving the Notice of Tax Assessment, Objection Decision Letter, Amendment Decision Letter, Appeal Decision or Civil Review Decision.
(6) In the event that the Taxpayer self-amends the Annual Tax Return resulting in Tax Liabilities becoming greater, they will be subject to an administrative penalty in the form of interest amounting to the monthly interest rate stipulated by the Minister of the amount of outstanding tax and imposed for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month as stipulated under Article 8 paragraph (2) of the General Provisions and Tax Procedures Law.
(7) In the event that the Taxpayer self-amends Periodic Tax Returns resulting in Tax Liabilities becoming greater, they will be subject to an administrative penalty in the form of interest amounting to the monthly interest rate stipulated by the Minister of the amount of outstanding tax and imposed no later than 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month as stipulated under Article 8 paragraph (2a) of the General Provisions and Tax Procedures Law.

Article 182

A Tax Return filed by a Taxpayer is subject to processing, which includes:
a. Tax Return Examination; and
b. Tax Return recording.

Article 183

(1) For the filing of the Periodic Tax Return and Annual Tax Return, Tax Return Examination is conducted as follows:
   a. the Tax Return is signed by the Taxpayer as stipulated under Article 3 paragraph (1) of the General Provisions and Tax Procedures Law;
   b. the Tax Return is filed in the Indonesian language using currency other than rupiah, for Taxpayers that have obtained a permit from the Minister to maintain Bookkeeping using a foreign language and in currency other than rupiah;
   c. the Tax Return is fully attached with the details and/or documents stipulated under Article 3 paragraph (6) of the General Provisions and Tax Procedures Law;
   d. the overpaid Tax Return is filed within a period of 3 (three) years after the end of the Taxable Period, the Tax Year or Fraction of a Tax Year and has been reprimanded in writing; and
   e. the Tax Return is filed before the Director General of Taxes conducts an Audit, public preliminary audit or issues the Notice of Tax Assessment.

(2) The provisions on having been reprimanded in writing referred to in paragraph (1) subparagraph d, shall not apply to overpaid Tax Returns for a Period, a Tax Year or a Fraction of a Tax Year at the time:
   a. the Taxpayer is not yet registered;
   b. the Taxpayer is a Non-active Taxpayer; or
   c. the Taxpayer is excluded from the obligation to file Tax Returns.

(3) For the amended Tax Return, in addition to being subject to the examination referred to in paragraph (1), an examination is also conducted for the fulfilment of the provisions on the amendment of the Tax Return stating loss or overpayment must be filed no later than 2 (two) years from the statute of limitation.

(4) The Audit referred to in paragraph (1) subparagraph e starts on the date the notice of Audit is submitted to the Taxpayer, representative, attorney, employees or adult family members of the Taxpayer.

(5) The public preliminary audit referred to in paragraph (1) subparagraph e starts on the date the notice of preliminary audit is submitted to the Taxpayer, representative, attorney or party that may represent the Taxpayer pursuant to statutory laws and regulations concerning preliminary audits.

(6) For the filing of the Notice of Taxable Objects, the Tax Return Examination is conducted pursuant to Article 85.

Article 184

For the electronic filing of the Tax Return referred to in Article 168 paragraph (1) subparagraph a that fulfils the provisions referred to in Article 183, the proof of receipt of the Tax Return is granted.

Article 185

Based on the Tax Return Examination referred to in Article 183, to the in-person filing of the Tax Return to the Tax Office, Tax Services, Dissemination and Consultation Office or other places determined by the Director General of Taxes referred to in Article 168 paragraph (1) subparagraph b, the following provisions shall apply:

a. in the event that the Tax Return has fulfilled the provisions referred to in Article 183, the proof of receipt of the Tax Return is granted; or
b. in the event that the Tax Return does not fulfil the provisions referred to in Article 183, the Tax Return is returned to the Taxpayer.

Article 186

Based on the Tax Return Examination referred to in Article 183, the filing of the Tax Return by post or a forwarding company or courier services referred to in Article 168 paragraph (1) subparagraph c, the following provisions shall apply:

a. in the event that the Tax Return has fulfilled provisions referred to in Article 183, the proof and the date of mailing is deemed as the proof and the date of the filing of the Tax Return; or
b. in the event that the Tax Return does not fulfil the provisions referred to in Article 183, the Tax Return shall be deemed not to filed.

Article 187

(1) In addition to the Tax Return that does not fulfil the provisions referred to in Article 183, a Tax Return filed by post or forwarding company or courier services referred to in Article 168 paragraph (1) subparagraph c is deemed not filed in the event that:
    a. the Taxpayer Identification Number is invalid;
    b. the Tax Return has been filed;
    c. the envelope does not contain the Tax Return;
    d. in one envelope, there are more than one Tax Returns;
    e. there is no payment of the Tax Return of underpayment status;
    f. there are miscalculations of and/or the amount of tax paid is not equal to the underpayment amount in the Tax Return; and/or
    g. the Taxpayer should file the Tax Return in the form of Electronic Documents.

(2) For the Tax Return deemed not filed referred to in paragraph (1), the Director General of Taxes submits a notice that the Tax Return is deemed not filed to the Taxpayer.

Article 188

A Tax Return that:

a. has been given proof of receipt for the Tax Return referred to in Article 184 and Article 185 or proof of postage considered as proof of filing of the Tax Return referred to in Article 186; and
b. for which a notice that the Tax Return is deemed not filed referred to in Article 187 paragraph (2) is not issued,

is recorded into the administration system of the Directorate General of Taxes.

Article 189

In the event that the Tax Return filed by a Taxpayer is a Tax Return of overpayment status with the application for the tax refund, the completion period for the application for the refund is calculated from the date the Tax Return is completely received.

Article 190

In the event that the filing of the Tax Return cannot be conducted through the administration system of the Directorate General of Taxes, the Director General of Taxes stipulates certain procedures in the context of the filing of the Tax Return concerned.

Section Two
Procedures for the Remittance, Filing and Exclusion from the Imposition of Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements as Well as the Amendments Thereto

Article 191

(1) Income received or accrued by an individual or Entity from:
   a. the transfer of the right to land and/or building; or
   b. land and/or building sale and purchase agreement as well as the amendments thereto,

   is subject to final Income Tax payable.

(2) The right to land and/or building referred to in paragraph (1) subparagraph a is all the rights to land and/or building, among others, may be in the form of:
   a. the ownership right, the right to cultivate, the right to build and the right to use as stipulated under the law concerning basic agrarian affair regulation; and
   b. the ownership right to a flat unit and ownership of a flat unit building as stipulated under the law concerning flats.

(3) The land and/or building sale and purchase agreement referred to in paragraph (1) subparagraph b is a sale and purchase agreement between the parties that may be in the form of a sale and purchase agreement, unit order letter, down payment receipt or other forms of agreement between the party selling or intending to sell the land and/or building and the party purchasing or intending to purchase the land and/or building.

(4) Income from the transfer of the right to land and/or building referred to in paragraph (1) subparagraph a is income received or accrued by the party transferring the right to land and/or building through sale, exchange, relinquishment of the right, transfer of the right, auction, grant, inheritance or other means agreed upon between the parties.

(5) Income from the land and/or building sale and purchase agreement as well as the amendments thereto referred to in paragraph (1) subparagraph b is income received or accrued by:
   a. the seller whose name is listed in the sale and purchase agreement when the agreement is first signed; or

b. the buyer whose name is listed in the sales purchase agreement before there is an amendment or addendum to the sale and purchase agreement, in the event of changes in the buyer in the sale and purchase agreement.

Article 192

(1) The Income Tax from the transfer of the right to land and/or building referred to in Article 191 paragraph (1) subparagraph a amounts to:
   a. 0% (zero per cent) of the transfer of the right to land and/or building to the government, State-Owned Enterprises that receive special assignments from the government or local-owned enterprises that receive special assignments from the regional head, stipulated under the law stipulating land acquisition for construction in the public interest;
   b. 1% (one per cent) of the gross amount of the value of the transfer of the right to land and/or building in the form of simple houses and simple flats conducted by Taxpayers whose main business is transferring the right to land and/or building; or
   c. 2.5% (two point five per cent) of the gross value of the transfer of the right to land and/or building, other than the transfer of the right to land and/or building referred to in subparagraph a and subparagraph b.

(2) The value of the transfer of the right to land and/or building referred to in paragraph (1) is:
   a. the value based on the decision of the competent authority, in the event of a transfer of the right to the government;
   b. the value according to the auction report, in the event that the transfer of right complies with the auction regulation (*Vendu Reglement Staatsblad* of 1908 Number 189 as well as the amendments thereto);
   c. the value actually received or accrued, in the event that the transfer of the right to land and/or building is conducted through a sale and purchase not influenced by a special relationship, other than the transfer referred to in subparagraph a and subparagraph b;
   d. the value that should be received or accrued, in the event the transfer of the right to land and/or building is conducted through a sale and purchase influenced by a special relationship, other than the transfer referred to in subparagraph a and subparagraph b; or
   e. the value that should be received or accrued based on the market price, in the event that the transfer of the right to land and/or building is conducted through exchange, relinquishment of the right, transfer of the right, grant, inheritance or other means agreed upon between the parties.

(3) The amount of Income Tax on Income from a land and/or building sale and purchase agreement as well as the amendments thereto referred to in Article 191 paragraph (1) subparagraph b is calculated based on the rate referred to in paragraph (1) of the gross amount, namely:

a. the value actually received or accrued, in the event that the transfer of land and/or building is conducted through a transfer not influenced by a special relationship; or
b. the value that should be received or accrued, in the event that the transfer of land and/or building is conducted through a transfer influenced by a special relationship.

(4) Simple houses and simple flats referred to in paragraph (1) subparagraph b shall comply with the criteria for simple houses and simple flats that obtain the exempt from Value Added Tax facility.

(5) Included in Taxpayers whose main business is transferring the right to land and/or building referred to in paragraph (1) subparagraph b, are Taxpayers whose business activities involve transferring the right to land and/or building as merchandise.

Article 193

(1) An individual or Entity that receives or accrues income from the transfer of the right to land and/or building referred to in Article 191 paragraph (1) subparagraph a, is required to self-remit the Income Tax payable referred to in Article 192 paragraph (1) subparagraph b and subparagraph c to the State Treasury, before the deed, decision, agreement or auction report for the transfer of the right to land and/or building are signed by the competent authority.

(2) In the event that income from the transfer of the right to land and/or building to a State-Owned Enterprise or local-owned enterprise is subject to a rate of 0% (zero per cent) referred to in Article 192 paragraph (1) subparagraph a, the Individual or Entity receiving or accruing income from the transfer of the right to land and/or building referred to in Article 191 paragraph (1) subparagraph a does not need to complete the Tax Payment Slip.

(3) For the individual or Entity that receives or accrues income from the transfer of the right to land and/or building referred to in Article 191 paragraph (1) subparagraph a, Income Tax referred to in paragraph (1) becomes payable at the time part or all of the payment of the transfer of the right to land and/or building is received.

(4) Income Tax referred to in paragraph (3) is calculated based on the amount of each payment, including down payment, interest, levies and other additional payments fulfilled by the buyer, in connection with the transfer of the right to land and/or building.

(5) Income Tax payable referred to in paragraph (4) must be paid by the individual or Entity concerned to the State Treasury no later than the 15th (fifteenth) of the following month after the month the payment is received.

(6) The Income Tax payment referred to in paragraph (1) and paragraph (3) is conducted for each transfer of the right to land and/or building.

(7) The competent authority only signs the deed, decision, agreement or auction report for the transfer of the right to land and/or building if to them, it is proven by the individuals or Entities that the obligation referred to in paragraph (1) has been fulfilled.

(8) The fulfilment of the obligation of the buyer referred to in paragraph (7) is proven by submitting a copy of the Tax Payment Slip or a printout of other administrative means equivalent to the Tax Payment Slip concerned which has been examined by the Head of the Tax Office.
(9) The competent authority referred to in paragraph (7) includes conveyancers, auctioneers or other officials who are authorised pursuant to statutory provisions.
(10) The Individual or Entity that does not fulfil the provisions referred to in paragraph (1) and paragraph (5) is subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 194

(1) The individual or Entity that receives or accrues income from the transfer of the right to land and/or building referred to in Article 191 paragraph (1) subparagraph a to the government is subject to Income Tax collection by the Government Agencies.
(2) Government Agencies referred to in paragraph (1) are required to remit Income Tax that has been collected to the State Treasury, before paying the individual or Entity entitled to receive it or before the exchange is implemented.
(3) The remittance of Income Tax referred to in paragraph (2) is conducted using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip on behalf of the Government Agencies.
(4) Government Agencies that do not fulfil the provisions referred to in paragraph (2) and paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 195

(1) The settlement of Income Tax payable on income from land and/or building sale and purchase agreement as well as the amendments thereto referred to in Article 191 paragraph (1) subparagraph b must be conducted through self-remittance to the State Treasury by an individual or Entity constituting:
    a. the seller referred to in Article 191 paragraph (5) subparagraph a; or
    b. the buyer referred to in Article 191 paragraph (5) subparagraph b.
(2) Income Tax referred to in paragraph (1) becomes payable at the time part or all of the payment is received.
(3) Income Tax referred to in paragraph (2) is calculated based on the amount of each payment, including down payment, interest, levies and other additional payments fulfilled by the buyer, in connection with the land and/or building sale and purchase agreement.
(4) Income Tax payable referred to in paragraph (2) must be paid by the individual or Entity concerned to the State Treasury no later than the 15th (fifteenth) of the following month after the month the payment is received.
(5) The Income Tax payment referred to in paragraph (2) is conducted for each land and/or building sale and purchase agreement.

(6) In the event that the seller has paid Income Tax payable referred to in paragraph (2) of the land and/or building sale and purchase agreement as well as the amendments thereto, the payment concerned is set off in the settlement of the Income Tax payable referred to in Article 192 paragraph (1) subparagraph b and subparagraph c insofar as the land and/or building sale and purchase agreement concerned is terminated by the preparation of a deed of transfer of the right to land and/or building.
(7) The seller referred to in Article 191 paragraph (5) subparagraph a only signs the amendment or addendum to the sale and purchase agreement if it is proven to him/her that the obligations of the buyer whose name is listed in the sale and purchase agreement before the amendment or addendum to the sale and purchase agreement referred to in Article 191 paragraph (5) subparagraph b have been fulfilled.
(8) The fulfilment of the obligations of the buyer referred to in paragraph (7) is proven by submitting a copy of the Tax Payment Slip or a printout of other administrative means equivalent to the Tax Payment Slip concerned which has been examined by the Head of the Tax Office.
(9) Individuals or Entities that do not fulfil the provisions referred to in paragraph (1) and paragraph (4) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 196

The Income Tax payment and remittance referred to in Article 193 paragraph (1) and paragraph (5), Article 194 paragraph (2) as well as Article 195 paragraph (4) to the State Treasury are conducted through the payment services or channels provided by Collecting Agents pursuant to statutory provisions on the electronic state revenue system.

Article 197

(1) For individuals or Entities referred to in Article 191 paragraph (1), Income Tax referred to in Article 192 paragraph (1) and paragraph (3) becomes payable at the residence of the individual concerned or domicile of the Entity where the Annual Income Tax Return of the individual Taxpayer or the Entity concerned is administered.
(2) In the event that the individual or Entity referred to in paragraph (1) transfers land and/or building to a Government Agency as referred to in Article 194 paragraph (1), Income Tax referred to in Article 192 paragraph (1) and paragraph (3) is payable at the domicile where the Government Agency Taxpayer is administered.

Article 198

(1) The Government Agency referred to in Article 194 paragraph (1) must prepare and submit a report on the transfer of the right to land and/or building no later than 20 (twenty) days after the month the transfer of the right concerned is conducted to the Tax Office where the Government Agency unit concerned is registered.
(2) A State-Owned Enterprise that receives a special assignment from the government or local-owned enterprise that receives a special assignment

from the regional head referred to in Article 192 paragraph (1) subparagraph a must:

a. prepare a list of the parties transferring the right to land and/or building and the land and/or building to be transferred concerned accompanied by a copy of the assignment letter and submit it to the official authorised to sign the deed of the transfer of the right as a substitute for the Tax Payment Slip referred to in Article 193 paragraph (7); and
b. prepare and submit the report on the transfer of the right to land and/or building in the context of the assignment concerned no later than 20 (twenty) days after the month the transfer of the right concerned is conducted to the Tax Office where the State-Owned Enterprise or local-owned enterprise concerned is registered.

(3) The official authorised to sign the deed, decision, agreement or auction report referred to in Article 193 paragraph (7) must submit a monthly report on the issuance of the deed, decision, agreement or auction report for the transfer of the right to land and/or building referred to in paragraph (1), no later than 20 (twenty) days after the month the transfer of the right concerned is conducted to the Tax Office where the official concerned is registered.

(4) The seller referred to in Article 191 paragraph (5) subparagraph a must submit a report on the amendment or addendum to the sale and purchase agreement for the transfer of assets in the form of land and/or building no later than 20 (twenty) days after the month the amendment or addendum to the sale and purchase agreement concerned is conducted to the Tax Office where the seller is registered.

(5) The report referred to in paragraph (3) is proof of the fulfilment of Income Tax obligations for the party transferring the right to land and/or building, the income of which is subject to a rate of 0% (zero per cent) referred to in Article 192 paragraph (1) subparagraph a.

Article 199

(1) Income received or accrued by Taxpayers, Article 4 paragraph (2) Income Tax that has been self-remitted and/or Article 4 paragraph (2) Income Tax that has been collected on the transfer of the right to land and/or building and land and/or building sale and purchase agreement as well as the amendments thereto must be filed to the Director General of Taxes by filing Unified Periodic Income Tax Returns by:

a. the individual or Entity required to self-remit Income Tax payable; or
b. the Government Agency required to withhold Income Tax payable,

no later than 20 (twenty) days after the Taxable Period ends.

(2) The individual or Entity referred to in paragraph (1) subparagraph a that has remitted Article 4 paragraph (2) Income Tax and the examination of the tax payment has been conducted is deemed to have filed the Unified Periodic Income Tax Returns according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(3) The Government Agency referred to in paragraph (1) subparagraph b is required to issue a collection receipt and submit it to the party that receives or accrues income.
(4) The obligation referred to in paragraph (3) remains applicable in the event that income from the transfer of the right to land and/or building to a Government Agency is subject to a rate of 0% (zero per cent).
(5) Individuals or Entities and Government Agencies that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 200

(1) Excluded from the obligation to pay or collect Income Tax referred to in Article 192 paragraph (1) and paragraph (3), are:
   a. individuals with income below the Personal Tax Relief transferring the right to land and/or building with a gross transfer amount of less than IDR60,000,000.00 (sixty million rupiah) and not constituting a split amount;
   b. individuals transferring assets in the form of land and/or building using a grant to family members related by blood in a lineage of one degree, religious bodies, educational bodies, social bodies, including foundations, cooperatives or individuals conducting micro and small businesses, the provisions of which are further stipulated by the Ministerial Regulation, insofar as the grant is not related to the business, employment, ownership or control between the parties concerned;
   c. Entities transferring assets in the form of land and/or building using a grant to religious bodies, educational bodies, social bodies, including foundations, cooperatives or individuals conducting micro and small businesses, the provisions of which are further stipulated by the Ministerial Regulation, insofar as the grant is not related to the business, employment, ownership or control between the parties concerned;
   d. transfers of assets in the form of land and/or building due to inheritance;
   e. Entities transferring assets in the form of land and/or building in the context of mergers, consolidations or spin-offs that have been determined by the Minister to use book value;
   f. individuals or Entities transferring assets in the form of a building in the context of executing a build-operate-transfer agreement, build-transfer-operate agreement or utilisation of state property in the form of land and/or building; or
   g. individuals or Entities not included in tax subjects transferring assets in the form of land and/or building.
(2) The exclusion from the obligation to pay or collect Income Tax referred to in paragraph (1) is granted by the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building

or a land and/or building sale and purchase agreement as well as the amendments thereto.

Section Three
Procedures for the Payment and Filing of Income Tax on Income from Transfers of Real Estate in Certain Collective Investment Contract Schemes

Article 201

(1) Income received or accrued by a Taxpayer from a transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme, is subject to final Income Tax payable.

(2) The certain Collective Investment Contract scheme referred to in paragraph (1) is an investment scheme in the form of a Collective Investment Contract with a Real Estate Investment Trust as a vehicle with or without using a Special Purpose Company.

Article 202

(1) The amount of Income Tax from the transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme referred to in Article 201 paragraph (1) is 0.5% (zero point five per cent) of the gross amount of the Real Estate transfer value.

(2) The gross amount of the transfer of Real Estate value referred to in paragraph (1) includes:
   a. the entire amount actually received or accrued by the Taxpayer from the Special Purpose Company or Collective Investment Contract for the transfer of Real Estate in a certain Collective Investment Contract scheme, in the event that the Taxpayer is not related to the Special Purpose Company or Collective Investment Contract; or
   b. the entire amount that should be received or accrued by the Taxpayer from the Special Purpose Company or Collective Investment Contract for the transfer of Real Estate in a certain Collective Investment Contract scheme in the event that the Taxpayer is related to the Special Purpose Company or Collective Investment Contract.

Article 203

(1) Income Tax referred to in Article 202 paragraph (1) must be self-paid by the Taxpayer transferring Real Estate to the State Treasury before the deed, decision, contract or agreement for the transfer of Real Estate to the Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme is signed by the competent authority.

(2) Income Tax referred to in paragraph (1) becomes payable at the time part or all of the payment is received for the transfer of Real Estate to the

Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme.

(3) Income Tax payable referred to in paragraph (2) is calculated based on the amount of each payment, including down payment, interest, levies and other additional payments, in connection with the transfer of Real Estate.

(4) Income Tax payable referred to in paragraph (2) must be paid no later than the 15th (fifteenth) of the following month after the month the payment is received.

(5) Income Tax referred to in paragraph (4) is paid to the State Treasury through the payment services or channels provided by Collecting Agents pursuant to statutory provisions on the electronic state revenue system.

(6) Taxpayers that do not fulfil the provisions referred to in paragraph (1) and paragraph (4) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 204

A Taxpayer transferring Real Estate and subject to Income Tax at the rate referred to in Article 202 paragraph (1) is required to:

a. submit a notice to the Head of the Tax Office where the Taxpayer is registered concerning the transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme, complemented by the following documents:
   1. a copy of the notice of the effectiveness of the Real Estate Investment Trust registration statement in the form of a Collective Investment Contract that is issued and has been legalised by the Financial Services Authority;
   2. statement from the Financial Services Authority that the Taxpayer transferring the Real Estate transacts with a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme;
   3. a stamped statement letter stating that the Taxpayer transfers the Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme; and
   4. a copy of the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for income from the transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme;

   and

b. fulfil the requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate.

Article 205

For the Taxpayer referred to in Article 201 paragraph (1), the Income Tax referred to in Article 202 paragraph (1) becomes payable at the place of registration of the Taxpayer, where the Annual Income Tax Return of the Taxpayer is administered.

Article 206

(1) The Taxpayer required to self-pay Income Tax payable referred to in Article 203 paragraph (1) is required to file income received or accrued and Income Tax that has been paid in a Taxable Period to the Director General of Taxes.

(2) The filing referred to in paragraph (1) is conducted through:
   a. Unified Periodic Income Tax Returns; and
   b. the notice concerning the transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme referred to in Article 204 letter a,

   no later than 20 (twenty) days after the Taxable Period ends.

(3) The Taxpayer referred to in paragraph (1) that has remitted Article 4 paragraph (2) Income Tax and an examination of the tax payment has been conducted, is deemed to have filed the Unified Periodic Income Tax Returns according to the date of payment listed in the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(4) Taxpayers that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 207

(1) The competent authority referred to in Article 203 paragraph (1) is an official authorised to sign the deed, decision, contract or agreement concerning the transfer of the right to land and/or building pursuant to statutory laws and regulations in the field of land affairs.

(2) The competent authority referred to in paragraph (1) may only sign a deed, decision, contract or agreement concerning the transfer of Real Estate if to them, it has been proven that:
   a. Income Tax referred to in Article 202 paragraph (1) has been paid by submitting a copy of the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip concerned to the Tax Payment Slip for income from the transfer of Real Estate, by showing the original; and
   b. the obligations referred to in Article 204 have been fulfilled, by submitting copies of the letters and/or documents as well as a copy of the proof of letter receipt from the Tax Office where the Taxpayer is registered.

(3) The competent authority referred to in paragraph (1) must submit a monthly report on the issuance of a deed, decision, agreement or auction report for the transfer of Real Estate, no later than 20 (twenty) days after the month the deed, decision, agreement or auction report is issued for the transfer of Real Estate concerned to the Tax Office where the official concerned is registered.

(4) Procedures for the examination of the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for income from the transfer of Real Estate referred to in paragraph (2) subparagraph a and referred to in Article 206 paragraph (3) are implemented pursuant to the

provisions on procedures for the examination of the Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for income from the transfer of the right to land and/or building and land and/or building sale and purchase agreement.

Section Four
Procedures for Withholding Tax and Income Tax Payment of Contractors' Other Income in the form of Uplift or Other Similar Fees and/or Contractors' Income from Transfers of Participating Interest

Article 208

(1) Other income of Contractors of Oil and Gas Cooperation Contract other than the Cooperation Contract in the form of Uplift or other similar fees is subject to final Income Tax at a rate of 20% (twenty per cent) of the gross amount.

(2) Other income of Contractors of Oil and Gas Cooperation Contract other than the Cooperation Contract in the form of a Participating Interest transfer is subject to final Income Tax at a rate of:
   a. 5% (five per cent) of the gross amount, for the Participating Interest transfer during the Exploration period; or
   b. 7% (seven per cent) of the gross amount, for the Participating Interest transfer during the Exploitation period.

(3) The Exploration period referred to in paragraph (2) subparagraph a is calculated from the effective date of the Cooperation Contract until the date of approval of the first field development plan in a Working Area of the Contractor of Oil and Gas Cooperation Contract.

(4) The Exploitation period referred to in paragraph (2) subparagraph b is calculated from the end of the Exploitation period referred to in paragraph (3) until the date the Cooperation Contract expires.

Article 209

(1) In the context of sharing risks in the Exploration period, the Participating Interest transfer is excluded from the imposition of Income Tax referred to in Article 208 paragraph (2) subparagraph a, in the event that the following criteria are fulfilled:
   a. not transferring all Participating Interest held;
   b. the Participating Interest has been held for more than 3 (three) years;
   c. in the Working Area, Exploration has been conducted and the Contractor of Oil and Gas Cooperation Contract has incurred investments to implement the Exploration concerned; and
   d. the Participating Interest transfer by the Contractor of Oil and Gas Cooperation Contract is not intended to seek profit.

(2) The imposition of Income Tax referred to in Article 208 paragraph (2) subparagraph b, is excluded insofar as to exercise the obligation to transfer Participating Interest according to the Cooperation Contract to national companies as outlined in the Cooperation Contract.

Article 210

The tax base for Income Tax on the Participating Interest transfer referred to in Article 208 paragraph (2) is:

a. the amount actually received or accrued by the Contractor of Oil and Gas Cooperation Contract; or
b. the amount that should be received or accrued by the Contractor of Oil and Gas Cooperation Contract, in the event that there is a special relationship stipulated under Article 18 paragraph (4) of the Income Tax Law between the parties transferring the Participating Interest.

Article 211

(1) In the event of a Participating Interest transfer, a Contractor of Oil and Gas Cooperation Contract is required to file the value of the Participating Interest transfer concerned to the Tax Office where the Contractor of Oil and Gas Cooperation Contract is registered accompanied by written documents in the form of the Participating Interest transfer contract and financial quarterly report (FQR) for the last quarter before the Participating Interest transfer occurs.
(2) In the event that the provisions referred to in paragraph (1) are not fulfilled by the Contractor of Oil and Gas Cooperation Contract, the Director General of Taxes may determine *ex officio* the amount of the transfer value of the Participating Interest.
(3) The filing referred to in paragraph (1) is conducted by:
    a. the Contractor of Oil and Gas Cooperation Contract receiving the Participating Interest transfer in the event that the recipient of the Participating Interest transfer has been registered as a Taxpayer; or
    b. the Contractor of Oil and Gas Cooperation Contract transferring the Participating Interest in the event that the recipient of the Participating Interest transfer has not been registered as a Taxpayer.
(4) Contractors of Oil and Gas Cooperation Contract referred to in paragraph (3) must file the value of the Participating Interest transfer referred to in paragraph (1) no later than 14 (fourteen) business days starting from the time the Participating Interest transfer contract is signed.

Article 212

(1) The time Income Tax becomes payable on income in the form of Uplift or other similar fees referred to in Article 208 paragraph (1) is the time income in the form of Uplift or other similar fees is paid or is recognised as a cost, depending on whichever event occurs first.
(2) Income Tax referred to in Article 208 paragraph (1) must be withheld by the Contractor of Oil and Gas Cooperation Contract paying the Uplift or other similar fees by issuing a withholding/collection receipt pursuant to statutory provisions.

Article 213

(1) The time Income Tax becomes payable on income from the Participating Interest transfer referred to in Article 208 paragraph (2) is at the time of

payment, the time of the Participating Interest transfer or at the time approval is granted to the Participating Interest transfer by the minister who administers governmental affairs in the field of energy and mineral resources, depending on whichever event occurs first.

(2) Income Tax referred to in Article 208 paragraph (2) must be withheld by the Contractor of Oil and Gas Cooperation Contract receiving the Participating Interest transfer by issuing a withholding/collection receipt pursuant to statutory provisions.

(3) In the event that the provisions referred to in paragraph (2) cannot be fulfilled because the Contractor of Oil and Gas Cooperation Contract receiving the Participating Interest transfer has not been registered as a Taxpayer, Income Tax payable concerned must be withheld, remitted and filed by the Contractor of Oil and Gas Cooperation Contract receiving the Participating Interest transfer after having been registered as a Taxpayer.

(4) In the event that the Participating Interest transfer is conducted indirectly and does not change the Taxpayer Identification Number, the Contractor of Oil and Gas Cooperation Contract transferring the Participating Interest is required to self-remit Income Tax payable.

Article 214

Income Tax referred to in Article 212 paragraph (2) and/or Article 213 paragraph (2) and paragraph (4), must be remitted to the State Treasury according to the period referred to in Article 94 paragraph (2).

Article 215

(1) The remitted Income Tax referred to in Article 214 must be filed by the Contractor of Oil and Gas Cooperation Contract that self-withholds or self-remits Income Tax payable.

(2) The filing referred to in paragraph (1) is conducted pursuant to the provisions on the period referred to in Article 171.

(3) Contractors of Oil and Gas Cooperation Contract that do not fulfil the provisions referred to in Article 212 paragraph (2), Article 213 paragraph (2), Article 213 paragraph (3), Article 213 paragraph (4), Article 214 and referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 216

(1) The taxable income after being deducted by final Income Tax from the Uplift or other similar fees referred to in Article 208 paragraph (1) and/or the income of Contractor of Oil and Gas Cooperation Contract from the Participating Interest transfer referred to in Article 208 paragraph (2), is subject to Income Tax payable pursuant to statutory laws and regulations in the field of Income Tax.

(2) To the Income Tax treatment of income other than that referred to in Article 208 paragraph (1) and paragraph (2), generally applicable statutory provisions in the field of Income Tax shall apply.

Section Five
Article 22 Income Tax Collection in Connection with Payments of Supplies of Goods and Activities in the Field of Imports or Business Activities in Other Sectors

Article 217

(1) The collection agents referred to in Article 22 of the Income Tax Law are:
   a. Foreign Exchange Banks and the Directorate General of Customs and Excise for:
      1. imports of goods; and
      2. exports of coal mining commodities, metallic minerals and non-metallic minerals conducted by exporters, except those conducted by Taxpayers bound in mining concession cooperation contracts and contracts of work.
   b. Government Agencies related to payment of purchases of goods, conducted using Petty Cash mechanism or direct payment mechanism;
   c. certain business entities, including:
      1. State-Owned Enterprises;
      2. business entities and State-Owned Enterprises resulting from restructuring conducted by the government and the restructuring is conducted through the transfer of state-owned shares to other State-Owned Enterprises; and
      3. certain business entities directly held by State-Owned Enterprises, including PT Pupuk Sriwidjaja Palembang, PT Petrokimia Gresik, PT Pupuk Kujang, PT Pupuk Kalimantan Timur, PT Pupuk Iskandar Muda, PT Telekomunikasi Selular, PT Indonesia Power, PT Pembangkitan Jawa-Bali, PT Semen Padang, PT Semen Tonasa, PT Elnusa Tbk, PT Krakatau Wajatama, PT Rajawali Nusindo, PT Wijaya Karya Beton Tbk, PT Kimia Farma Apotek, PT Kimia Farma Trading & Distribution, PT Badak Natural Gas Liquefaction, PT Tambang Timah, PT Terminal Petikemas Surabaya, PT Indonesia Comnets Plus, PT Bank Syariah Indonesia Tbk,

      related to payment of purchases of goods and/or materials for business activity purposes;
   d. business entities engaged in the cement industry, paper industry, steel industry, automotive industry and pharmaceutical industry, for the sales of their products to domestic distributors;
   e. sole licensee agents, licensee agents and general importers of motor vehicles, for domestic sales of motor vehicles;
   f. manufacturers or importers of oil fuel, gas fuel and lubricants, for the sales of oil fuel, gas fuel and lubricants;
   g. industrial business entities or exporters purchasing materials in the form of forestry, plantation, agricultural, livestock and fishery products that have not undergone the manufacturing process, for their industrial or export purposes; and

h. business entities purchasing mining commodities coal, metallic minerals and non-metallic minerals, from Entities or individuals holding mining business permits.

(2) In the event that the certain business entities referred to in paragraph (1) subparagraph c number 3 change the name of the business entities, the certain business entities remain appointed as collection agents stipulated under Article 22 of the Income Tax Law.

(3) In the event that certain business entities referred to in paragraph (1) subparagraph c number 3 are no longer directly held by State-Owned Enterprises, certain business entities concerned are no longer appointed as collection agents stipulated under Article 22 of the Income Tax Law.

(4) Business entities engaged in the steel industry referred to in paragraph (1) subparagraph d are the steel industry constituting an upstream industry, including upstream industries integrated with intermediate industries and downstream industries.

(5) The mining business permits referred to in paragraph (1) subparagraph h are as referred to in statutory provisions in the field of mineral and coal mining.

Article 218

(1) The amount of Article 22 Income Tax collection is determined as follows:
   a. for the collection by the Directorate General of Customs and Excise on:
      1. imports of:
         a) certain goods of 10% (ten per cent) of the import value with or without using an import identification number;
         b) other certain goods of 7.5% (seven point five per cent) of the import value with or without using an import identification number;
         c) goods in the form of soybeans, wheat and wheat flour of 0.5% (zero point five per cent) of the import value using import identification number;
         d) goods other than the goods referred to in letter a), letter b) and letter c) that use an import identification number, of 2.5% (two point five per cent) of the import value;
         e) the goods referred to in letter c) and letter d) that do not use an import identification number, of 7.5% (seven point five per cent) of the import value; and
         f) uncontrolled goods, of 7.5% (seven point five per cent) of the auction selling price;

         and
      2. exports of coal mining commodities, metallic minerals and non-metallic minerals, according to the description of goods and harmonized system codes by the exporter, except those conducted by Taxpayers bound in mining concession cooperation contracts and contracts of work, of 1.5% (one point five per cent) of the export value listed in the export declaration;

b. for purchases of goods referred to in Article 217 paragraph (1) subparagraph b and the purchases of goods and/or materials for business activity purposes referred to in Article 217 paragraph (1) subparagraph c of 1.5% (one point five per cent) of the purchase price, excluding Value Added Tax;
c. for sales of oil fuel, gas fuel and lubricants by manufacturers or the importers of oil fuel, gas fuel and lubricants as follows:
    1. oil fuel of:
        a) 0.25% (zero point twenty-five per cent) of the sales, excluding Value Added Tax for sales to public petrol stations that sell oil fuel purchased from PT Pertamina (Persero) or subsidiaries of PT Pertamina (Persero);
        b) 0.3% (zero point three per cent) of the sales, excluding Value Added Tax for sales to public petrol stations that sell oil fuel purchased other than from PT Pertamina (Persero) or subsidiaries of PT Pertamina (Persero); and
        c) 0.3% (zero point three per cent) of the sales, excluding Value Added Tax for sales to parties other than those referred to in letter a) and letter b);
    2. gas fuel of 0.3% (zero point three per cent) of the sales, excluding Value Added Tax; and
    3. lubricants of 0.3% (zero point three per cent) of the sales, excluding Value Added Tax;
d. for sales of products to domestic distributors by business entities engaged in the business sectors of the cement industry, paper industry, steel industry, automotive industry and pharmaceutical industry:
    1. sales of all types of cement of 0.25% (zero point twenty-five per cent);
    2. sales of paper of 0.1% (zero point one per cent);
    3. sales of steel of 0.3% (zero point three per cent);
    4. sales of all types of motor vehicles with two or more wheels, excluding heavy equipment, of 0.45% (zero point forty-five per cent); and
    5. sales of all types of medicine of 0.3% (zero point three per cent), of the tax base for Value Added Tax;
e. for domestic sales of motor vehicles by sole licensee agents, licensee agents and general importers of motor vehicles, excluding heavy equipment, of 0.45% (zero point forty-five per cent) of the tax base for Value Added Tax;
f. for purchases of materials in the form of forestry, plantation, agricultural, livestock and fishery products that have not undergone the manufacturing industry process by industrial business entities or exporters of 0.25% (zero point twenty-five per cent) of the purchase price, excluding Value Added Tax; and
g. for purchases of coal, metallic minerals and non-metallic minerals, from Entities or individuals holding mining business permits by

industries or business entities of 1.5% (one point five per cent) of the purchase price, excluding Value Added Tax.

(2) The import value referred to in paragraph (1) subparagraph a number 1 is the value in the form of money constituting the basis for the calculation of import duty, namely cost insurance and freight plus import duty and other levies imposed pursuant to statutory provisions in the field of customs.

(3) The export value listed in the export declaration referred to in paragraph (1) subparagraph a number 2 is the free on board value listed in the export declaration, including the export declaration whose export value has been amended.

(4) The amount of Article 22 Income Tax collection on purchases of materials in the form of forestry, plantation, agricultural, livestock and fishery products that have not undergone the industrial manufacturing process by certain business entities referred to in Article 217 paragraph (1) subparagraph c constituting industrial business entities or exporters is conducted pursuant to the provisions referred to in paragraph (1) subparagraph f.

Article 219

(1) Excluded from Article 22 Income Tax collection are:
   a. imports of goods and/or supplies of goods that pursuant to statutory provisions are not subject to Income Tax payable;
   b. imports of goods exempt from import duty and/or Value Added Tax in the form of:
      1. goods of foreign missions as well as their officials serving in Indonesia based on the principle of reciprocity;
      2. goods for the purposes of international bodies as well as their officials serving in Indonesia and do not hold Indonesian passports that are recognised and registered in the Ministerial Regulation stipulating procedures for the granting of the import duty and excise exemption for imports of goods for the purposes of international bodies and their officials serving in Indonesia;
      3. gifts/grants for public worship, charity, social, cultural or disaster management purposes;
      4. goods for the needs of museums, zoos, nature conservation and other similar publicly accessible places;
      5. goods for scientific research and development purposes;
      6. goods for the special needs of the blind and other persons with disabilities;
      7. caskets or other packages containing bodies or ashes;
      8. personal effects;
      9. goods imported by the central government or local governments intended for the public interest;
      10. weapons, ammunition and military equipment, including spare parts thereof intended for state defence and security purposes;

11. goods and materials used to produce goods for national defence and security purposes;
12. polio vaccine in the context of the implementation of the national immunisation week programme;
13. science and technology books, general textbooks, scriptures, religious textbooks and other science books;
14. ships, river vessels, lake vessels and ferries, pilot boats, tugboats, fishing vessels, barges and spare parts thereof as well as marine safety equipment and personal protective equipment imported and used by the National Commercial Shipping Company or National Fishing Company, National Port Service Provider Company or National River, Lake and Ferry Transport Service Provider Company, according to their business;
15. aircraft and spare parts thereof as well as aviation safety equipment and personal protective equipment, equipment for repair and maintenance imported and used by the National Commercial Air Transportation Company and spare parts thereof as well as equipment for aircraft repair and maintenance imported by parties appointed by the National Commercial Air Transportation Company used in the context of the granting of aircraft maintenance and repair services to the National Commercial Air Transportation Company;
16. trains and spare parts thereof as well as equipment for repair and maintenance as well as railway infrastructure imported and used by business entities operating public railway facilities and/or business entities operating public railway infrastructure and components or materials imported by parties appointed by business entities operating public railway means and/or business entities operating public railway infrastructure used to manufacture trains, spare parts, equipment for repair and maintenance as well as railway infrastructure which will be used by business entities operating public railway means and/or business entities operating public railway infrastructure;
17. equipment as well as spare parts thereof used by the Ministry of Defence or the Indonesian National Armed Forces for the provision of border data and aerial photographs of the territory of the Unitary State of the Republic of Indonesia carried out to support National defences, imported by the Ministry of Defence or the Indonesian National Armed Forces or parties appointed by the Ministry of Defence or the Indonesian National Armed Forces;
18. goods for upstream oil and gas activities imported by contractors of cooperation contracts; and
19. goods for geothermal businesses;

c. temporary admission, if at the time of import, are clearly intended to be re-exported;
d. re-imports, which include goods that have been exported and subsequently re-imported in the same quality or goods that have

been exported for repair, work and testing purposes, which have fulfilled the requirements determined by the Directorate General of Customs and Excise.

e. payments performed by collection agents referred to in Article 217 paragraph (1) subparagraph b, subparagraph c, subparagraph g and subparagraph h related to:
   1. payments performed by collection agents referred to in Article 217 paragraph (1) subparagraph b:
      a. amounting to a maximum of IDR2,000,000.00 (two million rupiah), excluding Value Added Tax and do not constitute split payments of transactions with an actual value of more than IDR2,000,000.00 (two million rupiah);
      b. payment of purchases of goods conducted using Government Agency credit cards;
      c. payments of purchases of oil fuel, gas fuel, lubricants, postal items or water and electricity consumption;
      d. payments of purchases of goods in connection with the use of school operational assistance funds, operational assistance for the administration of early childhood education or other operational assistance for the administration of education, pursuant to statutory provisions in the field of education;
      e. payments of purchases of paddy and/or rice;
      f. payments to government partners that have and submit a copy of the certificate explaining that the Taxpayer is subject to Income Tax pursuant to statutory provisions stipulating Income Tax on business income received or accrued by the Taxpayer with a certain gross turnover;
      g. payments to government partners that may submit a copy of the Withholding Tax and/or Income Tax collection exemption certificate pursuant to statutory provisions stipulating procedures for the submission of the application for the exemption from Withholding Tax and/or Income Tax collection; or
      h. payments using the Petty Cash mechanisms for purchases of goods conducted through Other Parties in the government procurement administration system, that have been subject to Article 22 Income Tax collection by Other Parties;
   2. payments performed by collection agents referred to in Article 217 paragraph (1) subparagraph c amounting to a maximum of IDR10,000,000.00 (ten million rupiah), excluding Value Added Tax and do not constitute split payments of transactions with an actual value of more than IDR10,000,000.00 (ten million rupiah);
   3. payments of:
      a. purchases of oil fuel, gas fuel, lubricants, postal items; and
      b. water and electricity consumption;

4. payments of purchases of oil, gas and/or by-products from upstream business activities in the field of oil and gas produced in Indonesia from:
    a. contractors conducting exploration and exploitation based on cooperation contracts;
    b. head office of contractors conducting exploration and exploitation based on cooperation contracts; or
    c. trading arms of contractors conducting exploration and exploitation based on cooperation contracts.
5. payments of purchases of geothermal or electricity resulting from geothermal concession from Taxpayers conducting business in the geothermal business sector based on geothermal resource concession cooperation contracts;
6. purchases of materials in the form of forestry, plantation, agricultural, livestock and fishery products that have not undergone the manufacturing process for industrial or export purposes by industrial business entities or exporters referred to in Article 217 paragraph (1) subparagraph g, amounting to a maximum of IDR20,000,000.00 (twenty million rupiah), excluding Value Added Tax in one Taxable Period; and
7. purchases of coal, metallic minerals and non-metallic minerals from Entities or individuals holding mining business permits referred to in Article 217 paragraph (1) subparagraph h that have been subject to Article 22 Income Tax collection on purchases of goods and/or materials for business activity purposes by certain business entities referred to in Article 217 paragraph (1) subparagraph c;

f. imports of gold bullion that will be processed to produce gold jewellery for export purposes;
g. domestic sales of motor vehicles conducted by the automotive industry, sole licensee agents, licensee agents and general importers of motor vehicles, that have been subject to Income Tax collection pursuant to the provisions under Article 22 paragraph (1) subparagraph c of the Income Tax Law and the implementing regulations;
h. purchases of paddy and/or rice by the Indonesian bureau of logistics; and
i. purchases of staple food in the context of maintaining food availability and stabilising food prices by the Indonesian bureau of logistics or other State-Owned Enterprises receiving assignments pursuant to statutory provisions.

(2) The exclusion from Article 22 Income Tax collection on imported goods referred to in paragraph (1) subparagraph b remains applicable in the event that the imported goods are:
    a. subject to import duty tariff of 0% (zero per cent); or
    b. subject to Value Added Tax but not collected.

(3) The exclusion referred to in paragraph (1) subparagraph a and subparagraph f is declared with an Article 22 Income Tax exemption certificate issued by the Director General of Taxes.
(4) The exclusion referred to in paragraph (1) subparagraph d, subparagraph e, subparagraph g, subparagraph h and subparagraph i is conducted without an exemption certificate.

Article 220

(1) Article 22 Income Tax on an import of goods, becomes payable and is settled simultaneously with the time of payment of import duty.
(2) In the event that the payment of import duty is deferred or exempt and not included in the exclusion from Article 22 Income Tax collection referred to in Article 219 paragraph (1) subparagraph b, Article 22 Income Tax becomes payable and is settled at the time the customs declaration documents for the import are completed.
(3) Article 22 Income Tax on an export of coal mining commodities, metallic minerals and non-metallic minerals becomes payable and is remitted simultaneously with the time the customs declaration documents for the export are completed.
(4) Article 22 Income Tax on the purchase of goods referred to in Article 217 paragraph (1) subparagraph b and purchase of goods and/or materials for business activity purposes referred to in Article 217 paragraph (1) subparagraph c becomes payable and is collected at the time of payment.
(5) Article 22 Income Tax on the sales of products referred to in Article 217 paragraph (1) subparagraph d and the sales of motor vehicles referred to in Article 217 paragraph (1) subparagraph e becomes payable and is collected at the time of the sale.
(6) Article 22 Income Tax on the sales of oil fuel, gas fuel and lubricants referred to in Article 217 paragraph (1) subparagraph f becomes payable and is collected at the time the delivery order is issued.
(7) Article 22 Income Tax on the purchase of materials referred to in Article 217 paragraph (1) subparagraph g and the purchase of coal, metallic minerals and non-metallic minerals referred to in Article 217 paragraph (1) subparagraph h becomes payable and is collected at the time of the purchase.

Article 221

(1) Article 22 Income Tax is collected on an import of goods using remittance by:
    a. the importer concerned; or
    b. the Directorate General of Customs and Excise,
    to the State Treasury through a Collecting Agent.
(2) Article 22 Income Tax collection on an export of coal mining commodities, metallic minerals and non-metallic minerals is conducted using remittance by the exporter concerned to the State Treasury through the Collecting Agent.

(3) Article 22 Income Tax collection by the collection agent referred to in Article 217 paragraph (1) subparagraph b to subparagraph h, must be remitted by the collection agent to the State Treasury using the Taxpayer Identification Number of the collection agent.
(4) The tax remittance referred to in paragraph (3) is conducted to the State Treasury through payment services or channels provided by the Collecting Agent pursuant to statutory provisions on the electronic state revenue system.
(5) For the tax remittance receipt referred to in paragraph (2), the Directorate General of Customs and Excise conducts a formal audit of the tax remittance receipt as complementary documents for the export declaration and is used as the basis for export services.
(6) The formal audit referred to in paragraph (5) is implemented by officials of the Directorate General of Customs and Excise and/or the service computer system.

Article 222

(1) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for the remittance of Article 22 Income Tax by the importer, exporter of coal mining commodities, metallic minerals and non-metallic minerals and the Directorate General of Customs and Excise referred to in Article 217 paragraph (1) subparagraph a applies as the collection receipt in the event that the payment of tax has been validated.
(2) In the event that Article 22 Income Tax referred to in paragraph (1) is remitted in stages, the remitted Article 22 Income Tax may be taken into account as Income Tax payment in the current year for the party subject to the collection using documents in the form of the notice of import duty, excise and/or tax payment assessment, payment receipt, consignment note or other documents issued by the Directorate General of Customs and Excise, as documents equivalent to the withholding/collection receipt, insofar as Article 22 Income Tax payable has been remitted to the State Treasury.
(3) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip for Article 22 Income Tax remitted in stages referred to in paragraph (2) does not apply as a collection receipt.

Article 223

(1) The collection agents referred to in Article 217 paragraph (1) subparagraph b to subparagraph h, are required to collect and prepare the Article 22 Income Tax collection receipt.
(2) The collection agents referred to in paragraph (1) submit the Article 22 Income Tax collection receipt to the Taxpayer subject to the collection.
(3) The preparation of the collection receipt referred to in paragraph (1) and documents equivalent to the collection receipt referred to in Article 222 paragraph (2) shall comply with the provisions on the preparation of Income Tax collection receipts.

(4) The collection agents referred to in paragraph (1) are required to file Article 22 Income Tax to the Director General of Taxes no later than 20 (twenty) days after the Taxable Period ends using Unified Periodic Income Tax Returns.

Article 224

(1) The Article 22 Income Tax remittance referred to in Article 221 pursuant to the provisions referred to in Article 94 and the filing of Article 22 Income Tax collection referred to in Article 223 are conducted pursuant to the provisions referred to in Article 171.
(2) Collection agents that do not fulfil the provisions referred to in Article 221 and Article 223 are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 225

(1) Article 22 Income Tax collection referred to in Article 217 paragraph (1) subparagraph a, subparagraph b, subparagraph c, subparagraph d, subparagraph e, subparagraph g and subparagraph h, is non-final and may be taken into account as Income Tax payment in the current year for the Taxpayer subject to the collection.
(2) Article 22 Income Tax collection referred to in Article 217 paragraph (1) subparagraph f on the sales of oil fuel and gas fuel to:
    a. distributors/agents is final; and
    b. other than distributors/agents is non-final and may be taken into account as the payment of Income Tax in the current year for the Taxpayer subject to the collection.
(3) Article 22 Income Tax collection referred to in Article 217 paragraph (1) subparagraph f on the sales of lubricants is non-final and may be taken into account as Income Tax payment in the current year for the Taxpayer subject to the collection.

Section Six

The Calculation of Income Tax Instalments in the Current Tax Year That Must Be Paid by New Taxpayers, Banks, State-Owned Enterprises, Local-Owned State Enterprises, Public-Listed Taxpayers, Other Taxpayers That Pursuant to the Provisions Are Required to Prepare Periodic Financial Statements and Certain Entrepreneur Individual Taxpayers

Article 226

(1) Article 25 Income Tax Instalment amounts to Income Tax payable according to the Taxpayer's Annual Income Tax Return for the previous Tax Year deducted by:
    a. Withholding Tax stipulated under Article 21 of the Income Tax Law and Article 23 of the Income Tax Law as well as Income Tax that is collected stipulated under Article 22 of the Income Tax Law; and
    b. Income Tax that is paid or payable overseas that may be credited stipulated under Article 24 of the Income Tax Law,

    divided by 12 (twelve) or the number of months in a Fraction of a Tax Year.

(2) The Article 25 Income Tax Instalments referred to in paragraph (1) shall not apply to the calculation of the amount of Article 25 Income Tax Instalments for:
   a. New Taxpayers;
   b. banks, State-Owned Enterprises, local-owned enterprises, public-listed Taxpayers and Other Taxpayers; and
   c. Certain Entrepreneur Individual Taxpayers.

Article 227

(1) The basis for the calculation of Article 25 Income Tax Instalments for bank Taxpayers is the financial statements submitted to the Financial Services Authority which consist of the statement of financial position and income statement from the beginning of the Tax Year until the filed Taxable Period.
(2) Article 25 Income Tax Instalments for bank Taxpayers are calculated based on the application of the rates under Article 17 of the Income Tax Law to net income based on the financial statements referred to in paragraph (1) deducted by:
   a. Withholding Tax and/or Income Tax collection stipulated under Article 22 of the Income Tax Law from the beginning of the Tax Year until the filed Taxable Period; and
   b. Income Tax stipulated under Article 25 of the Income Tax Law that should be paid from the beginning of the Tax Year until the Taxable Period before the filed Taxable Period.
(3) The net income referred to in paragraph (2) excludes:
   a. foreign-sourced income received or accrued by Taxpayers; and
   b. income and expenses as deductions from net income subject to final Income Tax and/or non-Income Tax object.
(4) In the event that a Taxpayer has a loss that may be set off, the loss is offset against the net income referred to in paragraph (2).

Article 228

(1) The basis for the calculation of Article 25 Income Tax Instalments for:
   a. Other Taxpayers; and
   b. public-listed Taxpayers other than bank Taxpayers,

   shall be financial statements submitted every 3 (three) months to the stock exchange and/or the Financial Services Authority which consist of the statement of financial position and income statement from the beginning of the Tax Year until the filed period.
(2) Article 25 Income Tax Instalments for Taxpayers stipulated under paragraph (1) are calculated based on the application of rates stipulated under Article 17 of the Income Tax Law to net income based on financial statements referred to in paragraph (1) deducted by:
   a. Withholding Tax and/or Income Tax collection stipulated under Article 22 and Article 23 of the Income Tax Law from the beginning of the Tax Year until the Taxable Period of the filed period; and

b. Income Tax stipulated under Article 25 of the Income Tax Law that should be paid from the beginning of the Tax Year until the Taxable Period of the filed period.

(3) The net income referred to in paragraph (2) excludes:
a. foreign-sourced income received or accrued by Taxpayers; and
b. income and expenses as deductions from net income subject to final Income Tax and/or not constituting an Income Tax object.

(4) In the event that a Taxpayer has a loss that may be set off, the loss is offset against the net income referred to in paragraph (2).

(5) Article 25 Income Tax Instalments referred to in paragraph (2) are Article 25 Income Tax Instalments for 3 (three) Taxable Periods after the filed period.

Article 229

(1) Article 25 Income Tax Instalments for State-Owned Enterprise and local-owned enterprise Taxpayers in whatever name and form other than:
a. bank Taxpayers;
b. public-listed Taxpayers; and/or
c. Other Taxpayers,
are calculated based on the application of the rates under Article 17 of the Income Tax Law to the fiscal net income based on the Work Plans and Budget for the Tax Year concerned that have been ratified by the General Meeting of Shareholders deducted by Article 22 Withholding Tax and/or Article 22 Income Tax collection and Article 23 Withholding Tax and/or Article 23 Income Tax Collection as well as Article 24 Income Tax paid or payable overseas for the previous Tax Year, divided by 12 (twelve).

(2) The Work Plans and Budget referred to in paragraph (1) must be submitted to the Directorate General of Taxes through the Tax Office where the Taxpayer is registered.

(3) The Work Plans and Budget referred to in paragraph (2) must be submitted no later than the payment deadline for Article 25 Income Tax for the first Taxable Period in the current Tax Year.

Article 230

(1) In the event that the financial statements referred to in Article 227 paragraph (1) and Article 228 paragraph (1) have not been filed, the amount of Article 25 Income Tax Instalment is equal to the Article 25 Income Tax Instalment for the previous Taxable Period.

(2) In the event that the Work Plans and Budget referred to in Article 229 paragraph (1) have not been ratified, the amount of Article 25 Income Tax Instalments for the months before the month of ratification is equal to the Article 25 Income Tax Instalment for the last month of the previous Tax Year.

(3) In the event that the Taxpayer has submitted:
a. the financial statements referred to in paragraph (1); or
b. the Work Plans and Budget referred to in paragraph (2) that have been ratified,

the amount of Article 25 Income Tax Instalment for the months starting from the filing deadline for the statements until the month before the statements are filed is recalculated by taking into account the provisions under Article 227, Article 228 and Article 229 calculated from the filing deadline for the statements.

(4) If the amount of the Article 25 Income Tax Instalment referred to in paragraph (3) is greater, the under-remittance of the Article 25 Income Tax Instalment:
   a. must be remitted in the Taxable Period at the time the financial statements and/or the Work Plans and Budget referred to in paragraph (3) are submitted; and
   b. the Taxpayer is subject to administrative penalties stipulated under the General Provisions and Tax Procedures Law.

(5) If the amount of Article 25 Income Tax Instalment referred to in paragraph (3) is lower, for the over-remittance of Article 25 Income Tax Instalment, a refund of the tax overpayment that should not otherwise be payable may be requested or may be credited in the Annual Income Tax Return.

Article 231

(1) For bank Taxpayers referred to in Article 227, in the event that the annual financial statements are not yet available until the remittance deadline for Article 25 Income Tax Instalment for the last Taxable Period in the accounting year because they are still under the audit process pursuant to statutory provisions in the field of banking, the amount of Article 25 Income Tax Instalment for the last Taxable Period in the accounting year shall be equal to the Article 25 Income Tax Instalment for the previous Taxable Period.

(2) For Other Taxpayers and public-listed Taxpayers other than the bank Taxpayers referred to in Article 228 that are not required to file financial statements for the fourth quarter, the amount of Article 25 Income Tax Instalment that is paid for the Taxable Period of the first quarter in the current year shall be equal to the Article 25 Income Tax Instalment for the last Taxable Period in the previous Tax Year.

Article 232

(1) For public-listed Taxpayers that in the previous Tax Year obtained the rate reduction facility stipulated under Article 17 paragraph (2b) of the Income Tax Law, the calculation of Article 25 Income Tax Instalment uses the previous Tax Year rates.

(2) For State-Owned Enterprise Corporate Taxpayers, local-owned enterprises, public-listed Taxpayers and Other Taxpayers that obtain the net income reduction facility stipulated under:
   a. Article 31A of the Income Tax Law;
   b. Article 29A of Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year as amended by Government Regulation Number 45 of 2019 concerning the Amendment to

Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year; and/or

c. Article 78 of Government Regulation Number 40 of 2021 concerning the Administration of Special Economic Zones,

net income constituting the basis for the calculation of Article 25 Income Tax Instalments is net income deducted by the amount of the received facility.

(3) For bank Taxpayers, State-Owned Enterprises, local-owned enterprises, public-listed Taxpayers and Other Taxpayers that obtain the Corporate Income Tax exemption or reduction facility stipulated under:

a. Article 29 paragraph (1) of Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year as amended by Government Regulation Number 45 of 2019 concerning the Amendment to Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year;

b. Article 75 of Government Regulation Number 40 of 2021 concerning the Administration of Special Economic Zones; and/or

c. Article 28, Article 30, Article 32 and Article 35, Government Regulation Number 12 of 2023 concerning the Granting of Business Permits, Ease of Doing Business and Investment Facilities to Entrepreneurs in the Nusantara Capital as amended by Government Regulation Number 29 of 2024 concerning the Amendment to Government Regulation Number 12 of 2023 concerning the Granting of Business Permits, Ease of Doing Business and Investment Facilities to Entrepreneurs in the Nusantara Capital,

Article 25 Income Tax Instalment payable takes into account the Income Tax exemption or reduction facility.

(4) For Taxpayers that obtain the rate reduction facility of 50% (fifty per cent) stipulated under Article 31E paragraph (1) of the Income Tax Law in the previous Tax Year, Article 25 Income Tax Instalment payable takes into account the rate reduction facility.

Article 233

Banks, State-Owned Enterprises, local-owned enterprises, public-listed Taxpayers and Other Taxpayers must file the report on the calculation of Article 25 Income Tax instalments to the Director General of Taxes no later than 20 (twenty) days after the end of the filing period.

Article 234

(1) Article 25 Income Tax Instalments for Certain Entrepreneur Individual Taxpayers, is set at 0.75% (zero point seventy-five per cent) of the amount of gross turnover every month from each place of business, including the place of business located in the Taxpayer's residence.

(2) The payment of Article 25 Income Tax Instalments of each place of business referred to in paragraph (1) constitutes a tax credit for Income Tax payable for the Tax Year concerned.

Article 235

Article 25 Income Tax Instalments for New Taxpayers that constitute:

a. bank Taxpayers;
b. public-listed Taxpayers;
c. State-Owned Enterprise Corporate Taxpayers;
d. local-owned enterprises Taxpayers;
e. Other Taxpayers; and/or
f. Certain Entrepreneur Individual Taxpayers,

shall comply with the provisions referred to in Article 227, Article 228, Article 229 and Article 231.

Article 236

(1) Article 25 Income Tax Instalments for New Taxpayers in the context of a merger, consolidation and/or acquisition for the remainder of the current Tax Year are set at the sum of Article 25 Income Tax Instalments of all related Taxpayers before the merger, consolidation and/or acquisition.
(2) Article 25 Income Tax Instalments for Taxpayers in the context of a spin-off, the amount of Article 25 Income Tax Instalments for all Taxpayers resulting from the spin-off are set at Article 25 Income Tax Instalments before the spin-off.
(3) The Article 25 Income Tax Instalments referred to in paragraph (2) for each Taxpayer resulting from the spin-off are calculated based on the percentage of the value of the transferred assets.
(4) Article 25 Income Tax Instalments for New Taxpayers resulting from changes in the form of business entities in the current Tax Year are set to amount to the Article 25 Income Tax Instalment for the last month before the change in the form of business entities.
(5) In the event that the New Taxpayers referred to in Article 235 letter a to letter e are New Taxpayers resulting from the merger, consolidations, acquisition and/or spin-off, the calculation of Article 25 Income Tax Instalments shall comply with the provisions referred to in paragraph (1) and paragraph (2).

Article 237

Article 25 Income Tax Instalments for New Taxpayers other than the New Taxpayers referred to in Article 235 and Article 236 in the current Tax Year are set at nil.

Section Seven
Article 26 Withholding Tax on Income Received or Accrued by Non-Resident Taxpayers Other Than Permanent Establishments for Income in the Form of Gains from the Sales of Shares

Article 238

(1) Income from sales of Company shares accrued by non-resident Taxpayers other than permanent establishments is subject to withholding tax of 20% (twenty per cent) of the estimated net income.
(2) For non-resident Taxpayers domiciled in countries that have entered into a Tax Treaty with Indonesia, the withholding tax referred to in paragraph (1) is only conducted if pursuant to the applicable Tax Treaty, the taxing right lies with Indonesia.
(3) The estimated net income referred to in paragraph (1) amounts to 25% (twenty-five per cent) of the selling price, thereby, Article 26 Income Tax amounts to 20% x 25% or 5% (five per cent) of the selling price.
(4) The payment of Income Tax referred to in paragraph (1) is final.

Article 239

(1) Income from domestic sales of shares received or accrued by non-resident Taxpayers referred to in Article 238 paragraph (1), is subject to withholding tax by the buyer.
(2) The buyer as the withholding agent prepares the withholding receipt and submits it to the withholdee.
(3) The buyer as the withholding agent referred to in paragraph (2) is required to remit Article 26 Income Tax payable no later than the 15th (fifteenth) of the following month after the month the tax becomes payable through the Collecting Agent and files it to the Director General of Taxes no later than 20 (twenty) days after the Taxable Period ends using Unified Periodic Income Tax Returns.
(4) In the event that the buyer referred to in paragraph (1) is a non-resident Taxpayer, the Company is appointed as the collection agent.
(5) The Company as the collection agent referred to in paragraph (4) prepares the collection receipt and submits it to the party subject to the collection.
(6) The Company as the collection agent referred to in paragraph (4) is required to remit the collected Article 26 Income Tax no later than the 15th (fifteenth) of the following month after the month the tax becomes payable through the Collecting Agent and file it to the Director General of Taxes no later than 20 (twenty) days after the Taxable Period ends using Unified Periodic Income Tax Returns.

Article 240

(1) A Company only records the deed of transfer of the right to shares from the sale of shares referred to in Article 239 paragraph (1) if the non-resident Taxpayer has proven that Income Tax referred to in Article 238 paragraph (1) payable has been paid in full by submitting a copy of the Withholding receipt or Income Tax collection receipt.

(2) Withholding agents or collection agents that do not fulfil the provisions referred to in Article 239 are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Section Eight
Article 26 Withholding Tax on Income in the Form of Insurance Premiums and Reinsurance Premiums Paid to Insurance Companies Overseas

Article 241

(1) The payment of insurance premium and reinsurance premium to an Insurance Company overseas is subject to Article 26 Withholding Tax of 20% (twenty per cent) of the estimated net income.
(2) The amount of the estimated net income referred to in paragraph (1) is as follows:
    a. for the premium paid by the insured to the Insurance Company overseas either directly or through a broker, amounting to 50% (fifty per cent) of the amount of the paid premium;
    b. for the premium paid by the Insurance Company domiciled in Indonesia to the Insurance Company overseas either directly or through a broker, amounting to 10% (ten per cent) of the amount of the paid premium;
    c. for the premium paid by the reinsurance company domiciled in Indonesia to the Insurance Company overseas either directly or through a broker, amounting to 5% (five per cent) of the amount of the paid premium.

Article 242

Article 26 Withholding Tax referred to in Article 241 paragraph (1) is conducted by:
a. the insured, in the event that the premium is paid as referred to in Article 241 paragraph (2) subparagraph a;
b. the Insurance Company domiciled in Indonesia, in the event that the premium is paid as referred to in Article 241 paragraph (2) subparagraph b;
c. the reinsurance company domiciled in Indonesia, in the event that the premium is paid as referred to in Article 241 paragraph (2) subparagraph c.

Article 243

(1) Article 26 Income Tax on income referred to in Article 241 payable at the end of the month the premium is paid or at the end of the month the insurance premium is payable.
(2) The withholding agent is required to withhold and prepare the Article 26 Withholding Tax receipt.
(3) The withholding agent referred to in paragraph (2) submits the Article 26 Withholding Tax receipt to the withholdee.

(4) The withholding agent referred to in paragraph (2) is required to remit Article 26 Income Tax no later than 15 (fifteen) days after the time the tax becomes payable using a Tax Payment Slip or administrative means equivalent to the Tax Payment Slip.
(5) The withholding agent referred to in paragraph (2) is required to file Article 26 Income Tax to the Director General of Taxes no later than 20 (twenty) days after the time the tax becomes payable using Unified Periodic Income Tax Returns.
(6) The withholding agents that do not fulfil the provisions referred to in paragraph (2), paragraph (4) and paragraph (5) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Section Nine
The Implementation of Income Tax Collection on Income from Share Sale Transactions on the Stock Exchange

Article 244
Income received or accrued by individuals or Entities from a share sale transaction on the stock exchange is subject to final Income Tax of 0.1% (zero point one per cent) of the gross amount of the value of the share sale transaction.

Article 245
(1) The Income Tax imposition referred to in Article 244 is conducted by withholding tax by the stock exchange operator through the securities intermediary at the time the share sale transaction is settled.
(2) The stock exchange operator through the securities intermediary as the withholding agent is required to prepare the withholding receipt for the Withholding Tax referred to in paragraph (1) and submit the withholding receipt to the withholdee.
(3) The withholding receipt referred to in paragraph (2) may be in the form of documents equivalent to the withholding receipt.
(4) The preparation of documents equivalent to the withholding receipt referred to in paragraph (3) shall comply with the provisions on the format and procedures for the preparation of the Withholding Tax receipt.
(5) The stock exchange operator is required to remit Income Tax referred to in paragraph (1) to the State Treasury no later than the 15th (fifteenth) of the following month after the Taxable Period ends.
(6) The stock exchange operator is required to file Withholding Tax and Income Tax remittance referred to in paragraph (1) and paragraph (5) through Unified Periodic Income Tax Returns no later than 20 (twenty) days after the Taxable Period ends.
(7) Unified Periodic Income Tax Returns referred to in paragraph (6) are prepared based on data and information in the confirmation of transactions that must be submitted by the securities intermediary to the stock exchange operator.
(8) Stock exchange operators that do not fulfil the provisions referred to in paragraph (2), paragraph (5) and paragraph (6) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 246

(1) Holders of founders stock are subject to additional final Income Tax of 0.5% (zero point five per cent) of the value of shares.
(2) The founders stock referred to in paragraph (1) is shares held by the founders at the time of the Initial Public Offering.
(3) Included in the definition of founders stock referred to in paragraph (2) are:
    a. shares acquired by the founders from the capitalisation of share premium issued after the Initial Public Offering; and
    b. shares from the split of founders stock.
(4) Not included in the definition of founders stock referred to in paragraph (2) are:
    a. shares acquired by the founders from the distribution of Dividends in the form of shares;
    b. shares acquired by the founders after the initial public offering from the exercise of pre-emptive rights, warrants, convertible bonds and other convertible securities; and
    c. shares acquired by the founders of mutual fund companies.
(5) The value of the shares referred to in paragraph (1) is:
    a. the value of shares at the close of the stock exchange at the end of 1996 or on 30 December 1996, if the shares were traded on the stock exchange in 1996 or earlier; or
    b. the value of the company shares at the time of the Initial Public Offering, if the company shares were traded on the stock exchange on or after 1 January 1997.

Article 247

(1) The founders referred to in Article 246 paragraph (2) are individuals or Entities whose names are recorded in the list of shareholders of a limited company or listed in the articles of association of a limited company before the registration statement is submitted to the Financial Services Authority for the initial public offering to be effective.
(2) Included in the definition of the founders are individuals or Entities receiving the transfer of shares from the founders referred to in paragraph (1) due to:
    a. inheritance;
    b. grants that fulfil the requirements under Article 4 paragraph (3) subparagraph a number 2 of the Income Tax Law; and
    c. other manners not subject to Income Tax at the time of the transfer.

Article 248

(1) The additional Income Tax of 0.5% (zero point five per cent) referred to in Article 246 paragraph (1) is imposed on the holders of founders stock and becomes payable at the time the company's shares are traded on the stock exchange.
(2) To the imposition of additional Income Tax referred to in paragraph (1), the following provisions shall apply:

a. the additional Income Tax is imposed through collection by the issuer;
b. the collection is conducted no later than 1 (one) month after the time the additional Income Tax referred to in paragraph (1) becomes payable; and
c. the issuer issues and submits the collection receipt to holders of the founders stock.

(3) The additional Income Tax referred to in paragraph (1) must be:
a. remitted to the State Treasury using the Taxpayer Identification Number of the issuer no later than 1 (one) month after the time the additional Income Tax is payable; and
b. filed to the Director General of Taxes through Unified Periodic Income Tax Returns, no later than 20 (twenty) days after the Taxable Period ends.

(4) The additional Income Tax referred to in paragraph (1) cannot be taken into account as expenses for the issuer.

(5) The issuer that has remitted Income Tax to the State Treasury referred to in paragraph (3) subparagraph a but does not fulfil the provisions referred to in paragraph (3) subparagraph b is subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 249

For the additional Income Tax referred to in Article 246 paragraph (1) collected not in accordance with the provisions referred to in Article 248 paragraph (1) and paragraph (3) subparagraph a, the income from founders stock sale transactions shall be subject to Income Tax according to the rates stipulated under Article 17 of the Income Tax Law.

Section Ten
Procedures for the Remittance and Filing of State Revenues from Upstream Oil and/or Gas Business Activities and the Calculation of Income Tax for the Payment of Oil and/or Gas Income Tax in the Form of Oil and/or Gas Volume

Article 250

(1) State revenues from upstream oil and/or gas business activities are revenues sourced from Cooperation Contracts of oil and/or gas mining Working Areas, which consist of:
a. the state's share; and
b. oil and/or gas Income Tax.

(2) Oil referred to in paragraph (1) is the result of a natural process in the form of hydrocarbons that, under atmospheric pressure and temperature conditions are in the form of liquid or solid phases, including asphalt, mineral wax or ozokerite and bitumen obtained from the mining process, but excluding coal or other solid hydrocarbon deposits obtained from activities not related to oil and gas business.

(3) Gas referred to in paragraph (1) is the result of a natural process in the form of hydrocarbons that, under atmospheric pressure and temperature

conditions, are in the form of a gas phase obtained from the mining process of oil and natural gas.

Article 251

(1) The state's share referred to in Article 250 paragraph (1) subparagraph a includes Lifting constituting the state's right originating from total Lifting of oil and/or gas based on the Cooperation Contract.
(2) The total Lifting referred to in paragraph (1) is the amount of all oil and/or gas consisting of the amount of Lifting from a Working Area which is the state's right and the Contractor's right.
(3) Lifting constituting the state's right referred to in paragraph (1) and paragraph (2) includes the amount of oil and/or gas constituting the share of the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency stipulated under the Cooperation Contract.

Article 252

(1) The Lifting of oil and/or gas from a Working Area must be sold and/or delivered pursuant to statutory laws and regulations and/or the Cooperation Contract.
(2) The sales and/or delivery of oil and/or gas referred to in paragraph (1) consist of:
    a. Lifting constituting the state's right;
    b. Lifting constituting the Contractor's right; or
    c. Lifting constituting the state's right and Lifting constituting the Contractor's right (Joint Lifting).
(3) Lifting constituting the state's and/or the Contractor's right referred to in paragraph (2) is temporary Lifting.
(4) The Contractor and the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency shall perform the final calculation of Lifting constituting the state's right and the Contractor's right from each Working Area at the end of the year.
(5) The results of the final calculation of Lifting constituting the state's right and the Contractor's right referred to in paragraph (4) may be in the form of the amount of Overlifting or Underlifting.

Article 253

(1) Income Tax that must be paid and filed by a Contractor consists of:
    a. tax instalments in the current year;
    b. Corporate Income Tax payable at the end of the year;
    c. Income Tax on taxable income after being deducted by Corporate Income Tax that is paid monthly; and/or
    d. Income Tax on taxable income after being deducted by Corporate Income Tax that is paid annually.
(2) Contractors that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 254

(1) In the event that the government requires oil and/or gas to fulfil domestic needs, the Income Tax payment referred to in Article 253 paragraph (1) subparagraph a and subparagraph c may be in the form of oil and/or gas volume of the Contractor's share.
(2) The determination of the oil and/or gas needs to fulfil domestic needs used as the payment of Income Tax referred to in paragraph (1) is coordinated by the minister who administers governmental affairs in the field of oil and gas business activities and the Minister.

Article 255

(1) The amount of Income Tax in the form of oil volume from the Contractor's share referred to in Article 254 paragraph (1) which must be supplied to the government is calculated using the Indonesian Crude Price in the month Income Tax is payable.
(2) The amount of Income Tax in the form of gas volume from the Contractor's share referred to in Article 254 paragraph (1) which must be supplied to the government is calculated using the Contractor's weighted average sales price in the month Income Tax becomes payable.
(3) The gas price used to calculate the amount of Income Tax referred to in paragraph (2) is stipulated by the Minister.

Article 256

(1) Proceeds from sales and/or delivery of Lifting constituting the state's right referred to in Article 252 paragraph (2) subparagraph a and subparagraph c, are remitted as the state's share in the full amount according to the Cooperation Contract and/or pursuant to statutory laws and regulations, without the reduction of administrative expenses.
(2) Proceeds from sales and/or delivery of Lifting referred to in paragraph (1) are recorded by the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency in reports prepared per Working Area for each month based on the value of invoices or documents related to sales and/or delivery of Lifting constituting the state's right.
(3) The reports referred to in paragraph (2) are submitted to the Directorate General of Budget and the Directorate General of Taxes no later than the end of the following month.
(4) In the event that the results of the final calculation of Lifting constituting the state's right and the Contractor's right at the end of the year referred to in Article 252 paragraph (5) are in the form of the Contractor's Overlifting, the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency collects the Overlifting from the Contractor.
(5) In the event that the results of the final calculation of Lifting constituting the state's right and the Contractor's right at the end of the year referred to in Article 252 paragraph (5) are in the form of the Contractor's Underlifting, the Special Task Force for Upstream Oil and Gas Business or

the Aceh Oil and Gas Management Agency collects the Underlifting from the Government.

(6) The provisions on procedures for the remittance and/or payment of the Contractor's Overlifting and the Contractor's Underlifting referred to in paragraph (4) and paragraph (5) are separately stipulated in a Ministerial Regulation.

Article 257

The Income Tax payment referred to in Article 253 paragraph (1) is performed in cash to the State Treasury through a Foreign Exchange Tax Payment Bank pursuant to statutory provisions.

Article 258

(1) In the event that Income Tax is paid in the form of oil and/or gas volume as referred to in Article 254 paragraph (1), the payment concerned is performed through supplies of oil and/or gas volume from a Contractor to the government represented by the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency.

(2) Income Tax payment in the form of oil and/or gas volume referred to in paragraph (1) must be performed no later than 15th (fifteenth) of the following month after the Taxable Period ends.

(3) Contractors that do not fulfil the provisions referred to in paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 259

(1) Income Tax payment performed in the form of oil and/or gas volume referred to in Article 258 paragraph (1), is outlined in the official report of handover and is signed by the Contractor and the government represented by the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency.

(2) The official report of handover referred to in paragraph (1) must be submitted by the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency to the Ministry of Finance, in this case, the Directorate General of Taxes and the Directorate General of Budget no later than 5 (five) business days after the official report of handover is signed.

(3) The date of the official report of handover referred to in paragraph (1) is declared as the proof of the date of payment of Income Tax in the form of oil and/or gas volume.

(4) At the time of the supply of oil and/or gas volume from the Contractor to the government represented by the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency referred to in Article 258 paragraph (1), the Contractor must submit a Tax Payment Slip for Income Tax payment in the form of oil and/or gas volume.

Article 260

(1) In the event that oil and/or gas originating from Income Tax payment in the form of oil and/or gas volume referred to in Article 258 paragraph (1) is sold, the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency must report the proceeds from the sale to the Ministry of Finance, in this case, the Directorate General of Taxes.

(2) The Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency is requested to remit the proceeds of the sale of oil and/or gas referred to in paragraph (1) to the State Treasury through a Foreign Exchange Tax Payment Bank.

Article 261

(1) The Income Tax payment in cash referred to in Article 257, is performed using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip pursuant to statutory provisions.

(2) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in paragraph (1) is recognised as a valid payment receipt in the event that it has obtained a State Revenue Transaction Number and Bank Transaction Number.

(3) The date recognised as the date of payment of Income Tax by the Contractor is the date of payment stated in the State Revenue Receipt.

(4) In the event that Income Tax payment is performed in the form of oil and/or gas volume as referred to in Article 258 paragraph (1), the following provisions on the preparation and completion of the Tax Payment Slip shall apply:
   a. the Tax Payment Slip is prepared based on the official report of handover referred to in Article 259 paragraph (1) and paragraph (2); and
   b. the Tax Payment Slip must be attached with the official report of handover referred to in Article 259 paragraph (1).

(5) The Tax Payment Slip referred to in paragraph (4) is recognised as a valid payment receipt in the event that it has been validated by appointed officials of the ministry that administers governmental affairs in the field of oil and gas business activities or the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency.

(6) The validation referred to in paragraph (5) is conducted based on the official report of handover stipulated under Article 259 paragraph (1).

Article 262

(1) The Contractor acting as the Operator or Partner in a Working Area, in implementing the Cooperation Contract, is required to prepare the report on state revenues from upstream oil and/or gas business activities in the Working Area concerned.

(2) The report on state revenues referred to in paragraph (1) is submitted monthly.

(3) The report on state revenues referred to in paragraph (1) contains information on the state's share referred to in Article 251 and Income Tax referred to in Article 253
(4) In the event that the Contractor acts as a Partner, the report on state revenues referred to in paragraph (1) is prepared based on data on upstream oil and/or gas business activities from the Operator.

Article 263

(1) The report on state revenues referred to in Article 262 must be submitted by the Contractor acting as the Operator or Partner to:
    a. the Director General of Budget, in this case, the Director of Natural Resource and Separated Asset Non-Tax State Revenues;
    b. the Director General of Taxes; and
    c. the Head of the Special Task Force for Upstream Oil and Gas Business or the Aceh Oil and Gas Management Agency.
(2) In the event that Income Tax payment is performed in the form of oil and/or gas volume, the report on state revenues referred to in paragraph (1) is attached with the official report of handover.

Article 264

(1) The report on state revenues referred to in Article 262 must be submitted no later than the 20th (twentieth) of the following month.
(2) In the event that the submission deadline for the report on state revenues referred to in paragraph (1) falls on a holiday, the report is submitted on the following business day.
(3) The holidays referred to in paragraph (2) are Saturdays, Sundays, national holidays, days off for the organisation of general elections or days determined as national collective leave.
(4) The report on state revenues referred to in paragraph (1) submitted to the Director General of Taxes functions as the Periodic Income Tax Return.
(5) Contractors that do not or are late in submitting the report on state revenues referred to in paragraph (1) are subject to penalties pursuant to statutory provisions in the field of taxation.

Section Eleven
Procedures for the Application and Settlement of Value Added Tax Refunds for Baggage of Individuals Holding Foreign Passports

Article 265

(1) Value Added Tax that has been paid on Baggage may be requested for a refund by Foreign Tourists.
(2) The refundable Value Added Tax for the Foreign Tourists referred to in paragraph (1) must fulfil the following requirements:
    a. the value of Value Added Tax is a minimum of IDR500,000.00 (five hundred thousand rupiah); and
    b. the purchase of Baggage is conducted within a period of 1 (one) month before departure outside the Customs Territory.

(3) The value of Value Added Tax referred to in paragraph (2) subparagraph a is the value of Value Added Tax listed in 1 (one) Tax Invoice or the result of the consolidation of more than 1 (one) Tax Invoice with the value of Value Added Tax listed in each Tax Invoice of a minimum of IDR50,000.00 (fifty thousand rupiah).
(4) The period of 1 (one) month referred to in paragraph (2) subparagraph b is 30 (thirty) calendar days.
(5) The request for Value Added Tax refund referred to in paragraph (1) may only be submitted by the Foreign Tourist concerned.
(6) The request for Value Added Tax refund of the Baggage referred to in paragraph (1) is submitted 1 (one) time for 1 (one) period of visit to Indonesia.
(7) The request for Value Added Tax refund referred to in paragraph (1) is submitted at the time the Foreign Tourist leaves Indonesia and submitted by the Foreign Tourist to the Director General of Taxes through the Office of the Directorate General of Taxes at the airport.
(8) The Office of the Directorate General of Taxes referred to in paragraph (7) is the Airport Value Added Tax Refund Implementing Unit.
(9) Foreign Tourists referred to in paragraph (1) are Foreign Tourists who are not Indonesian Citizens or not permanent residents of Indonesia, residing or are in Indonesia for no more than 60 (sixty) days from the date of arrival.

Article 266

Foreign Tourists who desire Value Added Tax refunds of purchases of Baggage must notify and show their Foreign Passport to the Retail Outlet Taxable Person.

Article 267

The airport referred to in Article 265 paragraph (7) is the airport of departure for Foreign Tourists determined by the Minister.

Article 268

(1) The Retail Outlet Taxable Person referred to in Article 266 must register as a Taxable Person participating in the Value Added Tax refunds for Foreign Tourists scheme.
(2) The Retail Outlet Taxable Person referred to in paragraph (1) is determined by the Director General of Taxes.
(3) The Retail Outlet Taxable Person referred to in paragraph (2) supplying Baggage to Foreign Tourists must prepare a Tax Invoice.
(4) The Tax Invoice for purchases of Baggage referred to in paragraph (3) must fulfil the provisions stipulated under Article 13 paragraph (5) of the Value Added Tax Law.
(5) Procedures for the preparation, correction or replacement and/or the cancellation of the Tax Invoice referred to in paragraph (3) are implemented pursuant to statutory provisions stipulating Tax Invoices.

Article 269

(1) Retail Outlet Taxable Persons are required to file Periodic Value Added Tax Returns for all supplies of Taxable Goods they conduct, including supplies of Baggage to Foreign Tourists, pursuant to statutory provisions in the field of taxation.
(2) Retail Outlet Taxable Persons that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 270

(1) A Foreign Tourist submits a request for Value Added Tax refunds referred to in Article 265 by bringing Baggage and showing documents in the form of:
    a. the passport;
    b. the boarding pass for the departure of the Foreign Tourist outside the Customs Territory; and
    c. the Tax Invoice referred to in Article 265 paragraph (3).
(2) The Inspection Counter officers examine the fulfilment of the provisions referred to in Article 265 paragraph (2), paragraph (3), paragraph (7) and paragraph (9).
(3) Based on the examination referred to in paragraph (2), the Inspection Counter officers may:
    a. match the type and quantity of Baggage with the Tax Invoice, in the event that the request for the refund fulfils the provisions referred to in Article 265 paragraph (2), paragraph (3) and paragraph (7); or
    b. reject the request for the Value Added Tax refund, in the event that the request for the refund does not fulfil the provisions referred to in Article 265 paragraph (2), paragraph (3) and/or paragraph (7).
(4) The results of the matching referred to in paragraph (3) subparagraph a include:
    a. full conformity;
    b. partial conformity; or
    c. full non-conformity.
(5) Based on the results of the matching referred to in paragraph (4) subparagraph a or subparagraph b, the Inspection Counter officers approve the request for the Value Added Tax refund in full or in part.
(6) Based on the results of the matching referred to in paragraph (4) subparagraph c, the Inspection Counter officers reject the request for the Value Added Tax refund.

Article 271

(1) Based on the approval of the request for the Value Added Tax refund referred to in Article 270 paragraph (5), the Value Added Tax refund is conducted:
    a. in cash in rupiah, in the event that Value Added Tax has a value of less than or equal to IDR5,000,000.00 (five million rupiah); or

b. by transfer through the issuance of a Disbursement of Refund Claim in rupiah to the Foreign Tourist's account, in the event that Value Added Tax has a value of more than IDR5,000,000.00 (five million rupiah).

(2) To issue the Disbursement of Refund Claims to the Foreign Tourist's account referred to in paragraph (1) subparagraph b, the Inspection Counter officers request the account number and name of the beneficiary bank from the Foreign Tourist to be listed in the Value Added Tax Refund Request Form.

(3) All costs related to the transfer of the Value Added Tax refund to the Foreign Tourist's account referred to in paragraph (2) shall be charged to the Foreign Tourist by reducing the amount of the Value Added Tax refund concerned.

(4) In the event that the Foreign Tourist referred to in paragraph (2):
a. does not provide the account number and name of the beneficiary bank; and/or
b. desires a cash refund in rupiah,
the Value Added Tax refund is conducted in cash for a maximum of IDR5,000,000.00 (five million rupiah) and the discrepancy is not refunded to the Foreign Tourist.

(5) In the event of Value Added Tax refund through the issuance of a Disbursement of Refund Claim to the Foreign Tourist's account referred to in paragraph (1) subparagraph b, transfer failure occurs resulting in the Value Added Tax refund not being received in the Foreign Tourist's account, the Value Added Tax refund concerned is settled pursuant to statutory provisions on procedures for payments in the context of implementation of the State Budget.

Article 272

(1) In the event that the Inspection Counter officers approve the Value Added Tax refund that has a value of less than or equal to IDR5,000,000.00 (five million rupiah) and the refund payment is performed in cash as referred to in Article 271 paragraph (1) subparagraph a:
a. the Tax Refund Petty Cash Custodian at the Payment Counter prints and signs the official report of approval of Value Added Tax refund in cash;
b. the Tax Refund Petty Cash Custodian at the Payment Counter pays the Foreign Tourist in cash in rupiah;
c. the Inspection Counter officers prepare and print the accountability report and nominative list at the end of each day;
d. the Inspection Counter officers and Tax Refund Petty Cash Custodian at the Payment Counter sign the accountability report, and the nominative list referred to in subparagraph c; and
e. the Tax Refund Petty Cash Custodian at the Payment Counter delivers the accountability report, nominative list and official report of approval of Value Added Tax refunds to the Tax Office.

(2) In the event that the Inspection Counter officers approve the Value Added Tax refund that has a value of more than IDR5,000,000.00 (five million rupiah) and the refund is paid by transfer through the issuance of the Disbursement of Refund Claim to the Foreign Tourist's account referred to in Article 271 paragraph (1) subparagraph b:
   a. the Inspection Counter officers deliver the Value Added Tax Refund Request Form to the Tax Office designated as the Value Added Tax refund by transfer processing unit; and
   b. the Tax Office referred to in subparagraph a settles the Value Added Tax refund no later than 1 (one) month starting from the date the request for the refund is received.

(3) Based on the request for the refund referred to in paragraph (2), the Head of the Tax Office referred to in paragraph (2) subparagraph a, issues a Notice of Tax Overpayment Assessment no later than 3 (three) business days from the receipt of the Value Added Tax Refund Request Form from the Airport Value Added Tax Refund Implementing Unit.

(4) After issuing the Notice of Tax Overpayment Assessment referred to in paragraph (3), the Head of the Tax Office referred to in paragraph (2) subparagraph a prepares a Tax Refund Calculation Memo.

(5) Based on the Value Added Tax Refund Request Form that has been approved, the Head of the Tax Office referred to in paragraph (2) subparagraph a, issues the Tax Refund Decision Letter no later than 3 (three) business days from the time the Notice of Tax Overpayment Assessment is issued.

(6) Based on the Tax Refund Decision Letter, the Head of the Tax Office referred to in paragraph (2) subparagraph a on behalf of the Minister issues the Disbursement of Refund Claim pursuant to statutory provisions on procedures for the calculation and tax refunds, by taking into account the provisions stipulated under paragraph (2) subparagraph b.

(7) The Disbursement of Refund Claim, Tax Refund Decision Letter and Computer Data Archives are submitted to the State Treasury Office electronically or in person by the appointed officers.

(8) Based on the Disbursement of Refund Claim referred to in paragraph (7), the Head of the State Treasury Office issues the Fund Disbursement Order pursuant to statutory laws and regulations in the field of treasury.

(9) The Tax Refund Calculation Memo referred to in paragraph (4) and the Tax Refund Decision Letter referred to in paragraph (5) shall be prepared as per the sample format listed in the statutory provisions on procedures for the calculation and tax refunds.

Article 273

(1) In the context of the provision of the Tax Refund Petty Cash referred to in Article 271 paragraph (1) subparagraph a, the Head of the Tax Office issues the Payment Order for Tax Refund Petty Cash based on the estimated expenditure for the Value Added Tax refunds pursuant to statutory provisions on procedures for payment in the context of implementation of the State Budget.

(2) The amount of Tax Refund Petty Cash is a maximum of 1/12 (one twelfth) of the total realisation of Value Added Tax refunds for the previous year paid in cash using Tax Refund Petty Cash at each Tax Office, with the amount of Tax Refund Petty Cash of a maximum of IDR500,000,000.00 (five hundred million rupiah).
(3) In the event that there is no realisation of Value Added Tax refunds for the previous year which are paid in cash referred to in paragraph (2), the amount of the Tax Refund Petty Cash is the amount of the planned needs for 1 (one) month for a maximum of IDR500,000,000.00 (five hundred million rupiah).

Article 274

The Tax Refund Petty Cash Custodian reimburses Tax Refund Petty Cash using the Payment Order for Tax Refund Petty Cash Reimbursement after Tax Refund Petty Cash is used by a minimum of 50% (fifty per cent).

Article 275

(1) In the event that the remaining Tax Refund Petty Cash at the Expenditure Treasurer is insufficient to pay Value Added Tax refunds in cash, the Head of the Tax Office may apply for the provision of Additional Tax Refund Petty Cash to the Head of the State Treasury Office using a Payment Order for Additional Tax Refund Petty Cash.
(2) The Additional Tax Refund Petty Cash must be accounted for in a period of 1 (one) month from the time the Fund Disbursement Order for the Additional Tax Refund Petty Cash is issued by the State Treasury Office.
(3) The accountability of the Additional Tax Refund Petty Cash referred to in paragraph (2) may be conducted in stages.
(4) The remaining Additional Tax Refund Petty Cash that is not used up must be remitted to the State Treasury no later than 2 (two) business days after the deadline referred to in paragraph (2).

Article 276

(1) Procedures for the issuance of Payment Order for Tax Refund Petty Cash, Payment Order for Tax Refund Petty Cash Reimbursement and Payment Order for Additional Tax Refund Petty Cash are implemented pursuant to statutory provisions on procedures for the payment in the context of the implementation of the State Budget.
(2) Based on the Payment Order for Tax Refund Petty Cash, the Payment Order for Tax Refund Petty Cash Reimbursement and the Payment Order for Additional Tax Refund Petty Cash referred to in paragraph (1), the Head of the State Treasury Office issues the Fund Disbursement Order pursuant to statutory provisions on procedures for the payment in the context of the implementation of the State Budget.
(3) The Head of the Tax Office re-remits the remaining Refund Petty Cash that is still under his management, at the end of each fiscal year.
(4) In the event that remittance cannot be conducted until the fiscal year ends, the remaining Refund Petty Cash that is still under the management of the

Tax Office is set off against the granting of Tax Refund Petty Cash in the following year.

(5) For the realisation of the Value Added Tax refunds in cash performed until 31 December, the Head of the Tax Office accounts for Petty Cash or Additional Tax Refund Petty Cash funds according to the deadline stipulated under statutory provisions on procedures for the implementation of state revenues and expenditures at the end of the fiscal year.

Article 277

The Head of the Tax Office as the Proxy of Budget User must submit the accountability for the management of Tax Refund Petty Cash in the form of the payment administration accountability report on Value Added Tax refunds to Foreign Tourists which constitutes an integral part of financial statements of the working unit concerned.

Section Twelve
Thresholds of Activities and Types of Taxable Services Whose Exports Are Subject to Value Added Tax

Article 278

(1) Value Added Tax is imposed on Exports of Taxable Services by Taxable Persons.
(2) Value Added Tax payable referred to in paragraph (1) is calculated by multiplying the Value Added Tax rate and the tax base.
(3) The Value Added Tax rate referred to in paragraph (2) is 0% (zero per cent).
(4) The tax base referred to in paragraph (2) is the Reimbursement.

Article 279

(1) Export of Taxable Services activities are service activities within the Customs Territory resulting in a goods, facility, concession or right being available to be utilised outside the Customs Territory.
(2) The service activities referred to in paragraph (1) are:
    a. activities attached to the movable property released to be utilised outside the Customs Territory;
    b. activities attached to the immovable property located outside the Customs Territory; or
    c. activities other than activities referred to in subparagraph a and subparagraph b whose results are supplied to be utilised outside the Customs Territory by:
        1. in-person or non-in-person submission, including by post and electronic channels; or
        2. in the form of the provision of the right to use (access) outside the Customs Territory,

    based on the request from the Recipient of Export of Taxable Services.

Article 280

(1) The types of Taxable Services in the form of service activities attached to the movable property released to be utilised outside the Customs Territory referred to in Article 279 paragraph (2) subparagraph a include:
   a. toll manufacturing services;
   b. repair and maintenance services; and
   c. freight forwarding services related to goods for export purposes.

(2) The types of Taxable Services in the form of service activities attached to the immovable property located outside the Customs Territory referred to in Article 279 paragraph (2) subparagraph b are construction consulting services which include the review, planning and construction design related to buildings or building plans that are located outside the Customs Territory.

(3) The types of Taxable Services in the form of service activities whose results are supplied to be utilised outside the Customs Territory referred to in Article 279 paragraph (2) subparagraph c include:
   a. technology and information services;
   b. research and development services;
   c. means of transport rental services in the form of aircraft and/or ship rental for international aviation or shipping activities;
   d. business and management consulting services, legal consulting services, architectural and interior design consulting services, human resources consulting services, engineering consulting services, marketing services, accounting or Bookkeeping services, financial statement audit services and tax services;
   e. trade services in the form of intermediary services of finding sellers of goods in the Customs Territory for export purposes; and
   f. interconnection, operation of satellite and/or communications/data connectivity services.

Article 281

(1) The toll manufacturing services referred to in Article 280 paragraph (1) subparagraph a fulfil the following provisions:
   a. the specifications and raw materials and/or semi-finished materials are provided by the Recipient of Export of Taxable Services;
   b. the raw materials and/or semi-finished materials referred to in subparagraph a will be processed to produce Taxable Goods;
   c. the ownership of produced Taxable Goods is with the Recipient of Export of Taxable Services; and
   d. the contract manufacturing service entrepreneurs deliver Taxable Goods which are the product of their work outside the Customs Territory using goods export mechanisms.

(2) The technology and information services referred to in Article 280 paragraph (3) subparagraph a include:
   a. computer system analysis services, including problem-solving that requires information technology support;

b. computer system design services, including the required hardware, software and/or computer network;
c. computer system and/or website development services using programming languages, including application development services;
d. information technology security (IT security) services, including protection of information when information is processed, transmitted and/or stored;
e. contact centre services, including providing responses and/or follow-up to inquiries and/or statements submitted to the contact centre;
f. technical support services, including client problem-solving services in the implementation, use, data processing and configuration of hardware, software and/or computer networks;
g. cloud computing and web hosting services, including data hosting or data storage insofar as the server is located within the Customs Territory and the recipient of the data hosting or data storage services is a cloud computing or web hosting service provider; and
h. content services using information technology assistance, including the development of games, animation and graphic design.

(3) The interconnection, satellite operation and/or communication/data connectivity services referred to in Article 280 paragraph (3) subparagraph f include:
a. international call and/or short message interconnection services provided by domestic telecommunications operators to foreign telecommunications operators;
b. satellite transmitter and responder (transponder) services performed by domestic satellite operators to service recipients overseas, insofar as the earth station used by the service recipients is outside the Customs Territory;
c. satellite control services performed by domestic satellite operators to foreign satellite operators, insofar as the controlling earth station used by domestic satellite operators is located within the Customs Territory; and/or
d. global internet connection services through public or private networks performed by domestic network operators to service recipients overseas.

Article 282

(1) Exports of Taxable Services are subject to Value Added Tax referred to in Article 278 insofar as fulfilling the following provisions:
a. based on a written contract or agreement between the Taxable Person and the Recipient of Export of Taxable Services which clearly lists:
1. the types;

2. details of activities produced within the Customs Territory to be utilised outside the Customs Territory by Recipient of Export of Taxable Services; and
3. the value of the supply,

of the Taxable Services referred to in Article 280 paragraph (1), paragraph (2) and/or paragraph (3); and

b. there is payment accompanied by a valid payment receipt from the Recipient of Export of Taxable Services to the Taxable Person in connection with the Export of Taxable Services referred to in subparagraph a.

(2) The service activities referred to in Article 279 that do not fulfil the provisions referred to in paragraph (1) are deemed supplies of Taxable Services within the Customs Territory subject to Value Added Tax pursuant to statutory provisions in the field of Value Added Tax.

(3) The Taxable Services referred to in Article 280 paragraph (1), paragraph (2) and paragraph (3) that are produced and utilised outside the Customs Territory are not subject to Value Added Tax.

Article 283

(1) The time of supply for Value Added Tax for Exports of Taxable Services is at the time of the Export of Taxable Services.

(2) The time of the Export of Taxable Services referred to in paragraph (1) is the time the Reimbursement for the exported services is recorded or recognised as a receivable or income.

Article 284

(1) A Taxable Person conducting an Export of Taxable Services is required to prepare a Tax Invoice at the time of the Export of Taxable Services.

(2) The Tax Invoice referred to in paragraph (1) uses certain documents equivalent to the Tax Invoice.

(3) The certain documents referred to in paragraph (2) are in the form of the export declaration for the intangible Taxable Goods or Taxable Services attached with an invoice which constitutes an integral part of the export declaration for the intangible Taxable Goods or Taxable Services.

(4) For export of Taxable Goods activities resulting from the implementation of contract manufacturing services referred to in Article 4 paragraph (1) subparagraph a, in addition to being required to prepare a Tax Invoice as referred to in paragraph (1) and paragraph (2), the Taxable Person is required to prepare the export declaration pursuant to statutory provisions in the customs sector.

(5) The export declaration for the intangible Taxable Goods or Taxable Services referred to in paragraph (3) must be prepared through the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes.

(6) Taxable Persons that do not fulfil the provisions referred to in paragraph (1), paragraph (4) and paragraph (5) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 285

(1) Export of Taxable Services activities referred to in Article 279 are filed as Exports of Taxable Services in Periodic Value Added Tax Returns.

(2) In respect of exports of contract manufacturing service activities referred to in Article 4 paragraph (1) subparagraph a, in addition to filing the Exports of Taxable Services referred to in paragraph (1), the Taxable Person files exports of Taxable Goods resulting from the implementation of contract manufacturing service activities in Periodic Value Added Tax Returns.

(3) Value Added Tax on:
   a. acquisitions of Taxable Goods;
   b. acquisitions of Taxable Services;
   c. the utilisation of intangible Taxable Goods from outside the Customs Territory;
   d. the utilisation of Taxable Services from outside the Customs Territory; and/or
   e. imports of Taxable Goods,

   directly related to Export of Taxable Services activities referred to in paragraph (1) and exports of Taxable Goods referred to in paragraph (2) constitutes creditable Input VAT pursuant to statutory provisions in the field of Value Added Tax.

Section Thirteen
Procedures for the Deduction of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on Returned Taxable Goods and Value Added Tax on Cancelled Taxable Services

Article 286

(1) In the event that the supplied Taxable Goods are returned in part or in full by the buyer of Taxable Goods, Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on the returned Taxable Goods may reduce Output VAT and Sales Tax on Luxury Goods payable to the seller Taxable Person and reduce:
   a. Input VAT of the buyer Taxable Person, in the event that Input VAT on the returned Taxable Goods has been credited;
   b. costs or assets for the buyer Taxable Person, in the event that the tax on the returned Taxable Goods is not credited and has been charged to expenses or has been added (capitalised) to the acquisition cost of the assets; or
   c. costs or assets for the buyer not constituting a Taxable Person in the event that Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on the returned Taxable Goods have been charged to expenses or have been added (capitalised) to the acquisition cost of the assets.

(2) The buyer referred to in paragraph (1) is an individual or Entity that receives or should receive a supply of Taxable Goods and that pays or should pay the price of the Taxable Goods.

(3) In the event that the supplied Taxable Services are actually cancelled, either in part or in full, by the Service Recipient, Value Added Tax on the cancelled Taxable Services deducts Output VAT payable to the Taxable Person performing the Taxable Services and reduces:
   a. Input VAT of the Service Recipient Taxable Person, in the event that Input VAT on the cancelled Taxable Services has been credited;
   b. costs or expenses for the Service Recipient Taxable Person, in the event that Value Added Tax on the cancelled Taxable Services is not credited and has been charged to expenses or has been added (capitalised) to the acquisition cost of the assets; or
   c. costs or assets for the Service Recipient not constituting a Taxable Person in the event that Value Added Tax on the cancelled Taxable Services has been charged to expenses or has been added (capitalised) to the acquisition cost of the assets.

(4) Return of Taxable Goods is deemed not to occur in the event that the returned Taxable Goods are replaced with the same Taxable Goods, either in terms of the physical quantity, type or price.

Article 287

(1) The time of Return of Taxable Goods is the time the Taxable Goods are returned by the buyer referred to in Article 286 paragraph (1).

(2) The time of Return of Taxable Services is the time the right or facility or concession is cancelled by the Service Recipient referred to in Article 286 paragraph (3).

Article 288

(1) In the event of Return of Taxable Goods, the buyer referred to in Article 286 paragraph (1) must prepare and submit the goods return note to the seller Taxable Person.

(2) The goods return note referred to in paragraph (1) shall be prepared with the following provisions:
   a. in the electronic format;
   b. prepared and uploaded through a module in the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes;
   c. signed using an Electronic Signature; and
   d. approved by the Directorate General of Taxes.

(3) The goods return note referred to in paragraph (1) at the minimum lists:
   a. the number of the goods return note;
   b. the code, serial number and date of the Tax Invoice for the returned Taxable Goods, for goods return notes for Tax Invoices stipulated under Article 13 paragraph (5) of the Value Added Tax Law;
   c. the number and date of certain documents equivalent to the Tax Invoice for the returned Taxable Goods, for goods return notes for certain documents equivalent to the Tax Invoice stipulated under Article 13 paragraph (6) of the Value Added Tax Law;

d. the name, address and Taxpayer Identification Number of the buyer referred to in Article 286 paragraph (1);
e. the name, address and Taxpayer Identification of the seller Taxable Person;
f. the types of the goods and the amount of the selling price of the returned Taxable Goods;
g. Value Added Tax on the returned Taxable Goods or Value Added Tax and Sales Tax on Luxury Goods on the returned Taxable Luxury Goods;
h. the date of the preparation of the goods return note; and
i. the name and signature of the party entitled to sign the goods return note.

(4) The goods return note referred to in paragraph (1) must be prepared at the time the Taxable Goods are returned.

(5) The Return of Taxable Goods referred to in paragraph (1) is deemed not to occur in the event that:
a. the goods return note is not prepared pursuant to the provisions referred to in paragraph (2);
b. the goods return note does not completely list the details referred to in paragraph (3);
c. the goods return note is not prepared at the time Taxable Goods are returned pursuant to the provisions referred to in paragraph (4); and/or
d. the goods return note is not submitted to the seller Taxable Person referred to in paragraph (1).

Article 289

(1) In the event of Cancellation of Taxable Services, the Service Recipient referred to in Article 286 paragraph (3) must prepare and submit the credit note to the Taxable Person performing the Taxable Services.

(2) The credit note referred to in paragraph (1) shall be prepared with the following provisions:
a. in the electronic format;
b. prepared and uploaded through a module in the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes;
c. signed using Electronic Signature; and
d. approved by the Directorate General of Taxes.

(3) The credit note referred to in paragraph (1) at the minimum lists:
a. the number of the credit note;
b. the code, serial number and date of the Tax Invoice for the cancelled Taxable Services, for the credit note for Tax Invoices stipulated under Article 13 paragraph (5) of the Value Added Tax Law;
c. the number and date of certain documents equivalent to the Tax Invoice for the cancelled Taxable Services, for the credit note for certain documents equivalent to the Tax Invoice stipulated under Article 13 paragraph (6) of the Value Added Tax Law;

d. the name, address and Taxpayer Identification Number of the Service Recipient referred to in Article 286 paragraph (3);
e. the name, address and Taxpayer Identification Number of the Taxable Person providing Taxable Services;
f. the type of service and the amount of the Reimbursement for the cancelled Taxable Services;
g. Value Added Tax on the cancelled Taxable Services;
h. the date of the preparation of the credit note; and
i. the name and signature of the party entitled to sign the credit note.

(4) The credit note referred to in paragraph (1) must be prepared at the time the Taxable Services are cancelled.

(5) The cancellation of the supply of Taxable Services referred to in paragraph (1) is deemed not to occur in the event that:
a. the credit note is not prepared pursuant to the provisions referred to in paragraph (2);
b. the credit note does not completely list the details referred to in paragraph (3);
c. the credit note is not prepared at the time the Taxable Services are cancelled pursuant to the provisions referred to in paragraph (4); and/or
d. the credit note is not submitted to the Taxable Person performing the Taxable Services referred to in paragraph (1).

Article 290

(1) Output VAT or Output VAT and Sales Tax on Luxury Goods deduction by the seller Taxable Person referred to in Article 286 paragraph (1) and/or the Taxable Person performing the Taxable Services referred to in Article 286 paragraph (3) shall be conducted in the Taxable Period the Return of Taxable Goods referred to in Article 287 paragraph (1) and/or Cancellation of Taxable Services referred to in Article 287 paragraph (2) occur.

(2) Input VAT deduction, asset deduction or cost deduction, by the buyer referred to in Article 286 paragraph (1) and/or the Service Recipient referred to in Article 286 paragraph (3) shall be conducted in the Taxable Period of the Return of Taxable Goods referred to in Article 287 paragraph (1) and/or the Cancellation of Taxable Services referred to in Article 287 paragraph (2) occurs.

Section Fourteen
Procedures for the Collection, Remittance and Filing of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods by State-Owned Enterprises and Certain Companies Directly Held by State-Owned Enterprises as Value Added Tax Collection Agents

Article 291

(1) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable on the supply of Taxable Goods and/or Taxable Services by a

partner to a Value Added Tax Collection Agent are collected, remitted and filed by the Value Added Tax Collection Agent.

(2) The partner referred to in paragraph (1) is a Taxable Person supplying Taxable Goods and/or Taxable Services to the Value Added Tax Collection Agent.

(3) In the event of a supply of Taxable Goods and/or Taxable Services by the Value Added Tax Collection Agent referred to in paragraph (1) to another Value Added Tax Collection Agent as referred to in paragraph (1), Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable are collected, remitted and filed by the Value Added Tax Collection Agent supplying the Taxable Goods and/or Taxable Services.

Article 292

(1) The Value Added Tax Collection Agents referred to in Article 291 paragraph (1) include:
   a. State-Owned Enterprises;
   b. State-Owned Enterprises subject to the restructuring by the government after 1 April 2015 and the restructuring is conducted through the transfer of state-owned shares to other State-Owned Enterprises; and
   c. certain companies directly held by State-Owned Enterprises.

(2) The certain companies referred to in paragraph (1) subparagraph c are companies directly held by State-Owned Enterprises with shareholding above 25% (twenty-five per cent).

(3) The certain companies directly held by State-Owned Enterprises referred to in paragraph (1) subparagraph c are stipulated by the Minister.

(4) In the event that the companies referred to in paragraph (1) subparagraph b and subparagraph c are no longer directly held by State-Owned Enterprises, the companies concerned are no longer appointed as Value Added Tax Collection Agents.

Article 293

(1) The amount of Value Added Tax collected by Value Added Tax Collection Agent referred to in Article 291 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.

(2) In the event that the supply of Taxable Goods, in addition to being subject to Value Added Tax payable is also subject to Sales Tax on Luxury Goods payable, the amount of Sales Tax on Luxury Goods collected by the Value Added Tax Collection Agent referred to in Article 291 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.

Article 294

(1) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods are not collected by the Value Added Tax Collection Agent in the event of:
   a. payments amounting to a maximum of IDR10,000,000.00 (ten million rupiah), including the amount of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable and not constituting split

payments of transactions with an actual value of more than IDR10,000,000.00 (ten million rupiah);

b. payments of supplies of Taxable Goods and/or Taxable Services that pursuant to statutory provisions in the field of taxation, obtain the subject to Value Added Tax but not collected or exempt from Value Added Tax facility;
c. payments of supplies of oil fuel and/or non-oil fuel by PT Pertamina (Persero) and/or subsidiaries of PT Pertamina (Persero);
d. payments of supplies of telecommunication services by telecommunications companies;
e. payments of air transport services supplied by airline companies; and/or
f. other payments of supplies of goods and/or services that pursuant to statutory provisions in the field of taxation, are not subject to Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods.

(2) Subsidiaries of PT Pertamina (Persero) referred to in paragraph (1) subparagraph c include PT Pertamina Patra Niaga, PT Kilang Pertamina Internasional, PT Elnusa Petrofin and other subsidiaries of PT Pertamina (Persero) appointed to carry out the sales and/or distribution functions of oil fuel and/or non-oil fuel.

(3) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable referred to in paragraph (1) subparagraph a, subparagraph b, subparagraph c, subparagraph d and subparagraph e, are collected, remitted and filed by the partner referred to in Article 291 paragraph (1) pursuant to statutory provisions in the field of Value Added Tax.

Article 295

(1) The partner referred to in Article 291 paragraph (1) is required to prepare a Tax Invoice for each supply of Taxable Goods and/or Taxable Services to the Value Added Tax Collection Agent.

(2) The Tax Invoice referred to in paragraph (1) must be prepared at:
a. the time the Taxable Goods and/or Taxable Services are supplied;
b. the time the payment is received in the event that the payment is received before the supply of Taxable Goods and/or before the supply of Taxable Services;
c. the term payment is received in the event of a supply of a part of work phases; or
d. other times stipulated by the Minister.

(3) The Tax Invoice referred to in paragraph (1) is prepared pursuant to statutory provisions in the field of taxation on Tax Invoices.

(4) The partner is required to file the Tax Invoice referred to in paragraph (1) in the Periodic Value Added Tax Returns.

Article 296

(1) The collection of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods referred to in Article 291 paragraph (1) shall be conducted at the times referred to in Article 295 paragraph (2).

(2) The Value Added Tax Collection Agent referred to in Article 291 paragraph (1) is required to remit Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip, no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) ends pursuant to statutory provisions in the field of Value Added Tax.
(3) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in paragraph (2) is prepared using the name of the Value Added Tax Collection Agent.
(4) The Value Added Tax Collection Agent referred to in Article 291 paragraph (1) is required to file Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected and remitted no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) using Periodic Value Added Tax Returns.
(5) The Periodic Value Added Tax Returns referred to in paragraph (4) use Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(6) The Value Added Tax Collection Agent referred to in Article 291 paragraph (1) of Taxable Person status, may set off the over-collection of Value Added Tax as the VAT Output deduction in the calculation of Value Added Tax underpayment or Value Added Tax overpayment in the Taxable Period in the Periodic Value Added Tax Returns.

Article 297

(1) In the event that the partner referred to in Article 291 paragraph (1) does not fulfil the provisions referred to in Article 295 paragraph (1) and paragraph (4), the partner is subject to penalties as stipulated under the General Provisions and Tax Procedures Law.
(2) In the event that the Value Added Tax Collection Agent referred to in Article 291 paragraph (1) does not fulfil the provisions referred to in Article 296 paragraph (1), paragraph (2) and paragraph (4), the Value Added Tax Collection Agent is subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Section Fifteen
The Appointment of Contractors of Oil and Gas Concession Cooperation Contracts and Contractors or Power of Attorney Holders/Geothermal Resource Concession Permit Holders to Collect, Remit and File Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods as Well as Procedures for the Collection, Remittance and Filing

Article 298

(1) Contractors or power of attorney holders/permit holders are appointed as Value Added Tax Collection Agents.

(2) The Contractors or power of attorney holders/permit holders referred to in paragraph (1) are:
   a. contractors of oil and gas concession cooperation contracts; and
   b. contractors or power of attorney holders/geothermal resource concession permit holders,

   that include the head office, branches and units.

Article 299

(1) A Contractor or power of attorney holder/permit holder collects, remits and files Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable on a supply of Taxable Goods and/or Taxable Services by a partner to the contractor or power of attorney holder/permit holder.
(2) The partner referred to in paragraph (1) is a Taxable Person supplying Taxable Goods and/or Taxable Services to the contractor or power of attorney holder/permit holder.

Article 300

(1) The amount of Value Added Tax that must be collected by the contractor or power of attorney holder/permit holder referred to in Article 299 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.
(2) In the event that a supply of Taxable Goods in addition to being subject to Value Added Tax is also subject to Sales Tax on Luxury Goods payable, the amount of Sales Tax on Luxury Goods collected by the contractor or power of attorney holder/permit holder referred to in Article 299 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.

Article 301

(1) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods are not collected by the contractor or power of attorney holder/permit holder in the event of:
   a. payments amounting to a maximum of IDR10,000,000.00 (ten million rupiah), including the amount of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable and not constituting split payments of transactions with an actual value of more than IDR10,000,000.00 (ten million rupiah);
   b. payments of supplies of Taxable Goods and/or Taxable Services that pursuant to statutory provisions in the field of taxation obtain the subject to Value Added Tax but not collected or exempt from Value Added Tax facility;
   c. payments of supplies of oil fuel and/or non-oil fuel by PT Pertamina (Persero) and/or subsidiaries of PT Pertamina (Persero);
   d. payments of supplies of telecommunication services by telecommunications companies;
   e. payments of air transport services supplied by airline companies; and/or

f. other payments of supplies of goods and/or services that pursuant to statutory provisions in the field of taxation, are not subject to Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods.

(2) Subsidiaries of PT Pertamina (Persero) referred to in paragraph (1) subparagraph c include PT Pertamina Patra Niaga, PT Kilang Pertamina Internasional, PT Elnusa Petrofin and other subsidiaries of PT Pertamina (Persero) appointed to carry out the sales and/or distribution functions of oil fuel and/or non-oil fuel.

(3) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable referred to in paragraph (1) subparagraph a, subparagraph b, subparagraph c, subparagraph d and subparagraph e are collected, remitted and filed by the partner pursuant to statutory provisions in the field of Value Added Tax.

Article 302

(1) The partner referred to in Article 299 paragraph (2) is required to prepare a Tax Invoice for each supply of Taxable Goods and/or Taxable Services to a contractor or power of attorney holder/permit holder.

(2) The Tax Invoice referred to in paragraph (1) must be prepared at:
   a. the time the Taxable Goods and/or Taxable Services are supplied;
   b. the time the payment is received in the event that the payment is received before the supply of Taxable Goods and/or before the supply of Taxable Services;
   c. the term payment is received in the event of a supply of a part of work phases; or
   d. other times stipulated by the Minister.

(3) The Tax Invoice referred to in paragraph (1) is prepared pursuant to statutory provisions in the field of Value Added Tax stipulating Tax Invoices.

(4) The partner is required to file the Tax Invoice referred to in paragraph (1) in the Periodic Value Added Tax Returns.

Article 303

(1) The collection of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods referred to in Article 299 paragraph (1) shall be conducted at the times referred to in Article 302 paragraph (2).

(2) The contractor or power of attorney holder/permit holder is required to remit Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip, no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) ends pursuant to statutory provisions in the field of Value Added Tax.

(3) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in paragraph (2) is prepared using the name of the contractor or power of attorney holder/permit holder.

(4) The Contractor or power of attorney holder/permit holder is required to file Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected and remitted no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) using Periodic Value Added Tax Returns.
(5) The Periodic Value Added Tax Returns referred to in paragraph (4) use the Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(6) The Contractor or power of attorney holder/permit holder referred to in Article 298 paragraph (1) may set off the over-collection of Value Added Tax as Output VAT deduction in the calculation of Value Added Tax underpayment or Value Added Tax overpayment in the Taxable Period in the Periodic Value Added Tax Returns.

Article 304

(1) Contractors or power of attorney holders/permit holders referred to in Article 298 paragraph (1) that do not fulfil the provisions referred to in Article 303 paragraph (1), paragraph (2) and paragraph (4) are subject to penalties pursuant to statutory provisions in the field of taxation.
(2) The partner referred to in Article 299 paragraph (2) that does not fulfil the provisions referred to in Article 302 paragraph (1), paragraph (2) and paragraph (4) is subject to penalties pursuant to statutory provisions in the field of taxation.

Section Sixteen
The Appointment of Special Mining Business Permit for Production Operations Holders to Collect, Remit and File Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods as Well as Procedures for the Collection, Remittance and Filing

Article 305

(1) Special mining business permit for production operations holders are appointed as Value Added Tax Collection Agents.
(2) Special mining business permit for production operations holders referred to in paragraph (1) are special mining business permit for production operations holders with the following criteria:
    a. constituting changes in the form of a mining business of contracts of work whose contracts have not yet expired;
    b. engaged in the mineral mining business sector; and
    c. the permit is issued by the minister who administers governmental affairs in the field of energy and mineral resources until 31 December 2019,

    pursuant to statutory provisions.

Article 306

(1) A special mining business permit for production operations holder collects, remits and files Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable on a supply of Taxable Goods and/or

Taxable Services by a partner to the special mining business permit for production operations holder.

(2) The partner referred to in paragraph (1) is a Taxable Person supplying Taxable Goods and/or Taxable Services to the special mining business permit for production operations holder.

Article 307

(1) The amount of Value Added Tax that must be collected by the special mining business permit for production operations holder referred to in Article 306 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.

(2) In the event that the supply of Taxable Goods in addition to being subject to Value Added Tax is also subject to Sales Tax on Luxury Goods payable, the amount of Sales Tax on Luxury Goods collected by the special mining business permit for production operations holder referred to in Article 306 paragraph (1) is calculated pursuant to statutory provisions in the field of Value Added Tax.

Article 308

(1) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods are not collected by special mining business permit for production operations holders in the event of:
   a. payments amounting to a maximum of IDR10,000,000.00 (ten million rupiah), including the amount of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable and not constituting split payments of transactions with an actual value of more than IDR10,000,000.00 (ten million rupiah) (ten million rupiah);
   b. payments of supplies of Taxable Goods and/or Taxable Services that pursuant to statutory provisions in the field of taxation obtain the subject to Value Added Tax but not collected or exempt from Value Added Tax facility;
   c. payments of supplies of oil fuel and/or non-oil fuel by PT Pertamina (Persero) and/or subsidiaries of PT Pertamina (Persero);
   d. payments of supplies of telecommunication services by telecommunications companies;
   e. payments of air transport services supplied by airline companies; and/or
   f. other payments of supplies of goods and/or services that pursuant to statutory provisions in the field of taxation are not subject to Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods.

(2) Subsidiaries of PT Pertamina (Persero) referred to in paragraph (1) subparagraph c include PT Pertamina Patra Niaga, PT Kilang Pertamina Internasional, PT Elnusa Petrofin and other subsidiaries of PT Pertamina (Persero) appointed to carry out the sales and/or distribution functions of oil fuel and/or non-oil fuel.

(3) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods payable referred to in paragraph (1) subparagraph a, subparagraph b,

subparagraph c, subparagraph d and subparagraph e are collected, remitted and filed by the partner pursuant to statutory provisions in the field of taxation.

Article 309

(1) The partner referred to in Article 306 paragraph (2) is required to prepare a Tax Invoice for each supply of Taxable Goods and/or Taxable Services to a special mining business permit for production operations holder.
(2) The Tax Invoice referred to in paragraph (1) must be prepared at:
   a. the time the Taxable Goods and/or Taxable Services are supplied;
   b. the time the payment is received in the event that the payment is received before the supply of Taxable Goods and/or before the supply of Taxable Services;
   c. the term payment is received in the event of a supply of a part of work phases; or
   d. other times stipulated by the Minister.
(3) The Tax Invoice referred to in paragraph (1) is prepared pursuant to statutory provisions stipulating Tax Invoices.
(4) The partner is required to file the Tax Invoices referred to in paragraph (1) in the Periodic Value Added Tax Returns.

Article 310

(1) Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods referred to in Article 306 paragraph (1) are collected at the times referred to in Article 309 paragraph (2).
(2) The special mining business permit for production operations holder is required to remit Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip, no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) ends pursuant to statutory provisions in the field of taxation.
(3) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in paragraph (2) is prepared using the name of the special mining business permit for production operations holder.
(4) The special mining business permit for production operations holder is required to file Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods that have been collected and remitted no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) using Periodic Value Added Tax Returns.
(5) Periodic Value Added Tax Returns referred to in paragraph (4) use Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(6) Special mining business permit for production operations holders referred to in Article 305 paragraph (1) may set off Value Added Tax over-collection as Output VAT deduction the calculation of Value Added Tax

underpayment or Value Added Tax overpayment in the Taxable Period in the Periodic Value Added Tax Returns.

Article 311

(1) The special mining business permit for production operations holder referred to in Article 305 paragraph (1) that does not fulfil the provisions referred to in Article 310 paragraph (1), paragraph (2) and paragraph (4) is subject to penalties pursuant to statutory provisions in the field of taxation.
(2) The partner referred to in Article 306 paragraph (2) that does not fulfil the provisions referred to in Article 309 paragraph (1), paragraph (2) and paragraph (4) is subject to penalties pursuant to statutory provisions in the field of taxation.

Section Seventeen
Value Added Tax on Supplies of Insurance Agent Services, Insurance Brokerage Services and Reinsurance Brokerage Services

Article 312

(1) Value Added Tax is payable on supplies of:
    a. insurance agent services by Insurance Agents to Insurance Company or Sharia Insurance Company;
    b. insurance brokerage services by insurance brokerage companies to Insurance Companies and/or Sharia Insurance Companies; and
    c. reinsurance brokerage services by reinsurance brokerage companies to reinsurance companies and/or sharia reinsurance companies.
(2) Insurance agency services referred to in paragraph (1) subparagraph a are service activities by Insurance Agents in the context of representing Insurance Companies or Sharia Insurance Companies to market insurance products or sharia insurance products.
(3) Insurance brokerage services referred to in paragraph (1) subparagraph b are consulting and/or intermediary service activities in the cancellation of insurance or sharia insurance as well as the handling of claims settlement by acting for and on behalf of the policyholder, the insured or the participant.
(4) Reinsurance brokerage services referred to in paragraph (1) subparagraph c are consulting and/or intermediary service activities in the placement of reinsurance or the placement of sharia reinsurance as well as the handling of claims settlement by acting for and on behalf of Insurance Companies, Sharia Insurance Companies, guarantee companies, sharia guarantee companies, reinsurance companies or sharia reinsurance companies that place reinsurance or sharia reinsurance.
(5) Insurance brokerage companies referred to in paragraph (1) subparagraph b are companies that administer consulting and/or intermediary service businesses in the cancellation of insurance or sharia insurance as well as the handling of claims settlement by acting for and on behalf of the policyholder, the insured or the participant.

(6) Reinsurance brokerage companies referred to in paragraph (1) subparagraph c are companies that administer consulting and/or intermediary service businesses in the placement of reinsurance or the placement of sharia reinsurance and the handling of claims settlement by acting for and on behalf of Insurance Companies, Sharia Insurance Companies, guarantee companies, sharia guarantee companies, reinsurance companies or sharia reinsurance companies that place reinsurance or sharia reinsurance.
(7) Reinsurance companies referred to in paragraph (1) subparagraph c are companies that administer reinsurance service businesses for the risks assumed by Insurance Companies, guarantee companies or other reinsurance companies.
(8) Sharia reinsurance companies referred to in paragraph (1) subparagraph c are companies that administer risk management business based on sharia principles on the risks assumed by Sharia Insurance Companies, sharia guarantee companies or other sharia reinsurance companies.
(9) Value Added Tax payable referred to in paragraph (1) is collected, remitted and filed by Insurance Companies, Sharia Insurance Companies, reinsurance companies or sharia reinsurance companies appointed as Value Added Tax Collection Agents pursuant to this Ministerial Regulation.

Article 313

(1) Value Added Tax payable referred to in Article 312 paragraph (1) is collected and remitted at a certain amount.
(2) Certain amount referred to in paragraph (1) amounts to:
    a. 10% (ten per cent) of the Value Added Tax rate multiplied by the commission or remuneration in whatever name and form paid to the Insurance Agent; or
    b. 20% (twenty per cent) of the Value Added Tax rate multiplied by the commission or remuneration in whatever name and form received by the insurance brokerage company or reinsurance brokerage company.
(3) The Value Added Tax rates referred to in paragraph (2) shall comply with the provisions under Article 7 paragraph (1) of the Value Added Tax Law.
(4) The commission or remuneration referred to in paragraph (2) is the value of the payment before being subject to Withholding Tax or other levies.
(5) Included in the commission or remuneration referred to in paragraph (2) subparagraph a is the commission or remuneration paid by Insurance Companies or Sharia Insurance Companies to Insurance Agents based on the receipt of commission or remuneration for the Insurance Agents under their management.

Article 314

(1) Insurance agents, insurance brokerage companies and reinsurance brokerage companies must report their business to the Tax Office whose working area includes the residence or domicile and/or the place of business for VAT registration.

(2) The VAT registration obligation of Insurance Agents, insurance brokerage companies and reinsurance brokerage companies referred to in paragraph (1) also applies to Insurance Agents, insurance brokerage companies and reinsurance brokerage companies that fulfil the criteria as small-scale entrepreneurs pursuant to statutory provisions in the field of Value Added Tax stipulating the threshold of small-scale Value Added Tax entrepreneurs.
(3) Insurance Agents that already have Tax Identification Numbers are deemed to have been registered as Taxable Persons.
(4) Insurance Agents that do not yet have a Taxpayer Identification Number are required to register to the Tax Office whose working area includes the residence or domicile and/or the place of business to be granted a Taxpayer Identification Number.
(5) In the event that Insurance Agents, in addition to supplying Insurance Agent services, also supply other Taxable Goods and/or Taxable Services, the Insurance Agents are required to file their business activities for VAT registration insofar as the amount of their business turnover exceeds the threshold of small-scale entrepreneurs pursuant to statutory provisions in the field of taxation.
(6) Insurance brokerage companies and reinsurance brokerage companies referred to in paragraph (1) are registered as Taxable Persons pursuant to statutory provisions in the field of taxation.
(7) Insurance Agents, insurance brokerage companies and reinsurance brokerage companies that do not fulfil the provisions referred to in paragraph (1), paragraph (2), paragraph (4) and paragraph (5) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 315

(1) An Insurance Agent, insurance brokerage company and reinsurance brokerage company as Taxable Persons are required to prepare a Tax Invoice for a supply of Insurance Agent services, insurance brokerage services and reinsurance brokerage services.
(2) The Tax Invoice referred to in paragraph (1) may be in the form of:
    a. a statement of account from the Insurance Company or Sharia Insurance Company to the Insurance Agent; or
    b. an invoice for the supply of insurance brokerage services or reinsurance brokerage services by the insurance brokerage company and reinsurance brokerage company,

    which constitute certain documents equivalent to the Tax Invoice.
(3) Certain documents equivalent to the Tax Invoice referred to in paragraph (2) subparagraph a are prepared through the systems of the Insurance Company or Sharia Insurance Company.
(4) Certain documents equivalent to the Tax Invoice referred to in paragraph (2) at the minimum contains:

a. the name and Taxpayer Identification Number of the Taxable Person supplying the insurance agent services, insurance brokerage services or reinsurance brokerage services;
b. the serial number and date of the documents prepared by the Taxable Person's system;
c. the value of the commission or remuneration in whatever name and form received by the Taxable Person; and
d. the amount of the collected Value Added Tax.

(5) Certain documents equivalent to the Tax Invoice referred to in paragraph (2) must be prepared:
a. no later than the end of the following month after the month the payment of the commission or remuneration is received by the Insurance Agent; or
b. at the time of the supply of insurance brokerage services or brokerage services pursuant to statutory provisions in the field of Value Added Tax.

(6) Insurance Agents, insurance brokerage companies or reinsurance brokerage companies that do not fulfil the provisions referred to in paragraph (1) and paragraph (5) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 316

(1) The Insurance Company, Sharia Insurance Company, reinsurance company or reinsurance company syariah as Value Added Tax Collection Agents are required to collect Value Added Tax referred to in Article 312 paragraph (1) at the time:
a. of the payment of commission or remuneration by the Value Added Tax Collection Agent to the Insurance Agent; or
b. of the receipt of the premium payment by the Value Added Tax Collection Agent from the insurance brokerage company or reinsurance brokerage company.

(2) The Value Added Tax Collection Agent referred to in paragraph (1) is required to remit Value Added Tax that has been collected on all commissions or remunerations paid to all Insurance Agents, insurance brokerage companies or reinsurance brokerage companies in 1 (one) Taxable Period using 1 (one) Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(3) The Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip referred to in paragraph (2) is prepared using the name of the Value Added Tax Collection Agent.

(4) The Value Added Tax remittance referred to in paragraph (2) is conducted no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) ends and before the Periodic Value Added Tax Returns is filed.

(5) Insurance Companies, Sharia Insurance Companies, reinsurance company or reinsurance company syariah that do not fulfil the provisions referred

to in paragraph (1) and paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 317

(1) Insurance Companies, Sharia Insurance Companies, reinsurance companies or sharia reinsurance companies are required to file Value Added Tax that has been collected and remitted referred to in Article 316 paragraph (2) using Periodic Value Added Tax Returns no later than the end of the following month after the Taxable Period the collection is conducted referred to in Article 316 paragraph (1) ends.
(2) Periodic Value Added Tax Returns referred to in paragraph (1) use Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(3) Insurance Companies, Sharia Insurance Companies, reinsurance companies or sharia reinsurance companies that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 318

(1) Insurance Agents referred to in Article 314 paragraph (1) are deemed to have filed the calculation of Value Added Tax on supplies of insurance agent services.
(2) In the event that the Insurance Agents referred to in paragraph (1):
    a. in addition to supplying insurance agent services also supply other Taxable Goods and/or Taxable Services; and
    b. until a month in the accounting year, the amount of their gross turnover and/or gross revenues for supplies of insurance agent services and supplies of other Taxable Goods and/or Taxable Services does not exceed the threshold of small-scale entrepreneurs pursuant to statutory provisions in the field of taxation,

    the filing of Periodic Value Added Tax Returns for Insurance Agents shall comply with the provisions referred to in paragraph (1).
(3) In the event that Insurance Agents:
    a. in addition to supplying insurance agent services also supply other Taxable Goods and/or Taxable Services; and
    b. until a month in the accounting year, the amount of their gross turnover and/or gross revenues for supplies of insurance agent services and supplies of other Taxable Goods and/or Taxable Services exceeds the threshold of small-scale entrepreneurs pursuant to statutory provisions in the field of taxation,

    the Insurance Agents are required to collect, remit and file Value Added Tax payable on supplies of other Taxable Goods and/or Taxable Services pursuant to statutory provisions in the field of Value Added Tax.
(4) The Insurance Agents referred to in paragraph (3) are required to file supplies of:
    a. insurance agent services referred to in Article 312 paragraph (1) subparagraph a; and

b. supplies of other Taxable Goods and/or Taxable Services,

in Periodic Value Added Tax Returns pursuant to statutory provisions in the field of taxation.

(5) Insurance Agents who do not fulfil the provisions referred to in paragraph (3) and paragraph (4) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 319

(1) Insurance brokerage companies and reinsurance brokerage companies as Taxable Persons are required to file supplies of:
   a. insurance brokerage services referred to in Article 312 paragraph (1) subparagraph b and/or reinsurance brokerage services referred to in Article 312 paragraph (1) subparagraph c; and/or
   b. other Taxable Goods and/or Taxable Services,

   in Periodic Value Added Tax Returns as referred to in Article 162 paragraph (1) subparagraph a number 2.

(2) Insurance brokerage companies and reinsurance brokerage companies that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 320

Input VAT on acquisitions of Taxable Goods and/or Taxable Services in connection with supplies of insurance agent services, insurance brokerage services and reinsurance brokerage services referred to in Article 2 paragraph (1) cannot be credited by Insurance Agents, insurance brokerage companies and reinsurance brokerage companies.

Article 321

In the event of errors in Value Added Tax collection referred to in Article 313 paragraph (1) resulting in the collected Value Added Tax being greater than the tax that should be collected, for the Value Added Tax over-collection:

a. an application for the refund of tax overpayment that should not otherwise be payable may be submitted by the Value Added Tax Collection Agent referred to in Article 312 paragraph (9) that is not of Taxable Person status; or
b. taken into account as an Output VAT deduction in the calculation of Value Added Tax underpayment or Value Added Tax overpayment in the Taxable Period in the Periodic Value Added Tax Returns by the Value Added Tax Collection Agent referred to in Article 312 paragraph (9) that is of Taxable Person status.

Article 322

For payments of commissions or remunerations by Value Added Tax Collection Agents in connection with supplies of insurance agent services, insurance brokerage services and reinsurance brokerage services payable and have been subject to Value Added Tax collection by Insurance Agents, insurance brokerage companies or reinsurance brokerage companies before 1 April 2022, the

Insurance Companies, Sharia Insurance Companies, reinsurance companies or sharia reinsurance companies are excluded from the obligation to collect, remit and file Value Added Tax referred to in Article 312 paragraph (9).

Section Eighteen
Value Added Tax on Self-Building Activities

Article 323

(1) Value Added Tax is imposed on self-building activities.
(2) Value Added Tax referred to in paragraph (1) is payable to individuals or Entities conducting self-building activities.
(3) Self-building activities referred to in paragraph (1) refer to the construction of buildings, both of new buildings and the expansion of old buildings, which are not conducted in the course of business or work by individuals or Entities and whose results are for personal use or used by other parties.
(4) The buildings referred to in paragraph (3) are in the form of 1 (one) or more technical constructions which are permanently planted or attached to one unit of land and/or body of water with the following criteria:
    a. the main construction consists of wood, concrete, masonry or similar materials and/or steel;
    b. designated for residence or a place of business; and
    c. the area of the constructed building is at least 200 m^2 (two hundred square metres).
(5) The self-building activities referred to in paragraph (3) may be conducted:
    a. all at once in a certain period; or
    b. in stages as a single unit of activity insofar as the timeline between the construction stages does not exceed 2 (two) years.
(6) In the event that the timeline between the stages of building construction activities referred to in paragraph (5) subparagraph b exceeds 2 (two) years, the activities constitute separate building construction activities insofar as they fulfil the provisions referred to in paragraph (4).
(7) Included in self-building activities referred to in paragraph (3) are building construction services by other parties for individuals or entities but Value Added Tax on these activities is not collected by other parties.
(8) Other parties collect Value Added Tax on building construction activities referred to in paragraph (7) pursuant to statutory provisions in the field of Value Added Tax.
(9) Individuals or Entities referred to in paragraph (7) may be excluded from the responsibility to pay Value Added Tax on self-building activities insofar as they are able to provide correct data and/or information from other parties, which at the minimum includes:
    a. the identity; and
    b. the full address.

Article 324

(1) Value Added Tax referred to in Article 323 paragraph (1) is calculated, collected and remitted by individuals or Entities conducting self-building activities at a certain amount.
(2) The certain amount referred to in paragraph (1) is the product of the multiplication of 20% (twenty per cent) by the Value Added Tax rate stipulated under Article 7 paragraph (1) of the Value Added Tax Law multiplied by the tax base.
(3) The tax base referred to in paragraph (2) is in the form of a certain value amounting to the total costs incurred and/or paid to construct a building for each Taxable Period until the building is completed, excluding land acquisition costs.

Article 325

(1) The time of supply for Value Added Tax on self-building activities referred to in Article 323 paragraph (1) is when building construction starts until the building is completed.
(2) The place of supply for Value Added Tax for self-building activities is the residence or domicile of the individual or Entity conducting self-building activities.

Article 326

(1) Value Added Tax referred to in Article 323 paragraph (1) must be remitted to the State Treasury using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip no later than the 15th (fifteenth) of the following month after the end of the Taxable Period.
(2) The Taxpayer Identification Number column in the Tax Payment Slip or other administrative means referred to in paragraph (1) is completed with the Taxpayer Identification Number of the individual or Entity conducting the self-building activities referred to in Article 323 paragraph (2).
(3) The Taxable Object Number column in the Tax Payment Slip or other administrative means referred to in paragraph (1) is completed with the taxable object number.
(4) The obligation to remit Value Added Tax referred to in paragraph (1) is excluded for individuals or Entities conducting self-building activities in the event that Value Added Tax referred to in Article 323 paragraph (1) in the Taxable Period concerned amounts to nil.

Article 327

(1) The Tax Payment Slip and/or other administrative means referred to in Article 326 paragraph (1) that fulfil the provisions referred to in:
    a. Article 326 paragraph (2); or
    b. Article 326 paragraph (2) and paragraph (3),
    are certain documents equivalent to the Tax Invoice.
(2) Value Added Tax listed in certain documents equivalent to the Tax Invoice referred to in paragraph (1) is creditable input VAT insofar as it fulfils provisions on Input VAT crediting pursuant to statutory provisions in the field of Value Added Tax.

Article 328

(1) Individual or Entities conducting self-building activities are required to file the remittance of Value Added Tax referred to in Article 326 paragraph (1) with the following provisions:
   a. the individuals or entities constituting Taxable Persons shall file the remittance of Value Added Tax in the Periodic Value Added Tax Returns to the Tax Office of registration; and
   b. individuals or Entities not constituting Taxable Persons are deemed to have filed the remittance of Value Added Tax insofar as they have remitted Value Added Tax.

(2) The obligation to file the Value Added Tax remittance referred to in paragraph (1) is excluded for individuals or Entities conducting self-building activities in the event that there is no remittance of Value Added Tax as referred to in Article 326 paragraph (4).

Article 329

In the event that an individual or Entity conducting self-building activities:
a. does not perform the obligation to remit Value Added Tax referred to in Article 326 paragraph (1) and/or the filing obligation referred to in Article 328 paragraph (1); or
b. has remitted or filed Value Added Tax on self-building activities but based on data held and obtained by the Directorate General of Taxes there is underpaid and/or under-reported Value Added Tax,

the Head of the Tax Office whose working area covers the residence or domicile of the individual Taxpayer or Entity conducting self-building activities, may submit a written appeal to the individual or Entity to fulfil the tax obligations and follow up pursuant to statutory provisions in the field of taxation.

Article 330

In the event that an individual conducting self-building activities does not yet have a Taxpayer Identification Number, the Head of the Tax Office referred to in Article 329 may issue a Taxpayer Identification Number *ex officio* pursuant to statutory provisions in the field of taxation.

Article 331

Input VAT paid on acquisitions of Taxable Goods and/or Taxable Services, import of Taxable Goods as well as the utilisation of intangible Taxable Goods and/or the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory in connection with self-building Activities is non-creditable.

Section Nineteen
Procedures for the Appointment of Other Parties, Collection, Remittance and Filing of Value Added Tax on the Utilisation of Intangible Taxable Goods and/or Taxable Services from Outside the Customs Territory within the Customs Territory through Electronic Commerce

Article 332

(1) Value Added Tax is imposed on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory within the Customs Territory through Electronic Commerce.
(2) Value Added Tax referred to in paragraph (1) is collected, remitted and filed by Electronic Commerce Merchants appointed by the Minister.
(3) Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory within the Customs Territory originating from a transaction between a Foreign Merchant or Foreign Service Provider and Goods Beneficiary and/or Service Beneficiary is directly collected, remitted and filed by the Foreign Merchant or Foreign Service Provider appointed as Other Parties.
(4) In the event that a Foreign Merchant or Foreign Service Provider conducts a transaction with a Goods Beneficiary and/or Service Beneficiary through a Foreign Electronic Commerce Operator or Domestic Electronic Commerce Operator, Value Added Tax payable on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory within the Customs Territory is collected, remitted and filed by the Foreign Merchant, Foreign Service Provider, Foreign Electronic Commerce Operator or Domestic Electronic Commerce Operator that:
    a. is appointed as Other Parties; and
    b. issues the commercial invoice, billing, order receipt or other similar documents.
(5) The utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory within the Customs Territory other than that subject to Value Added Tax collection referred to in paragraph (3) and paragraph (4), remains subject to Value Added Tax payable and Value Added Tax is collected, remitted and self-filed by the Goods Beneficiary and/or Service Beneficiary as stipulated under Article 3A the Value Added Tax Law.

Article 333

(1) The utilisation of intangible Taxable Goods referred to in Article 332 paragraph (1) includes:
    a. the use or right to use copyright in the fields of literature, arts or scientific works, patents, designs or models, plans, secret formulas or processes, trademarks or other forms of intellectual/industrial property rights or similar rights;
    b. the use or right to use industrial, commercial or scientific tools/equipment;

c. the use of knowledge or information in the scientific, technical, industrial or commercial sectors;
d. the use of additional or complementary assistance in relation to the use or right to use the rights in subparagraph a, the use or the right to use industrial tools/equipment in subparagraph b or the provision of knowledge or information in subparagraph c, in the form of:
   1. the receipt or the right to receive image or sound recordings or both, which are distributed to the public via satellites, cables, fibre optic or similar technologies;
   2. the use or right to use images or sound recordings or both, for television or radio broadcasts broadcast/transmitted via satellites, cables, fiber optic or similar technologies; and
   3. the use or right to use part or all radio communication spectrum;
e. the use or right to use motion picture films, films or videotapes for television broadcasts or sound tapes for radio broadcasts; and
f. acquisitions of all or part of the rights related to the use of or the granting of intellectual property rights, industrial property rights or other rights referred to in subparagraph a to subparagraph e.

(2) The utilisation of intangible Taxable Goods referred to in Article 332 paragraph (1) includes the utilisation of Digital Goods.
(3) The utilisation of Taxable Services referred to in Article 332 paragraph (1) includes the utilisation of Digital Services.

Article 334

(1) Electronic Commerce Merchants appointed as Other Parties referred to in Article 332 paragraph (2) are Electronic Commerce Merchants that have fulfilled certain criteria.
(2) The certain criteria referred to in paragraph (1) include:
   a. the value of transactions with the Goods Beneficiary and/or Service Beneficiary in Indonesia exceeds a certain amount in 12 (twelve) months; and/or
   b. the amount of traffic or access exceeds a certain amount in 12 (twelve) months.
(3) The transaction value and the amount of traffic or access exceeding the certain amount referred to in paragraph (2) shall be stipulated by the Director General of Taxes.
(4) The authority to appoint as Other Parties by the Minister referred to in Article 332 paragraph (2) is delegated to the Director General of Taxes.
(5) The appointment as Other Parties referred to in paragraph (4) shall come into force at the beginning of the following month after the date of the decision on the appointment is enacted.
(6) The Other Parties referred to in paragraph (4) shall be granted an identification number in the form of a Taxpayer Identification Number as a means of tax administration used as personal identification or identity of Other Parties in exercising their tax rights and fulfilling their tax obligations.

(7) Electronic Commerce Merchants that have not been appointed as Other Parties, but choose to be appointed as Other Parties, may notify the Director General of Taxes.

Article 335

(1) The Goods Beneficiary and/or Service Beneficiary referred to in Article 332 paragraph (3) and paragraph (4) are individuals or Entities that fulfil the following criteria:
   a. residing or domiciled in Indonesia;
   b. performing payments using debit, credit and/or other payment facilities provided by institutions in Indonesia; and/or
   c. transacting using an internet protocol address in Indonesia or using a telephone number with Indonesia's country code.

(2) The criteria referred to in paragraph (1) subparagraph a are fulfilled in the event that:
   a. the correspondence or billing address of the Goods Beneficiary and/or Service Beneficiary is in Indonesia; and/or
   b. the selected country during registration on the webpage and/or system provided and/or determined by Other Parties is Indonesia.

Article 336

(1) Value Added Tax collected by Other Parties amounts to the rates stipulated under Article 7 paragraph (1) of the Value Added Tax Law multiplied by the tax base.

(2) The tax base referred to in paragraph (1) amounts to the value in the form of money paid by the Goods Beneficiary and/or Service Beneficiary, excluding the collected Value Added Tax.

(3) Value Added Tax referred to in paragraph (1) is collected at the time of payment by the Goods Beneficiary and/or Service Beneficiary.

Article 337

(1) Other Parties prepare the Value Added Tax collection receipt for the collected Value Added Tax referred to in Article 332 paragraph (3) and paragraph (4).

(2) The Value Added Tax collection receipt referred to in paragraph (1) is in the form of a commercial invoice, billing, order receipt or other similar documents as well as states Value Added Tax collection and that payment has been made.

(3) The Value Added Tax collection receipt referred to in paragraph (1) is a certain document equivalent to the Tax Invoice.

(4) The certain documents equivalent to the Tax Invoice referred to in paragraph (3) must be prepared based on guidelines issued by the Director General of Taxes.

Article 338

(1) Other Parties are required to remit the collected Value Added Tax referred to in Article 332 paragraph (3) and paragraph (4) for each Taxable Period no later than the end of the following month after the Taxable Period ends.

(2) The remittance of the collected Value Added Tax referred to in paragraph (1) is conducted electronically to the State Treasury account pursuant to statutory provisions stipulating electronic tax remittance.
(3) Other Parties residing or domiciled within the Customs Territory remit the collected Value Added Tax referred to in paragraph (1) using rupiah.
(4) Other Parties residing or domiciled outside the Customs Territory remit the collected Value Added Tax referred to in paragraph (1) using:
    a. rupiah, at the exchange rate stipulated by a Ministerial Decree in force on the date of remittance; or
    b. United States dollars.
(5) In the event that Other Parties do not fulfil the provisions referred to in paragraph (1), the Other Parties concerned are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 339

(1) Other Parties are required to file Value Added Tax that has been collected referred to in Article 332 paragraph (3) and paragraph (4) and that has been remitted referred to in Article 338 paragraph (1), for each Taxable Period, no later than the end of the following month after the Taxable Period ends, using Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(2) In the event that Other Parties do not fulfil the provisions referred to in paragraph (1), the Other Parties concerned are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Section Twenty
Value Added Tax and Income Tax on Crypto Asset Trading Transactions

Article 340

Supplies of:
a. intangible Taxable Goods in the form of Crypto Assets by Crypto Assets Sellers;
b. Taxable Services in the form of the provision of Electronic Means services used for Crypto Asset trading transactions, by Electronic Commerce Operators; and/or
c. Taxable Services in the form of Crypto Asset transaction verification services and/or management services of a group of Crypto Asset miners (mining pool) by Crypto Asset Miners,

are subject to Value Added Tax.

Article 341

(1) Supplies of Crypto Assets referred to in Article 340 letter a include supplies of Crypto Assets by Crypto Assets Sellers within the Customs Territory and/or to Crypto Asset Buyers within the Customs Territory, through Electronic Means organised by Electronic Commerce Operators.
(2) Supplies of Crypto Assets referred to in paragraph (1) are:
    a. buying and selling of Crypto Assets using fiat money;

b. swap of Crypto Assets with other Crypto Assets; and/or
c. swap of Crypto Assets with goods other than Crypto Assets and/or services.

Article 342

(1) Value Added Tax payable on supplies of Crypto Assets referred to in Article 340 letter a is collected, remitted and filed by Electronic Commerce Operator.
(2) Electronic Commerce Operators referred to in paragraph (1) are operators that conduct service activities to facilitate Crypto Assets transactions which at the minimum are in the form of the following service activities:
   a. buying and selling of Crypto Assets using fiat money;
   b. swap of Crypto Assets with other Crypto Assets; and/or
   c. e-wallet, including the deposit, withdrawal, transfer of Crypto Assets to other parties' accounts and the provision and/or management of Crypto Assets storage media.

Article 343

(1) Value Added Tax payable referred to in Article 340 letter a is collected and remitted at a certain amount.
(2) The certain amount referred to in paragraph (1) is set to amount to:
   a. 1% (one per cent) of the Value Added Tax rate stipulated under Article 7 paragraph (1) of the Value Added Tax Law multiplied by the value of the Crypto Asset transaction, in the event that the Electronic Commerce Operator is a Crypto Asset Physical Trader;
   b. 2% (two per cent) of the Value Added Tax rate stipulated under Article 7 paragraph (1) of the Value Added Tax Law multiplied by the value of the Crypto Asset transaction, in the event that the Electronic Commerce Operator is not a Crypto Asset Physical Trader.
(3) The value of the transaction referred to in paragraph (2) is:
   a. the value in money paid by the Crypto Asset Buyer, excluding Value Added Tax and Sales Tax on Luxury Goods, in the event that the Crypto Asset transaction constitutes buying and selling of Crypto Assets using fiat money referred to in Article 341 paragraph (2) subparagraph a;
   b. the value of each Crypto Asset supplied by the parties to the transaction, excluding Value Added Tax and Sales Tax on Luxury Goods, in the event that the Crypto Asset transaction constitutes a swap of Crypto Assets with other Crypto Assets referred to in Article 341 paragraph (2) subparagraph b; or
   c. the value of the Crypto Assets transferred to other parties' accounts, in the event that the transaction is a swap of Crypto Assets with goods other than Crypto Assets and/or services referred to in Article 341 paragraph (2) subparagraph c.
(4) In the event that the supply of Crypto Assets is conducted in the context of buying and selling of Crypto Assets as referred to in Article 342 paragraph

(2) subparagraph a using other than rupiah, the transaction value referred to in paragraph (2) amounts to the conversion value into rupiah based on the exchange rate stipulated by the Minister applicable at the time of Value Added Tax collection.

(5) In the event that the supply of Crypto Assets is conducted in the context of a swap of Crypto Assets with other Crypto Assets as referred to in Article 342 paragraph (2) subparagraph b or a transfer of Crypto Assets to other parties' accounts referred to in Article 342 paragraph (2) subparagraph c, the transaction value referred to in paragraph (2) amounts to the transaction value of the Crypto Assets into in rupiah based on:
   a. the value set by the futures exchange organising Crypto Asset trading; or
   b. the value in the system owned by the Electronic Commerce Operator, that is applied consistently.

Article 344

(1) The collection of Value Added Tax payable on a supply of Crypto Assets by the Electronic Commerce Operator referred to in Article 342 paragraph (1) is conducted at the time:
   a. the payment from the Crypto Asset Buyer is received by the Electronic Commerce Operator, in the event that the Crypto Asset transaction constitutes buying and selling of Crypto Assets using fiat money referred to in Article 341 paragraph (2) subparagraph a; or
   b. of the swap of Crypto Assets to other parties' accounts, in the event that the Crypto Asset transaction constitutes a swap of Crypto Assets with other Crypto Assets referred to in Article 341 paragraph (2) subparagraph b; or
   c. of the transfer of Crypto Assets to other parties' accounts, in the event that the transaction is a swap of Crypto Assets with goods other than Crypto Assets and/or services referred to in Article 341 paragraph (2) subparagraph c.

(2) Electronic Commerce Operators are required to prepare the collection receipt for Value Added Tax payable referred to in paragraph (1) in the form of Documents Equivalent to Unified Withholding Tax/Collection Receipts.

(3) Electronic Commerce Operators referred to in Article 342 paragraph (1) are required to remit Value Added Tax that has been collected using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(4) The remittance of Value Added Tax that has been collected referred to in paragraph (3) is conducted no later than the end of the following month after the Taxable Period the collection is conducted referred to in paragraph (1) ends pursuant to statutory provisions in the field of taxation.

(5) Electronic Commerce Operators that do not fulfil the provisions referred to in paragraph (2) and paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 345

(1) Electronic Commerce Operators referred to in Article 342 paragraph (1) are required to file Value Added Tax that has been collected and remitted using Periodic Value Added Tax Returns.
(2) Periodic Value Added Tax Returns referred to in paragraph (1) must be filed no later than the end of the following month after the Taxable Period the collection is conducted as referred to in Article 344 paragraph (1) ends.
(3) Periodic Value Added Tax Returns referred to in paragraph (1) are prepared using Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(4) Electronic Commerce Operators that do not fulfil the provisions referred to in paragraph (1) and paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 346

In the event of errors in the Value Added Tax collection referred to in Article 343 paragraph (1) resulting in the collected Value Added Tax being greater than the tax that should otherwise be collected, for the over-collection of Value Added Tax, an application for the refund of tax overpayment that should not otherwise be payable may be submitted as referred to in Article 122 by the Electronic Commerce Operator referred to in Article 342 paragraph (1).

Article 347

(1) In the event that the Crypto Assets Sellers referred to in Article 340 letter a constitute Taxable Persons pursuant to statutory provisions in the field of taxation, to supplies of Crypto Assets by the Crypto Assets Sellers, the following provisions shall apply:
    a. the Crypto Assets Sellers are required to prepare Tax Invoices for supplies of Crypto Assets;
    b. Documents Equivalent to Unified Withholding Tax/Collection Receipts referred to in Article 344 paragraph (2) prepared through Electronic Means organised by the Electronic Commerce Operators are determined as certain documents equivalent to the Tax Invoice;
    c. the Crypto Assets Sellers do not collect Value Added Tax on supplies of Crypto Assets through the Electronic Commerce Operator's system;
    d. the Crypto Assets Sellers file Value Added Tax collected by Electronic Commerce Operators on supplies of Crypto Assets referred to in Article 342 paragraph (1) in Periodic Value Added Tax Returns in the supplies on which Value Added Tax is collected by Other Parties column; and
    e. Input VAT on acquisitions of Taxable Goods and/or Taxable Services in connection with supplies of Crypto Assets referred to in Article 340 letter a cannot be credited by Crypto Assets Sellers.

(2) Crypto Assets Sellers that do not fulfil the provisions referred to in paragraph (1) subparagraph a are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 348

(1) In the event that the Electronic Commerce Operators referred to in Article 342 paragraph (1) are Foreign Electronic Commerce Operators, the Electronic Commerce Operators may be appointed as Other Parties pursuant to statutory provisions stipulating procedures for the appointment of collection agents, collection and remittance as well as filing of Value Added Tax on the utilisation of intangible Taxable Goods and/or Taxable Services from outside the Customs Territory within the Customs Territory through Electronic Commerce.
(2) Procedures for the appointment of collection agents, remittance and filing of Value Added Tax by Electronic Commerce Operators referred to in paragraph (1) are implemented as referred to in Article 332 to Article 339.

Article 349

The provision of Electronic Means services used to facilitate Crypto Asset transactions referred to in Article 340 letter b, may be in the form of service activities of:

a. buying and selling of Crypto Assets using fiat money;
b. swap of Crypto Assets with other Crypto Assets; and/or
c. e-wallet, including the deposit, withdrawal, transfer of Crypto Assets to other parties' accounts and the provision and/or management of Crypto Assets storage media.

Article 350

(1) Value Added Tax payable on supplies of the provision of Electronic Means services referred to in Article 340 letter b must be collected by Electronic Commerce Operators.
(2) Electronic Commerce Operators referred to in paragraph (1) are entrepreneurs that have been registered as Taxable Persons.
(3) Electronic Commerce Operators that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 351

(1) Value Added Tax payable referred to in Article 350 paragraph (1) is calculated by multiplying the Value Added Tax rate stipulated under Article 7 paragraph (1) of the Value Added Tax Law by the tax base.
(2) The tax base referred to in paragraph (1) in the form of reimbursement amounts to the commission or fees in whatever name and form, including commission or fees received by Electronic Commerce Operators which will be forwarded to Crypto Asset Miners.
(3) In the event that the fees received by the Electronic Commerce Operator referred to in paragraph (1) are in the form of:

a. fiat money other than rupiah, the fiat money is converted into rupiah based on the exchange rate stipulated by the Minister; or
b. Crypto Assets, the Crypto Assets are converted into rupiah based on:
   1. the value set by the futures exchange administering Crypto Asset trading; or
   2. the value in the system owned by the Electronic Commerce Operator,

   that is applied consistently.

Article 352

(1) Electronic Commerce Operators as Taxable Persons referred to in Article 350 paragraph (2) are required to prepare Tax Invoices for supplies of Taxable Services referred to in Article 340 letter b.
(2) Invoices for supplies of the provision of Electronic Means services used to facilitate Crypto Asset trading transactions by Electronic Commerce Operators are determined as certain documents equivalent to the Tax Invoice.
(3) The Electronic Commerce Operators referred to in paragraph (1) are required to:
   a. remit the collected Value Added Tax referred to in Article 350 paragraph (1) using a Tax Payment Slip; and
   b. file the calculation and/or payment of Value Added Tax payable referred to in Article 340 letter b in Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(4) Electronic Commerce Operators that do not fulfil the provisions referred to in paragraph (1) and paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 353

(1) Value Added Tax on supplies of Crypto Asset transaction verification services and/or management services of a group of Crypto Asset miners (mining pool) by Crypto Assets Miners referred to in Article 340 letter c is collected by Crypto Assets Miners.
(2) Crypto Asset Miners referred to in paragraph (1) are entrepreneurs registered as Taxable Persons.

Article 354

(1) Value Added Tax payable referred to in Article 353 paragraph (1) is collected and remitted at a certain amount.
(2) The certain amount referred to in paragraph (1) is stipulated to amount to 10% (ten per cent) of the Value Added Tax rate as stipulated under Article 7 paragraph (1) of the Value Added Tax Law multiplied by the value in money of Crypto Assets received by Crypto Asset Miners, including Crypto Assets received from the Crypto Asset system (block reward).
(3) In the event that the fees received by Crypto Assets Miners for supplies of Crypto Assets in connection with transaction verification services and/or mining pool management services referred to in paragraph (2) are in the form of:

a. fiat money other than rupiah, the fiat money is converted into rupiah based on the exchange rate stipulated by the Minister; or
b. Crypto Assets, the Crypto Assets are converted into rupiah based on:
   1. the value set by the futures exchange administering Crypto Asset trading; or
   2. the value in the system owned by the Electronic Commerce Operator,

   that is applied consistently.

Article 355

(1) Crypto Asset Miners registered as Taxable Persons referred to in Article 353 paragraph (2) are required to prepare Tax Invoices for the supplies of Taxable Services referred to in Article 340 letter c.
(2) Crypto Asset Miners registered as Taxable Persons referred to in paragraph (1) are retailer Taxable Persons.
(3) Taxable Persons referred to in paragraph (2) may prepare Tax Invoice pursuant to statutory provisions stipulating Tax Invoices for supplies of Taxable Services to Service Recipients with the end consumer characteristics.
(4) Crypto Asset Miners referred to in paragraph (1) are required to:
   a. remit the collected Value Added Tax referred to in Article 354 paragraph (1) using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip; and
   b. file the calculation and/or payment of Value Added Tax payable referred to in Article 340 letter c in Periodic Value Added Tax Returns referred to in Article 162 paragraph (1) subparagraph a number 2.
(5) Crypto Asset Miners that do not fulfil the provisions referred to in paragraph (1) and paragraph (4) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 356

Income received or accrued by:
a. Crypto Assets Sellers;
b. Electronic Commerce Operators; or
c. Crypto Asset Miners,

in connection with Crypto Assets is subject to Income Tax.

Article 357

(1) Income received or accrued by Crypto Assets Sellers in connection with Crypto Assets transactions referred to in Article 356 letter a is an Income Tax object.
(2) Income in connection with Crypto Assets transactions referred to in paragraph (1) includes income from all types of Crypto Assets transaction, in the form of:
   a. transactions using fiat money payments;
   b. swap of Crypto Assets with other Crypto Assets; and/or

c. Crypto Asset transactions other than the transactions referred to in subparagraph a and subparagraph b,

conducted through the Electronic Means provided by Electronic Commerce Operators.

Article 358

(1) Income referred to in Article 357 paragraph (1) is subject to Article 22 Income Tax at a rate of 0.1% (zero point one per cent) of the value of the Crypto Asset transaction, excluding Value Added Tax and Sales Tax on Luxury Goods.
(2) Article 22 Income Tax referred to in paragraph (1) is final.
(3) The final Article 22 Income Tax referred to in paragraph (2) is collected, remitted and filed by Electronic Commerce Operators.
(4) In the event that the Electronic Commerce Operators referred to in paragraph (3) do not constitute Crypto Asset Physical Traders, the Article 22 Income Tax rate referred to in paragraph (1) amounts to 0.2% (zero point two per cent) which is final of the value of the Crypto Asset transaction.
(5) The transaction value referred to in paragraph (1) and paragraph (4) is:
    a. the value in money paid by the Crypto Asset Buyer, excluding Value Added Tax and Sales Tax on Luxury Goods, in the event the Crypto Asset transaction is conducted using payments in the form of fiat money;
    b. the value of each Crypto Asset supplied by the parties to the transaction, excluding Value Added Tax and Sales Tax on Luxury Goods, in the event that the Crypto Asset transaction is conducted using a swap of Crypto Assets with other Crypto Assets; or
    c. the amount of payment received by the Crypto Assets Seller, in the event that the Crypto Asset transaction is a transaction other than the transactions referred to in Article 357 paragraph (2) subparagraph a and subparagraph b.
(6) In the event that the value in money paid by the Crypto Asset Buyer referred to in paragraph (5) subparagraph a is in the form of fiat money other than rupiah, the value is converted into rupiah based on the exchange rate stipulated by the Minister on the date the payment is received.
(7) In the event that the Crypto Asset transaction is conducted using a swap as referred to in Article 357 paragraph (2) subparagraph b, the transaction value referred to in paragraph (5) subparagraph b amounts to the conversion value of Crypto Assets into rupiah based on:
    a. the value set by the futures exchange administering Crypto Asset trading; or
    b. the value in the system owned by the Electronic Commerce Operator,

    that is applied consistently.
(8) In the event that other income from the Crypto Asset transaction referred to in Article 357 paragraph (2) subparagraph c is received or accrued in currency other than rupiah, the income is converted into rupiah based on

the exchange rate stipulated by the Minister on the date income is received or accrued.

(9) Article 22 Income Tax referred to in paragraph (1) and paragraph (4) is collected at the time:
   a. of the payment referred to in Article 357 paragraph (2) subparagraph a from the Crypto Asset Buyer is received by the Electronic Commerce Operator;
   b. of the implementation of swap of Crypto Assets referred to in Article 357 paragraph (2) subparagraph b; and/or
   c. of the payment of income other than that referred to in Article 357 paragraph (2) subparagraph a and subparagraph b is received by the Electronic Commerce Operator.

(10) Electronic Commerce Operators are required to prepare Unified Withholding Tax/Collection Receipts for the Article 22 Income Tax collection referred to in paragraph (9).

(11) Unified Withholding Tax/Collection Receipts referred to in paragraph (10) may be in the form of Documents Equivalent to Unified Withholding Tax/Collection Receipts.

(12) Electronic Commerce Operators are required to remit Article 22 Income Tax that has been collected referred to in paragraph (9) no later than the 15th (fifteenth) of the following month after the Taxable Period ends.

(13) The remittance of Article 22 Income Tax referred to in paragraph (12) is conducted using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(14) Electronic Commerce Operators are required to file Article 22 Income Tax that has been collected and remitted by filing Unified Periodic Income Tax Returns no later than 20 (twenty) days after the Taxable Period ends.

Article 359

(1) Excluded from Electronic Commerce Operators required to collect Article 22 Income Tax referred to in Article 358 paragraph (3), are Electronic Commerce Operators that:
   a. only perform e-wallet services;
   b. only facilitate the meeting of Crypto Asset Sellers and Crypto Asset Buyers; and/or
   c. do not facilitate Crypto Asset trading transactions.

(2) The income referred to in Article 357 paragraph (1) received or accrued from Crypto Asset transactions through Electronic Means provided by the Electronic Commerce Operators referred to in paragraph (1) is subject to Article 22 Income Tax at a rate of:
   a. 0.1% (zero point one per cent) of the value of the Crypto Asset transaction, excluding Value Added Tax and Sales Tax on Luxury Goods, in the event that the Electronic Commerce Operators have obtained approval from the competent authority pursuant to statutory provisions stipulating commodity futures trading; or
   b. 0.2% (zero point two per cent) of the value of the Crypto Asset transaction, excluding Value Added Tax and Sales Tax on Luxury

Goods, in the event that the Electronic Commerce Operators do not obtain approval from the competent authority pursuant to statutory provisions stipulating commodity futures trading.

(3) Article 22 Income Tax referred to in paragraph (2) is final and must be self-remitted by Crypto Assets Sellers and filed through Unified Periodic Income Tax Returns.

(4) Income Tax referred to in paragraph (2) is remitted no later than the 15th (fifteenth) of the following month after the Taxable Period ends and filed no later than the 20th (twentieth) of the following month after the Taxable Period ends.

(5) Crypto Assets Sellers that do not fulfil the provisions referred to in paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 360

Excluded from the imposition of Article 22 Income Tax referred to in Article 21 paragraph (1), in the event that the Crypto Asset Seller:

a. is a non-resident taxpayer domiciled in countries that have entered into a Tax Treaty with Indonesia, whose taxing right on income referred to in Article 357 paragraph (1) does not lie with Indonesia; and

b. submits the Certificate of Domicile of Non-Resident Taxpayer of the Tax Treaty partner pursuant to statutory provisions in the field of taxation, to the Domestic Electronic Commerce Operator.

Article 361

Income from Crypto Asset transactions received or accrued by Electronic Commerce Operators acting on their own behalf conducted through Electronic Means provided by other Electronic Commerce Operators, is subject to Income Tax pursuant to the provisions referred to in Article 358.

Article 362

Electronic Commerce Operators that do not fulfil the provisions referred to in Article 358 paragraph (10), paragraph (12) and paragraph (14) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 363

(1) In the event that Foreign Electronic Commerce Operators are appointed as Other Parties as referred to in Article 348, the Electronic Commerce Operators concerned are also appointed as Income Tax collection agents referred to in Article 358 paragraph (9).

(2) Income Tax collection agents referred to in paragraph (1) are required to conduct:

a. the remittance of Income Tax that has been collected to the state treasury account pursuant to the provisions on electronic tax remittance referred to in Article 101; and

b. the filing of Income Tax that has been collected through Unified Periodic Income Tax Returns pursuant to the provisions on Tax Return referred to in Article 162.

(3) Income Tax collection agents that do not fulfil the provisions referred to in paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 364

(1) Income received or accrued by the Electronic Commerce Operators referred to in Article 356 letter b from the provision of Electronic Means used for Crypto Asset transactions is an Income Tax object.
(2) Income from the provision of Electronic Means used for Crypto Assets transactions referred to in paragraph (1) includes all fees received or accrued by the Electronic Commerce Operator, in the form of fees for:
    a. supplies of the provision of Electronic Means services used for Crypto Asset transactions;
    b. supplies of withdrawal services;
    c. supplies of deposit services;
    d. supplies of Crypto Asset transfer services between e-wallets;
    e. supplies of the provision and/or management services of Crypto Asset storage media or e-wallets; and/or
    f. supplies of other services in connection with Crypto Assets other than those referred to in subparagraph a to subparagraph e.
(3) Income from the provision of Electronic Means used for Crypto Asset transactions referred to in paragraph (2) is subject to Income Tax based on statutory rates pursuant to the provisions under the Income Tax Law.

Article 365

(1) Income received or accrued by Crypto Asset Miners in connection with Crypto Assets referred to in Article 356 letter c constitutes an Income Tax object.
(2) Income in connection with Crypto Assets referred to in paragraph (1) includes:
    a. income in the form of fees for services received or accrued by Crypto Asset Miners;
    b. income from the Crypto Asset system in the form of block rewards, fees for transaction verification services (transaction fees) or other income from the Crypto Asset system; and/or
    c. income other than the income referred to in subparagraph a and subparagraph b.

Article 366

(1) Income in connection with Crypto Assets referred to in Article 365 paragraph (2) is subject to Article 22 Income Tax at a rate of 0.1% (zero point one per cent) of income received or accrued by a Crypto Asset Miner, excluding Value Added Tax and Sales Tax on Luxury Goods.
(2) Income Tax referred to in paragraph (1) is final and must be self-remitted by Crypto Asset Miners as well as filed through Unified Periodic Income Tax Returns.

(3) In the event that the income referred to in paragraph (1) is in the form of Crypto Assets, such income must be converted into rupiah based on the value of the Crypto Assets at the time it is received or accrued, in the Electronic Commerce Operator's system selected by the Crypto Asset Miner based on:
   a. the value set by the futures exchange administering Crypto Asset trading; or
   b. the value in the system owned by the Electronic Commerce Operator selected by the Crypto Asset Miner,

   that is applied consistently.

(4) Crypto Asset Miners that do not fulfil the provisions referred to in paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 367

Income received or accrued by Crypto Asset Miners from Crypto Asset transactions conducted through Electronic Means provided by Electronic Commerce Operators, is subject to Income Tax pursuant to the provisions referred to in Article 358.

Article 368

Documents Equivalent to Unified Withholding Tax/Collection Receipts referred to in Article 344 paragraph (2) and Article 358 paragraph (11) at the minimum contain the following details:

a. the name and tax identification number of the Electronic Commerce Operator;
b. the name and tax identification number or National Identification Number of the party subject to the collection in the event that the Crypto Asset Seller and/or Crypto Asset Buyer constitutes a tax resident or non-tax resident in the form of a permanent establishment;
c. the name of the party subject to the collection in the event that the Crypto Asset Seller and/or Crypto Asset Buyer constitutes a non-tax resident;
d. the unique number of the transactions related to the income subject to the collection;
e. the tax base;
f. the Value Added Tax and Income Tax Rates;
g. the amount of collected Value Added Tax and Income Tax; and
h. the status of Unified Withholding Tax/Collection Receipts.

Article 369

Electronic Commerce Operators file Value Added Tax payable on supplies of Crypto Assets referred to in Article 342 paragraph (1) and submit the data and/or information listed in the statement of account/transaction of the Crypto Asset Sellers electronically to the Directorate General of Taxes.

Section Twenty-One
Procedures for the Exclusion from the Imposition of Income Tax on Dividends or Other Income

Article 370

(1) The exclusion from Income Tax objects for domestically-sourced Dividends received or accrued by resident individual Taxpayers is implemented by fulfilling:
   a. the criteria for the forms of investments, procedures for investments and investment period pursuant to statutory provisions on Income Tax; and
   b. the obligation to submit the investment realisation report.

(2) The exclusion from Income Tax objects for foreign-sourced Dividends received or accrued by resident individual Taxpayers and resident Corporate Taxpayers is implemented by fulfilling:
   a. the criteria for the forms of investments, procedures for investments and investment period pursuant to statutory provisions on Income Tax; and
   b. the obligation to submit the investment realisation report.

Article 371

The exclusion from Income Tax objects for other foreign-sourced income received or accrued by resident individual Taxpayers and resident Corporate Taxpayers is implemented by fulfilling:

a. the criteria for the forms of investments, procedures for investments and investment period pursuant to statutory provisions on Income Tax; and
b. the obligation to submit the investment realisation report.

Article 372

Dividends that do not fulfil the provisions referred to in Article 370 or other income that does not fulfil the provisions referred to in Article 371 shall be subject to Income Tax at the time the Dividends or other income is received or accrued.

Article 373

(1) Income Tax payable referred to in Article 372 on domestically-sourced Dividends, must be self-remitted by resident individual Taxpayers at rates pursuant to statutory provisions.

(2) Income Tax referred to in paragraph (1) is remitted no later than the 15th (fifteenth) of the following month after the Taxable Period Dividends received or accrued.

(3) Individual Taxpayers paying Income Tax payable referred to in paragraph (1) are required to file Unified Periodic Income Tax Returns.

(4) Taxpayers that do not fulfil the provisions referred to in paragraph (1), paragraph (2) and paragraph (3) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 374

(1) Taxpayers referred to in Article 370 and Article 371 must submit the investment realisation report.
(2) The submission of the report referred to in paragraph (1) is conducted electronically through the Taxpayer Portal.
(3) Taxpayers are required to submit the report referred to in paragraph (1):
    a. periodically no later than the end of the third month for individual Taxpayers or the end of the fourth month for Corporate Taxpayers after the Tax Year ends; and
    b. submitted until the third year from the Tax Year the Dividends or other income is received or accrued.
(4) Income Tax payable referred to in Article 372 on:
    a. the Dividends referred to in Article 370 paragraph (2); or
    b. other income referred to in Article 371,
    is calculated pursuant to the general provisions on Income Tax using the rates under Article 17 paragraph (1) of the Income Tax Law and filed in the Annual Income Tax Return for the Tax Year the Dividends or other income is received or accrued.

Section Twenty-Two
Procedures for Input VAT Crediting

Article 375

(1) Input VAT in a Taxable Period is credited against Output VAT in the same Taxable Period.
(2) For a Taxable Person that has conducted supplies of Taxable Goods, supplies of Taxable Services, exports of Taxable Goods and/or Exports of Taxable Services but in a Taxable Period, there are no supplies and/or exports concerned, the Input VAT in the Taxable Period concerned may be credited by the Taxable Person pursuant to statutory provisions in the field of taxation.
(3) Value Added Tax listed in a Tax Invoice that fulfils the provisions under Article 13 paragraph (5) and paragraph (9) of the Value Added Tax Law is Input VAT that may be credited by a Taxable Person in a Taxable Period from the time the Entrepreneur is registered as a Taxable Person pursuant to statutory provisions in the field of taxation.
(4) Value Added Tax listed in certain documents equivalent to the Tax Invoice that fulfil the provisions under Article 13 paragraph (6) and paragraph (9) of the Value Added Tax Law is Input VAT that may be credited by the Taxable Person in a Taxable Period from the time the Entrepreneur is registered as a Taxable Person pursuant to statutory provisions in the field of taxation.

Article 376

(1) The creditable input VAT referred to in Article 375 paragraph (1), listed in certain documents equivalent to the Tax Invoice, but has not been credited against the Output VAT in the same Taxable Period, may be credited in the

following Taxable Period no later than 3 (three) Taxable Periods after the end of the Taxable Period at the time the certain documents equivalent to the Tax Invoice are prepared.

(2) The creditable input VAT referred to in paragraph (1) must constitute Input VAT that has not been charged to expenses or has not been added (capitalised) to the acquisition cost of the Taxable Goods or Taxable Services and pursuant to statutory provisions in the field of taxation.

(3) Input VAT crediting in the following Taxable Period referred to in paragraph (1) is conducted by the Taxable Person through the filing or amendment of Periodic Value Added Tax Returns.

Article 377

(1) A Tax Invoice prepared by including the identity of the buyer of Taxable Goods or recipient of Taxable Services in the form of the name, address and National Identification Number for individual tax residents pursuant to statutory provisions is a Tax Invoice that fulfils the provisions under Article 13 paragraph (5) subparagraph b number 1 of the Value Added Tax Law.

(2) Value Added Tax listed in the Tax Invoice referred to in paragraph (1) constitutes input VAT that may be credited by the Taxable Person constituting the buyer of Taxable Goods or recipient of Taxable Services pursuant to statutory provisions in the field of taxation.

Article 378

(1) Input VAT on acquisitions of Taxable Goods and/or Taxable Services, imports of Taxable Goods as well as the utilisation of intangible Taxable Goods and/or the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory before the Entrepreneur is registered as a Taxable Person, may be credited by the Taxable Person.

(2) The provisions on Input VAT crediting referred to in paragraph (1) apply to the Taxable Periods before the Entrepreneur is registered as a Taxable Person, namely the Taxable Periods before the VAT registration listed in the VAT registration letter.

(3) Input VAT referred to in paragraph (1) is credited against Output VAT that should be collected by the Taxable Person for supplies of Taxable Goods and/or Taxable Services from the time the Entrepreneur should be registered as a Taxable Person pursuant to statutory provisions in the field of taxation until before the Entrepreneur concerned is registered as a Taxable Person.

(4) Input VAT referred to in paragraph (1) is calculated using Input VAT crediting guidelines of 80% (eighty per cent) of Output VAT that should be collected referred to in paragraph (3).

(5) Input VAT crediting guidelines referred to in paragraph (4) apply to the Taxable Periods before the Entrepreneur is registered as a Taxable Person, implemented through:
   a. the filing of Periodic Value Added Tax Returns; and/or
   b. the determination of Value Added Tax liabilities through Audits.

(6) Value Added Tax listed in the Tax Invoice and certain documents equivalent to the Tax Invoice for a Taxable Period before the Entrepreneur is registered as a Taxable Person, constitutes non-creditable Input VAT.
(7) To use the Input VAT crediting guidelines referred to in paragraph (4), a Taxable Person cannot use:
    a. other values as the tax base stipulated under Article 8A of the Value Added Tax Law; and
    b. the certain amount stipulated under Article 9A paragraph (1) of the Value Added Tax Law,

    to calculate Output VAT that should be collected on supplies of Taxable Goods and/or Taxable Services referred to in paragraph (3).
(8) Periodic Value Added Tax Returns referred to in paragraph (5) subparagraph a are Periodic Value Added Tax Returns for Taxable Persons that use the calculation guidelines for Input VAT crediting.
(9) Periodic Value Added Tax Returns referred to in paragraph (8) are filed by the Taxable Person from the time the Entrepreneur should be registered as a Taxable Person in:
    a. the last Taxable Period in the accounting year before the accounting year the Entrepreneur is registered as a Taxable Person, which includes Output VAT on supplies of Taxable Goods and/or Taxable Services for the accounting year period concerned; and/or
    b. the last Taxable Period before the Entrepreneur is registered as a Taxable Person in the accounting year the Entrepreneur is registered as a Taxable Person, which includes Output VAT on supplies of Taxable Goods and/or Taxable Services before the Entrepreneur is registered as a Taxable Person for the accounting year period concerned.

Article 379

(1) An Entrepreneur that does not prepare Tax Invoices for supplies of Taxable Goods and/or Taxable Services before the Entrepreneur is a registered as a Taxable Person does not fulfil the provisions stipulated under Article 14 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law and is not subject to administrative penalties stipulated under Article 14 paragraph (4) of the General Provisions and Tax Procedures Law.
(2) The Taxable Person referred to in Article 378 paragraph (3), is subject to administrative penalties in the form of:
    a. fines stipulated under Article 7 paragraph (1) of the General Provisions and Tax Procedures Law;
    b. interest stipulated under Article 9 paragraph (2a) of the General Provisions and Tax Procedures Law or Article 13 paragraph (2) of the General Provisions and Tax Procedures Law; and/or
    c. surcharges stipulated under Article 15 General Provisions and Tax Procedures Law.
(3) The calculation of administrative penalties referred to in paragraph (2) subparagraph b, is:

a. for interest stipulated under Article 9 paragraph (2a) of the General Provisions and Tax Procedures Law, is calculated from the payment due date for the Taxable Period referred to in Article 378 paragraph (9) until the date of payment and is imposed for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month; or
b. for interest stipulated under Article 13 paragraph (2) of the General Provisions and Tax Procedures Law, is calculated from the end of the Taxable Period referred to in Article 378 paragraph (9) until the issuance of the Notice of Tax Underpayment Assessment and is imposed for a maximum of 24 (twenty-four) months as well as a fraction of a month is treated as 1 (one) full month.

(4) Input VAT referred to in Article 378 paragraph (6) cannot be charged to expenses or added (capitalised) to the acquisition cost of the Taxable Goods or Taxable Services by Taxable Persons that credit Input VAT using Input VAT crediting guidelines referred to in Article 378 paragraph (4).
(5) In the event that the Input VAT referred to in paragraph (4) has been charged to expenses or has been added (capitalised) to the acquisition cost of Taxable Goods or Taxable Services:
a. the Taxable Person is required to amend the Annual Tax Return in the Tax Year at the time the Input VAT concerned has been charged to expenses or has been added (capitalised) to the acquisition cost of Taxable Goods or Taxable Services; or
b. the Director General of Taxes based on the application by the Taxable Person or *ex officio*, amends the assessment or decision pursuant to the provisions under Article 16 of the General Provisions and Tax Procedures Law.
(6) Taxable Persons that do not fulfil the provisions referred to in paragraph (5) subparagraph a are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 380

(1) VAT input on acquisitions of Taxable Goods and/or Taxable Services, imports of Taxable Goods as well as the utilisation of intangible Taxable Goods and/or the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory, that are not filed in Periodic Value Added Tax Returns notified and/or discovered at the time an Audit is conducted, may be credited by the Taxable Person pursuant to statutory provisions in the field of taxation.
(2) Input VAT that is not filed in Periodic Value Added Tax Returns notified and/or discovered at the time an Audit is conducted referred to in paragraph (1) is Value Added Tax listed in:
a. the Tax Invoice; and/or
b. certain documents equivalent to the Tax Invoice.
(3) Input VAT crediting referred to in paragraph (1) is conducted at the time of the Audit to be set off in the tax assessment that will be issued based on the documents referred to in paragraph (2) that:

a. are notified by the Taxable Person by showing and/or lending the documents concerned pursuant to the provisions under the Ministerial Regulation concerning procedures for Audits; and/or
b. are discovered by the Director General of Taxes.

(4) Input VAT crediting referred to in paragraph (1) may be conducted insofar as the notice of tax Audit findings has not been submitted to the Taxable Person.

Article 381

(1) Input VAT on acquisitions of Taxable Goods and/or Taxable Services, imports of Taxable Goods as well as the utilisation of intangible Taxable Goods and/or the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory, collected using the issuance of a tax assessment, may be credited by the Taxable Person in the principal amount of tax listed in the tax assessment, with the following provisions:
   a. the tax assessment concerned is the Notice of Tax Assessment issued only to collect Input VAT on acquisitions of Taxable Goods and/or Taxable Services, imports of Taxable Goods as well as the utilisation of intangible Taxable Goods and/or the utilisation of Taxable Services from outside the Customs Territory within the Customs Territory;
   b. the Taxable Person agrees to all Audit findings on the tax assessment;
   c. the amount of outstanding Value Added Tax includes the tax principal and penalties listed in the tax assessment has been settled;
   d. no legal remedy is pursued against the tax assessment; and
   e. pursuant to statutory provisions in the field of taxation.

(2) The settlement of the amount of outstanding Value Added Tax referred to in paragraph (1) subparagraph c is conducted by the Taxable Person using a Tax Payment Slip or other administrative means equivalent to the Tax Payment Slip.

(3) No legal remedy is pursued against the tax assessment referred to in paragraph (1) subparagraph d includes no application for the following is submitted:
   a. an objection stipulated under Article 25 of the General Provisions and Tax Procedures Law;
   b. an appeal stipulated under Article 27 of the General Provisions and Tax Procedures Law;
   c. the reduction or nullification of administrative penalties stipulated under Article 36 paragraph (1) subparagraph a General Provisions and Tax Procedures Law;
   d. the reduction or cancellation of tax assessments stipulated under Article 36 paragraph (1) subparagraph b of the General Provisions and Tax Procedures Law;
   e. the cancellation of tax Audit findings or tax assessments stipulated under Article 36 paragraph (1) subparagraph d of the General Provisions and Tax Procedures Law; and/or
   f. a civil review stipulated under statutory provisions stipulating the tax court.

(4) Included in no legal remedy is pursued referred to in paragraph (3) is no lawsuit is filed as stipulated under Article 23 of the General Provisions and Tax Procedures Law.
(5) The tax assessments attached with all Tax Payment Slips or other administrative means equivalent to the Tax Payment Slip for the settlement of the amount of outstanding Value Added Tax are certain documents equivalent to the Tax Invoice.
(6) Input VAT crediting referred to in paragraph (1) is conducted by filing certain documents equivalent to the Tax Invoice referred to in paragraph (5) in Periodic Value Added Tax Returns in the Taxable Period the tax assessments are settled or in the following Taxable Period no later than 3 (three) Taxable Periods after the end of the Taxable Period the tax assessments are settled.

Section Twenty-Three
Procedures for the Preparation of Tax Invoices and Procedures for the Amendment or Replacement of Tax Invoices

Article 382

(1) A Taxable Person is required to prepare a Tax Invoice for each:
   a. supply of Taxable Goods stipulated under Article 4 paragraph (1) subparagraph a, and/or Article 16D of the Value Added Tax Law;
   b. supply of Taxable Services stipulated under Article 4 paragraph (1) subparagraph c of the Value Added Tax Law;
   c. export of tangible Taxable Goods stipulated under Article 4 paragraph (1) subparagraph f of the Value Added Tax Law;
   d. export of intangible Taxable Goods stipulated under Article 4 paragraph (1) subparagraph g of the Value Added Tax Law; and/or
   e. export of Taxable Services stipulated under Article 4 paragraph (1) subparagraph h of the Value Added Tax Law.
(2) The Tax Invoice referred to in paragraph (1) must be prepared at:
   a. the time the Taxable Goods and/or Taxable Services are supplied;
   b. the time the payment is received in the event that the payment is received before the supply of Taxable Goods and/or before the supply of Taxable Services;
   c. the term payment is received in the event of a supply of a part of work phases;
   d. the time of the export of tangible Taxable Goods, export of intangible Taxable Goods and/or Export of Taxable Services; or
   e. other times stipulated pursuant to statutory provisions in the field of Value Added Tax.
(3) Taxable Persons that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 383

(1) Excluded from the provisions referred to in Article 382 paragraph (1), Taxable Persons may prepare 1 (one) Tax Invoice which includes all supplies conducted to the same buyer of Taxable Goods and/or recipient of Taxable Services for 1 (one) calendar month.
(2) The Tax Invoice referred to in paragraph (1) is referred to as a consolidated Tax Invoice.
(3) The consolidated Tax Invoice referred to in paragraph (2) must be prepared no later than the end of the month of the supply of Taxable Goods and/or supply of Taxable Services.

Article 384

(1) A Tax Invoice prepared by Taxable Persons past a period of 3 (three) months from the time the Tax Invoice should be prepared referred to in Article 382 paragraph (2) and Article 383 paragraph (3) is not treated as a Tax Invoice.
(2) Taxable Persons preparing the Tax Invoice referred to in paragraph (1) are deemed not to prepare a Tax Invoice.
(3) Taxable Persons referred to in paragraph (2) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.
(4) Value Added Tax listed in the Tax Invoice referred to in paragraph (1) is non-creditable Input VAT.

Article 385

(1) In a Tax Invoice, details concerning the supply of Taxable Goods and/or supply of Taxable Services must be listed which at the minimum contain:
    a. the name, address and Taxpayer Identification Number of the supplier of Taxable Goods or Taxable Services;
    b. the identity of the buyer of Taxable Goods or recipient of Taxable Services, including:
        1. the name, address and Taxpayer Identification Number, for resident Corporate Taxpayers and Government Agencies;
        2. the name, address and Taxpayer Identification Number or National Identification Number, for individual tax residents pursuant to statutory provisions;
        3. the name, address and passport number, for individual non-tax residents; or
        4. the name and address, for Corporate non-tax residents or non-tax subjects as stipulated under Article 3 of the Income Tax Law;
    c. the type of the goods or services, the amount of the selling price or Reimbursement and discount;
    d. the collected Value Added Tax;
    e. the collected Sales Tax on Luxury Goods;
    f. the code, serial number and the date of preparation of the Tax Invoice; and
    g. the name and signature of the party entitled to sign the Tax Invoice.

(2) The National Identification Number referred to in paragraph (1) subparagraph b number 2 is equivalent to the Taxpayer Identification Number in the context of the preparation of the Tax Invoice and Input VAT crediting.

Article 386

(1) The Tax Invoices referred to in Article 385 paragraph (1) and certain documents equivalent to the Tax Invoice for exports of intangible Taxable Goods and/or Export of Taxable Services:
   a. are in the electronic format;
   b. are prepared using a module in the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes; and
   c. a signature in the form of an Electronic Signature is listed.

(2) Excluded from the provisions referred to in paragraph (1), Tax Invoices for:
   a. supplies of Taxable Goods and/or Taxable Services to buyers of Taxable Goods and/or recipients of Taxable Services with end consumer characteristics, shall be prepared pursuant to the provisions stipulated under Article 13 paragraph (5a) of the Value Added Tax Law; and
   b. supplies of Taxable Goods, supplies of Taxable Services and/or exports of tangible Taxable Goods for which the Value Added Tax collection receipt is in the form of certain documents equivalent to the Tax Invoice, shall be prepared pursuant to the provisions stipulated under Article 13 paragraph (6) of the Value Added Tax Law.

Article 387

(1) The Tax Invoices referred to in Article 386 paragraph (1) must be:
   a. uploaded by the Taxable Person using a module in the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes; and
   b. approved by the Directorate General of Taxes.

(2) Tax Invoices in the electronic format that are not approved by the Directorate General of Taxes referred to in paragraph (1) subparagraph b do not constitute Tax Invoice.

(3) Value Added Tax listed in the Tax Invoice referred to in paragraph (2) constitutes non-creditable Input VAT.

(4) Taxable Persons that do not fulfil the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.

Article 388

Invoices issued by Taxable Persons are included in the definition of Tax Invoices referred to in Article 386 paragraph (1) insofar as:

a. the details referred to in Article 385 paragraph (1) are listed;

b. uploaded using a module in the Taxpayer Portal or other webpages integrated with the administration system of the Directorate General of Taxes; and
c. approved by the Directorate General of Taxes.

Article 389

(1) Taxable Persons may prepare a replacement Tax Invoice for the Tax Invoice referred to in Article 386 paragraph (1) if there is an error in the completion or writing of the Tax Invoice, thereby, it does not contain correct, complete and clear details.
(2) Taxable Persons must cancel the Tax Invoice that has been prepared for a supply of:
    a. Taxable Goods and/or Taxable Services whose transaction is cancelled; or
    b. goods and/or services for which a Tax Invoice should not be prepared.

Article 390

(1) In the event of force majeure resulting in a Taxable Person being unable to prepare Tax Invoices and certain documents equivalent to the Tax Invoice for exports of intangible Taxable Goods and/or Exports of Taxable Services in the electronic format referred to in Article 386 paragraph (1), the Taxable Person is allowed to prepare Tax Invoices and certain documents equivalent to the Tax Invoice for exports of intangible Taxable Goods and/or Export of Taxable Services not in the electronic format.
(2) The force majeure referred to in paragraph (1) is an event that occurs beyond human ability and cannot be avoided, thereby, an activity cannot be implemented or cannot be implemented as it should, which includes natural disasters, non-natural disasters and social disasters, determined by the Director General of Taxes.

Article 391

(1) Tax Invoices must be filled in correctly, completely and clearly.
(2) Taxable Persons that prepare Tax Invoices not pursuant to the provisions referred to in paragraph (1) are subject to penalties as stipulated under the General Provisions and Tax Procedures Law.
(3) Value Added Tax listed in the Tax Invoice referred to in paragraph (2) is non-creditable Input VAT.

CHAPTER VII
PROCEDURES FOR THE GRANTING OF TAX ADMINISTRATION SERVICES

Section One
The Use of Book Value for Transfers and Acquisitions of Assets in the Context of Mergers, Consolidations, Spin-Offs or Acquisitions

Article 392

(1) Taxpayers shall use the market value for transfers of assets in the context of mergers, consolidations, spin-offs or acquisitions.
(2) To apply provisions in the field of Income Tax, Taxpayers may use book value for transfers of assets in the context of mergers, consolidations, spin-offs or acquisitions, after obtaining approval from the Director General of Taxes.
(3) Mergers that may use book value referred to in paragraph referred to in paragraph (2) are:
    a. a merger between 2 (two) or more resident Corporate Taxpayers with share capital by transferring all assets and liabilities to one of the corporate Taxpayers that has no residual tax losses or has lower residual tax losses and dissolving the corporate Taxpayer that transfers the said assets and liabilities; or
    b. a merger between a legal entity established or domiciled overseas and a resident Corporate Taxpayer with share capital, by transferring all assets and liabilities of the legal entity established or domiciled overseas to the resident Corporate Taxpayer with share capital and dissolving the legal entity established or domiciled overseas that transfers the said assets and liabilities.
(4) Consolidations that may use book value referred to in paragraph (2) are:
    a. a consolidation of 2 (two) or more resident Corporate Taxpayers with share capital by establishing a new business entity in Indonesia and transferring all assets and liabilities to the new Corporate Taxpayer and dissolving the consolidated Corporate Taxpayers; or
    b. a consolidation between a legal entity established or domiciled overseas and a resident Corporate Taxpayer with share capital, by establishing a new business entity in Indonesia and transferring all assets and liabilities to the new business entity and dissolving the legal entity established or domiciled overseas and the consolidated resident Corporate Taxpayers.
(5) Spin-offs that may use book value referred to in paragraph (2) are:
    a. a split-off of 1 (one) resident Corporate Taxpayer with share capital into 2 (two) resident Corporate Taxpayers or more by incorporating a new business entity and transferring part of assets and liabilities to the new business entity, conducted without liquidating the former business entity;
    b. a split-off of 1 (one) resident Corporate Taxpayer with share capital by transferring part of assets and liabilities to 1 (one) or more resident Corporate Taxpayers with share capital, conducted without

incorporating a new business entity and without liquidating the former business entity and constituting a split-off as stipulated under statutory provisions in the field of Value Added Tax; or

c. a series of actions to split off of 2 (two) or more resident Corporate Taxpayers with share capital by transferring part of assets and liabilities of the split-off business and merging the split-off business into 1 (one) business entity without liquidating the former business entity.

(6) Taxpayers that may conduct spin-offs using book value referred to in paragraph (5) are:
   a. Taxpayers that have not Gone Public intending to conduct an initial public offering;
   b. Taxpayers that have Gone Public insofar as all business entities resulting from the spin-off conduct an initial public offering;
   c. Corporate Taxpayers splitting off sharia business units to conduct the split-off obligation pursuant to statutory provisions;
   d. resident Corporate Taxpayers insofar as business entities resulting from the spin-off obtain additional capital from foreign investors of a minimum of IDR500,000,000,000.00 (five hundred billion rupiah); or
   e. State-Owned Enterprise Corporate Taxpayers that receive additional capital participation from the State of the Republic of Indonesia, insofar as the spin-off is conducted related to the incorporation of a holding company of a State-Owned Enterprise.

(7) Taxpayers that may use book value in the context of spin-offs referred to in paragraph (5) subparagraph b and subparagraph c, are:
   a. State-Owned Enterprise Corporate Taxpayers that receive additional capital participation from the State of the Republic of Indonesia, insofar as the spin-off is conducted related to the incorporation of a holding company of a State-Owned Enterprise; or
   b. Corporate Taxpayers conducting split-offs in connection with the restructuring of State-Owned Enterprises provided that:
      1. the restructuring is conducted no later than from the beginning of the 2021 Tax Year;
      2. the assets are not transferred by purchasing and selling or exchanging assets; and
      3. the restructuring as well as transfer of assets have obtained approval from the minister who administers governmental affairs in the field of State-Owned Enterprise development.

(8) Acquisitions that may use book value referred to in paragraph (2) are:
   a. an acquisition of a permanent establishment that conducts a banking business conducted by transferring all or part of the assets and liabilities of the permanent establishment to a resident Corporate Taxpayer with share capital and dissolving the said permanent establishment; or
   b. an acquisition of a resident Corporate Taxpayer by transferring the shareholding of the resident Corporate Taxpayer to another resident

Corporate Taxpayer, conducted in connection with the restructuring of a State-Owned Enterprise, provided that:

1. the transferred shareholding of the resident Corporate Taxpayer:
   a) is more than 50% (fifty per cent) of all shares with fully paid-up voting shares; or
   b) has the ability to determine, either directly or indirectly, in any manner, the management and/or policy of the transferred resident Corporate Taxpayer;
2. in the event that the acquired resident Corporate Taxpayer is in the form of a public company, it must comply with the provisions stipulated under statutory provisions in the field of capital market;
3. the restructuring is conducted no later than from the beginning of the 2021 Tax Year;
4. the assets are not transferred by purchasing and selling or exchanging assets; and
5. the restructuring as well as transfer of assets have obtained approval from the minister who administers governmental affairs in the field of State-Owned Enterprise development.

Article 393

(1) Taxpayers that transfer or receive transfers of assets in the context of mergers, consolidations, spin-offs or acquisitions using book value referred to in Article 392 paragraph (2) are required to fulfil the following requirements:
   a. submitting an application to the Director General of Taxes no later than 6 (six) months after the effective date of the merger, consolidation, spin-off or acquisition, attaching the reasons and purpose for conducting the merger, consolidation, spin-off or acquisition;
   b. fulfilling the business purpose test requirements; and
   c. fulfilling the requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate, for each related resident Corporate Taxpayer and permanent establishment.

(2) The business purpose test requirements referred to in paragraph (1) subparagraph b are fulfilled if:
   a. the main purpose of the merger, consolidation, spin-off or acquisition is to establish robust business synergies and strengthen the capital structure and not conducted for tax avoidance;
   b. the business of the Taxpayer transferring the assets remains ongoing until the effective date of the merger, consolidation, spin-off or acquisition;
   c. the business of the Taxpayer transferring the assets before the merger, consolidation or acquisition of business occurs, must be continued by the Taxpayer receiving the transfer of assets for a

minimum of 5 (five) years after the effective date of the merger, consolidation or acquisition;

d. the business of the Taxpayer receiving the assets in the context of the merger, consolidation, spin-off or acquisition continues for a minimum of 5 (five) years after the effective date of the merger, consolidation, spin-off or acquisition; and

e. assets in the form of fixed assets owned by the Taxpayer receiving the assets originating from the merger, consolidation, spin-off or acquisition are not transferred by the Taxpayer receiving the assets for a minimum of 2 (two) years after the effective date of the merger, consolidation, spin-off or acquisition unless the transfer is conducted to increase company efficiency.

(3) Assets for which the application to use book value may be submitted are assets that had been transferred on the effective date of the merger, consolidation, spin-off or acquisition.

(4) The book value referred to in paragraph (3) is the book value on the effective date of the merger, consolidation, spin-off or acquisition.

Article 394

(1) The application referred to in Article 393 paragraph (1) subparagraph a is submitted by:

a. the Taxpayer receiving the assets, for the merger referred to in Article 392 paragraph (3), the consolidation referred to in Article 392 paragraph (4) or the acquisition referred to in Article 393 paragraph (8) subparagraph a; or

b. the Taxpayer transferring the assets for the spin-off referred to in Article 392 paragraph (5) or the acquisition referred to in Article 392 paragraph (8) subparagraph b.

(2) The application submitted by the Taxpayer referred to in paragraph (1) must be complemented by the following documents:

a. a statement letter outlining the reasons and purpose for conducting the merger, consolidation, spin-off or acquisition; and

b. a statement letter explaining that the merger, consolidation, spin-off or acquisition fulfils the business purpose test requirements referred to in Article 393 paragraph (2).

(3) The application submitted by the Taxpayer referred to in Article 392 paragraph (6) subparagraph d in addition to being attached with the documents referred to in paragraph (2), must also be complemented by:

a. the deed of incorporation or deed amendment of the Taxpayer resulting from the spin-off listing the amount of new Investments from foreign investors; and

b. the proof of realisation or additional paid-in capital in the deed incorporation or deed of amendment.

(4) The application submitted by the Taxpayer referred to in Article 392 paragraph (6) subparagraph e and Article 392 paragraph (7) subparagraph a, in addition to being attached with the documents referred to in paragraph (2), must also be complemented by an approval letter from

the minister who administers governmental affairs in the field of State-Owned Enterprise development.

(5) The application submitted by the Taxpayer referred to in Article 392 paragraph (7) subparagraph b or submitted by the Taxpayer conducting the acquisition referred to in Article 392 paragraph (8) subparagraph b, in addition to being attached with the documents referred to in paragraph (2), must also be complemented by:
   a. the approval letter from the minister who administers governmental affairs in the field of State-Owned Enterprise development; and
   b. the deed of split-off or acquisition.

(6) The application by the Taxpayer referred to in paragraph (1) must be complemented by the supporting documents for the statement letters referred to in paragraph (2) subparagraph a and subparagraph b.

(7) In the event that the application by the Taxpayer is not complemented by the documents referred to in paragraph (2), paragraph (3), paragraph (4), paragraph (5) and/or the supporting documents referred to in paragraph (6), the Director General of Taxes submits the request letter for completeness to the Taxpayer no later than 15 (fifteen) business days from the time the application is received.

(8) The request for completeness referred to in paragraph (7) must be fulfilled by the Taxpayer concerned in a maximum period of 15 (fifteen) business days from the time the request letter for completeness is received.

(9) In the event that the Taxpayer does not fulfil the request for completeness within the period referred to in paragraph (8), the Director General of Taxes submits the notice stating that the application by the Taxpayer is not considered and the decision letter is not issued.

(10) For the application by the Taxpayer that is not considered referred to in paragraph (9), the Taxpayer may completely re-submit the application referred to in paragraph (2), paragraph (3), paragraph (4), paragraph (5) and paragraph (6) by taking into account the submission period for the application referred to in Article 393 paragraph (1) subparagraph a.

Article 395

(1) For the application referred to in Article 394, the Director General of Taxes issues the decision on approval or rejection of the application, no later than 1 (one) month from the time the application by the Taxpayer is completely received.

(2) If within the period referred to in paragraph (1), the Director General of Taxes has not issued a decision, the application by the Taxpayer is deemed approved.

(3) For the application that is deemed approved referred to in paragraph (2), the Director General of Taxes within a maximum period of 5 (five) business days from the time the period of 1 (one) month referred to in paragraph (1) has elapsed, must issue the decision on the approval of the use of book value in the context of the merger, consolidations, spin-offs or acquisitions.

Article 396

(1) The Taxpayer that has transferred assets to increase company efficiency referred to in Article 393 paragraph (2) subparagraph e, must apply to the Director General of Taxes no later than in a period of 1 (one) month after the transfer of assets occurs.

(2) The application referred to in paragraph (1) must be complemented by the following documents:
   a. a statement letter outlining that the assets are eligible to be transferred to increase company efficiency; and
   b. details of the transferred assets, complemented by data with information that at the minimum contains:
      1. the names of the assets;
      2. the date of acquisition of the assets;
      3. the acquisition value of the assets;
      4. the book value of the assets at the time of merger, consolidation, spin-off or acquisition;
      5. the book value, selling value and market value of the assets at the time the assets are transferred; and
      6. the name and Taxpayer Identification Number of the transferee of the assets.

(3) The Statement Letter referred to in paragraph (2) subparagraph a must be complemented by supporting documents.

(4) In the event that the application by the Taxpayer is not complemented by the documents and supporting documents referred to in paragraph (2) and paragraph (3), the Director General of Taxes submits a request letter for completeness to the Taxpayer no later than 15 (fifteen) business days from the time the application is received.

(5) The request for completeness referred to in paragraph (4) must be fulfilled by the Taxpayer concerned within a maximum period of 5 (five) business days from the time the request letter for completeness is received.

(6) In the event that the Taxpayer does not submit the completeness within the period referred to in paragraph (5), the Director General of Taxes submits the notice stating that the application by the Taxpayer is not considered and the decision letter is not issued.

(7) For the application by the Taxpayer that is not considered referred to in paragraph (6), the Taxpayer may completely re-submit the application referred to in paragraph (2) and paragraph (3).

Article 397

(1) The Director General of Taxes issues the decision on the approval or rejection of the application by the Taxpayer referred to in Article 396 paragraph (1), no later than 1 (one) month from the date the application is completely received.

(2) If within the period referred to in paragraph (1), the Director General of Taxes has not issued a decision, the application by the Taxpayer is deemed approved.

(3) For the application that is deemed approved referred to in paragraph (2), within a maximum period of 5 (five) business days from the time the period of 1 (one) month referred to in paragraph (1) has elapsed, the Director General of Taxes must issue the decision on the approval of the application by the Taxpayer to transfer to increase company efficiency.

Article 398

(1) The Taxpayers referred to in Article 392 paragraph (6) subparagraph a and subparagraph b that intend to sell their shares on the stock exchange, within a maximum period of 2 (two) years from the time they obtain approval from the Director General of Taxes to conduct spin-offs using book value must have submitted a registration statement to the Financial Services Authority for the initial public offering and the registration statement has become effective.
(2) In the event of circumstances beyond the Taxpayers' control resulting in the non-fulfilment of the period referred to in paragraph (1), the Taxpayer may apply for an extension of the period to the Director General of Taxes through the Taxpayer Portal.
(3) The application for an extension of the period referred to in paragraph (2) must be submitted no later than 1 (one) month before the period referred to in paragraph (1) ends.
(4) The extension of the period referred to in paragraph (2) is granted for a maximum period of 2 (two) years from the time the period referred to in paragraph (1) ends.
(5) The application by the Taxpayer referred to in paragraph (2) must be complemented by the following documents:
    a. an explanation letter of the postponement of the initial public offering by providing complete and detailed reasons; and
    b. an explanation letter of the assets owned by the company resulting from the spin-off from the effective date of the spin-off until the last month before the submission of the application for an extension of the period by the Taxpayer.
(6) The explanation letter concerning the postponement of the initial public offering referred to in paragraph (5) paragraph a must be complemented by supporting documents.
(7) In the event that the application by the Taxpayer is not complemented by the documents and supporting documents referred to in paragraph (5) and paragraph (6), the Director General of Taxes submits the request letter for completeness no later than 15 (fifteen) business days from the time the application is received.
(8) The request for completeness referred to in paragraph (7) must be fulfilled by the Taxpayer concerned within a maximum period of 5 (five) business days from the time the request letter for completeness is received from the Director General of Taxes.
(9) In the event that the Taxpayer does not submit the completeness within the period referred to in paragraph (8), the Director General of Taxes

submits the notice stating that the application by the Taxpayer is not considered and the decision letter is not issued.

(10) For the application by the Taxpayer that is not considered referred to in paragraph (9), the Taxpayer may completely re-submit the application referred to in paragraph (5) and paragraph (6) by taking into account the submission period for the application referred to in paragraph (3).

Article 399

(1) The Director General of Taxes issues the decision on the approval or rejection of the application by the Taxpayer referred to in Article 398 paragraph (3), no later than 1 (one) month from the date the application is completely received.

(2) If within the period referred to in paragraph (1), the Director General of Taxes has not issued a decision, the application by the Taxpayer is deemed approved.

(3) For the application that is deemed approved referred to in paragraph (2), within a maximum period of 5 (five) business days from the time the period of 1 (one) month referred to in paragraph (1) has elapsed, the Director General of Taxes must issue the decision on approval.

Article 400

(1) The permanent establishment Taxpayers referred to in Article 392 paragraph (8) within a maximum period of 2 (two) years from the effective date of the transfer of assets must dissolve the business activities by obtaining a revocation decision letter for the banking business permit issued by the Financial Services Authority.

(2) In the event that there are circumstances beyond the Taxpayer's control, the period referred to in paragraph (1) may be extended by an additional period of a maximum of 1 (one) year, after obtaining the approval from the Director General of Taxes.

(3) Taxpayers extending the period referred to in paragraph (2), must:
   a. have applied for the revocation of business permit to the Financial Services Authority before the period referred to in paragraph (1) ends; and
   b. apply to the Director General of Taxes through the Taxpayer Portal no later than 1 (one) month before the period referred to in paragraph (1) ends.

(4) The application referred to in paragraph (3) subparagraph b must be complemented by documents in the form of:
   a. proof of having applied for the preparation of revocation of the business permit referred to in paragraph (3) subparagraph a; and
   b. an explanation letter that the business activities have not been dissolved by providing complete and detailed reasons as well as supporting documents concerning the existence of circumstances beyond the Taxpayers' control resulting in the inability to dissolve the business within a period of 2 (two) years.

(5) In the event that the application by the Taxpayer is not complemented by the documents and/or supporting documents referred to in paragraph (4), the Director General of Taxes submits the request letter for completeness no later than 15 (fifteen) business days from the time the application is received.
(6) The request for completeness referred to in paragraph (5) must be fulfilled by the Taxpayer concerned within a maximum period of 5 (five) business days from the time the request letter for completeness from the Director General of Taxes is received.
(7) In the event that the Taxpayer does not submit the completeness within the period referred to in paragraph (6), the Director General of Taxes submits the notice stating that the application by the Taxpayer is not considered and the decision letter is not issued.
(8) For the application by the Taxpayer that is not considered referred to in paragraph (7), the Taxpayer may completely re-submit the application referred to in paragraph (4) by taking into account the submission period for the application referred to in paragraph (3) subparagraph b.

Article 401

(1) The Director General of Taxes issues the decision on the approval or rejection of the application by the Taxpayer referred to in Article 400 paragraph (3) subparagraph b, no later than 1 (one) month from the date the application is completely received.
(2) If within the period referred to in paragraph (1), the Director General of Taxes has not issued a decision, the application by the Taxpayer is deemed approved.
(3) For the application that is deemed approved referred to in paragraph (2), in a maximum period of 5 (five) business days from the time the period of 1 (one) month referred to in paragraph (1) has elapsed, the Director General of Taxes must issue the decision on approval.

Article 402

(1) The Taxpayer receiving assets using the book value referred to in Article 392 paragraph (2), cannot carry forward losses/residual losses of the Corporate Taxpayer, permanent establishment or legal entity incorporated or domiciled overseas transferring assets in the context of the merger, consolidation or acquisition.
(2) The resident Taxpayer receiving assets in the context of a merger as referred to in Article 392 paragraph (3) subparagraph b or consolidation as referred to in Article 392 paragraph (4) subparagraph b, cannot charge taxes and/or other levies payable overseas of the legal entity incorporated or domiciled overseas transferring assets.

Article 403

(1) The Taxpayer receiving the transfer of assets in the context of mergers, consolidations, spin-offs or acquisitions as referred to in Article 392

paragraph (2) shall record the acquisition value of the assets according to the book value stated in the transferor's Bookkeeping.

(2) The book value referred to in paragraph (1) is:
   a. the acquisition value less accumulated depreciation or accumulated amortisation, for assets subject to depreciation or amortisation; or
   b. the acquisition value for assets not subject to depreciation or amortisation.

(3) The depreciation or amortisation of the received assets referred to in paragraph (2) shall be conducted based on the remaining useful life stated in the transferor's Bookkeeping.

(4) In the event that there are debts and receivables between the Taxpayer transferring the assets and the Taxpayer receiving the transfer of assets in the context of a merger, consolidation or acquisition, the recording shall be conducted by offset as well as no income is recognised from the write-off of debts and costs for the receivable write-off.

Article 404

(1) In the event that a merger, consolidation or acquisition is conducted in the current Tax Year, the amount of Article 25 Income Tax instalments of the Taxpayer receiving the assets after a merger, consolidation or acquisition is not lower than the sum of the Article 25 Income Tax instalments of all Taxpayers concerned before the merger, consolidation or acquisition.

(2) In the event that a spin-off is conducted in the current Tax Year, the amount of Article 25 Income Tax instalments of all Taxpayers after the spin-off is not lower than the Article 25 Income Tax instalments of the Taxpayers concerned before the spin-off.

(3) The provisions on the amount of Article 25 Income Tax instalments referred to in paragraph (1) and paragraph (2) shall apply until the obligation to file the Annual Tax Return is submitted for the Tax Year or Fraction of a Tax Year in which the merger, consolidation, spin-off or acquisition is conducted.

(4) In the event that a Taxpayer after conducting a merger, consolidation, spin-off or acquisition experiences an increase in business, thereby, the Article 25 Income Tax instalments should increase, the amount of Article 25 Income Tax instalments referred to in paragraph (1) and paragraph (2) shall be recalculated pursuant to applicable provisions.

(5) Article 25 Income Tax Instalments referred to in paragraph (1) and paragraph (2) constitute Income Tax instalments stipulated under Article 25 of the Income Tax Law.

(6) The settlement of Income Tax for the current Tax Year through payments, Withholding Tax and/or Income Tax collection before the merger, consolidation, spin-off or acquisition of the Resident corporate Taxpayer and permanent establishment transferring the assets, may be overbooked into the settlement of Income Tax in the current year of the transferee Taxpayer.

Article 405

(1) In the event that after obtaining approval from the Director General of Taxes to use the book value referred to in Article 393 paragraph (1), it is known that the Taxpayer:
   a. does not fulfil the business purpose test requirements referred to in Article 393 paragraph (1) subparagraph b;
   b. conducts a transfer of assets, but does not apply for the transfer of assets within the period referred to in Article 396 paragraph (1);
   c. obtains rejection of the transfer of assets from the Director General of Taxes referred to in Article 397 paragraph (1) and the said assets have been transferred;
   d. does not submit a registration statement to the Financial Services Authority in the context of the Initial Public Offering or the registration statement has not become effective within the period referred to in Article 398 paragraph (1) or paragraph (2);
   e. obtains rejection of the extension of the Initial Public Offering period referred to in Article 399 paragraph (1);
   f. does not dissolve the permanent establishment within the period referred to in Article 400 paragraph (1) or paragraph (2); and/or
   g. obtains rejection of the extension of the dissolution period of the permanent establishment referred to in Article 401 paragraph (1),

   the asset transfer value in the context of the merger, consolidation, spin-off or acquisition based on book value shall be recalculated based on market value at the time of the transfer of assets on the effective date of the merger, consolidation, spin-off or acquisition.
(2) For the Taxpayer referred to in paragraph (1), the Directorate General of Taxes shall:
   a. issue a revocation decision letter for the approval of the use of book value decision letter referred to in Article 395; and
   b. recalculate the asset transfer value based on market value to determine Income Tax payable.
(3) Income Tax payable referred to in paragraph (2) subparagraph b shall be borne by:
   a. the Taxpayer receiving the assets, in the event that the assets are transferred in the context of a merger, consolidation or acquisition; or
   b. the Taxpayer transferring the assets, in the event that the assets are transferred in the context of a spin-off.

Article 406

(1) The tax rights and obligations of the Taxpayer transferring the assets in the context of a merger, consolidation or acquisition for a Taxable Period, Fraction of a Tax Year and/or the Tax Year prior to:
   a. the merger referred to in Article 392 paragraph (3);
   b. the consolidation referred to in Article 392 paragraph (4); or
   c. the dissolution of the permanent establishment referred to in Article 400 paragraph (1) or (2),

shall shift to the Taxpayer receiving the transfer of assets in the context of the merger, consolidation or acquisition.

(2) The application referred to in Article 393 paragraph (1) subparagraph a, Article 396 paragraph (1), Article 398 paragraph (2) and Article 400 paragraph (3) subparagraph b is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.

Section Two
Income Tax Facilities for Investments in Certain Business Sectors and/or in Certain Regions

Article 407

Resident corporate Taxpayers performing Investments, both new Investments and the spin-off of the existing business, in:

a. Certain Business Sectors listed in Appendix I of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions; and/or
b. Certain Business Sectors and in Certain Regions listed in Appendix II of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions,

and fulfil the criteria and certain requirements, may be granted Income Tax facilities.

Article 408

(1) Income Tax Facilities referred to in Article 407 are in the form of:
   a. the net income reduction of 30% (thirty per cent) of the total Investment value in the form of tangible fixed assets, including land, used for the Main Business Activity, expensed for 6 (six) years respectively of 5% (five per cent) per year;
   b. accelerated depreciation of tangible fixed assets and accelerated amortisation of intangible assets acquired in the context of Investments, with useful lives and depreciation rates as well as amortisation rates determined as follows:
      1. for accelerated depreciation of tangible fixed assets:
         a) Group I non-buildings, the useful life becomes 2 (two) years, with a depreciation rate based on the straight-line method of 50% (fifty per cent) or a depreciation rate based on the declining balance method of 100% (one hundred per cent) charged all at once;
         b) Group II non-buildings, the useful life becomes 4 (four) years, with a depreciation rate based on the straight-line method of 25% (twenty-five per cent) or a depreciation rate based on the declining balance method of 50% (fifty per cent);
         c) Group III non-buildings, the useful life becomes 8 (eight) years, with a depreciation rate based on the straight-line

method of 12.5% (twelve point five per cent) or a depreciation rate based on the declining balance method of 25% (twenty-five per cent);

d) Group IV non-buildings, the useful life becomes 10 (ten) years, with a depreciation rate based on the straight-line method of 10% (ten per cent) or a depreciation rate based on the declining balance method of 20% (twenty per cent);

e) permanent buildings, the useful life becomes 10 (ten) years, with a depreciation rate based on the straight-line method of 10% (ten per cent); and

f) non-permanent buildings, the useful life becomes 5 (five) years, with a depreciation rate based on the straight-line method of 20% (twenty per cent).

2. for accelerated amortisation of intangible assets:

a) Group I, the useful life becomes 2 (two) years, with an amortisation rate based on the straight-line method of 50% (fifty per cent) or an amortisation rate based on the declining balance method of 100% (one hundred per cent) charged all at once;

b) Group II, the useful life becomes 4 (four) years, with an amortisation rate based on the straight-line method of 25% (twenty-five per cent) or an amortisation rate based on the declining balance method of 50% (fifty per cent);

c) Group III, the useful life becomes 8 (eight) years, with an amortisation rate based on the straight-line method of 12.5% (twelve point five per cent) or an amortisation rate based on the declining balance method of 25% (twenty-five per cent); and

d) Group IV, the useful life becomes 10 (ten) years, with an amortisation rate based on the straight-line method of 10% (ten per cent) or an amortisation rate based on the declining balance method of 20% (twenty per cent).

c. the imposition of Income Tax on dividends paid to non-resident Taxpayers other than permanent establishments in Indonesia of 10% (ten per cent) or a lower rate according to the applicable tax treaty; and

d. a loss carry-forward longer than 5 (five) years but not more than 10 (ten) years, with the following provisions:

1. an additional 1 (one) year for the Investment referred to in Article 407 by the Taxpayer;
2. an additional 1 (one) year if the Investment referred to in Article 407 is performed in an industrial area and/or a bonded zone;
3. an additional 1 (one) year if the Investment referred to in Article 407 is performed in the new and renewable energy sector;
4. an additional 1 (one) year if incurring costs for economic and/or social infrastructure at the business location of a minimum of IDR10,000,000,000,00 (ten billion rupiah);

5. an additional 1 (one) year if using raw materials and/or components produced domestically of a minimum of 70% (seventy per cent) no later than the 2nd (second) tax year;
6. additional 1 (one) year or 2 (two) years:
   a) an additional 1 (one) year if adding a minimum of 300 (three hundred) Indonesian workers and maintaining that number for 4 (four) consecutive years; or
   b) an additional 2 (two) years if adding a minimum of 600 (six hundred) Indonesian workers and maintaining that number for 4 (four) consecutive years;
7. an additional 2 (two) years if incurring research and development costs domestically in the context of product development or production efficiency of a minimum of 5% (five per cent) of the total Investments within a period of 5 (five) years; and/or
8. an additional 2 (two) years if exporting a minimum of 30% (thirty per cent) of the total sales value in a Tax Year, for Investments in the business sectors stipulated under Article 407 letter a performed outside the bonded zone.

(2) Income Tax Facilities referred to in paragraph (1) subparagraph b are granted to tangible fixed assets and/or intangible assets owned and used for the Main Business Activity.

(3) In the event that Taxpayers fulfil part or all of the requirements referred to in paragraph (1) subparagraph d, the Taxpayers concerned may obtain an additional loss carry-forward period for a maximum period of 5 (five) years.

Article 409

(1) Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph a are granted to tangible fixed assets, including land, with the following provisions:
   a. acquired by the Taxpayers in a new condition, unless it is a relocation as a whole as an Investment package from another country;
   b. listed in the principle permit, investment permit, Investment registration, issued by the Indonesian Investment Coordinating Board/Provincial One-Stop Integrated Service and Investment Services/Regency/Municipal One-Stop Integrated Service and Investment Services or Business Licensing issued by the Online Single Submission Institution which constitutes the basis for the granting of Income Tax facilities; and
   c. owned and used for the Main Business Activity.

(2) In addition to fulfilling the provisions referred to in paragraph (1), for tangible fixed assets other than land, the tangible fixed assets must be acquired after the principle permit, investment permit, investment registration or Business Licensing is issued by the Online Single Submission Institution.

(3) The tangible fixed assets used for the Main Business Activity referred to in paragraph (1) subparagraph c also include main supporting tangible fixed assets that are directly related to the Main Business Activity concerned.
(4) Not included in assets that may be granted Income Tax facilities referred to in paragraph (1) are tangible fixed assets acquired through operating lease or financial lease before the option rights to the assets are performed.

Article 410

The value of tangible fixed assets constituting the basis for the calculation of the net income reduction facility referred to in Article 408 paragraph (1) subparagraph a is stipulated by the Minister.

Article 411

(1) The conformity of the fulfilment of:
    a. Certain Business Sectors pursuant to Appendix I or Certain Business Sectors and in Certain Regions pursuant to Appendix II of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions; and
    b. the criteria and requirements stipulated under Article 2 of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions,

    is determined through the Online Single Submission System.
(2) In the event that the Investment of a Taxpayer:
    a. fulfils the provisions referred to in paragraph (1), the Online Single Submission System notifies the Taxpayer that the Investment fulfils the provisions to obtain Income Tax facilities; or
    b. does not fulfil the provisions referred to in paragraph (1), the Online Single Submission System notifies the Taxpayer that the Investment does not obtain Income Tax facilities.
(3) The Taxpayer that has obtained the notification referred to in paragraph (2) subparagraph a is deemed to have applied online through the Income Tax facility Online Single Submission System if:
    a. the shareholders fulfil the requirements to be granted the Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate; and
    b. has submitted the completeness requirements in the form of a softcopy of the details of fixed assets in the Investment value plan.
(4) The application for Income Tax facilities referred to in paragraph (3) must be submitted before the Start of Commercial Production.
(5) The application for Income Tax facilities referred to in paragraph (3) is submitted:
    a. simultaneously with the registration to obtain a business identification number for new Taxpayers; or

b. no later than 1 (one) year after the issuance of the business permit issued by the Online Single Submission Institution for the Investment and/or spin-off.

(6) The application for Income Tax facilities referred to in paragraph (3) that has been completely received, is submitted by the Online Single Submission System to the Minister as proposal for the granting of Income Tax facilities and the Online Single Submission System notifies the Taxpayer that the application for Income Tax facilities is in process.

Article 412

(1) The decision on the granting of Income Tax facilities is enacted by the Minister.

(2) The enactment on the decision on the granting of Income Tax facilities referred to in paragraph (1) is granted after obtaining the proposal for the granting of Income Tax facilities referred to in Article 411 paragraph (6).

Article 413

(1) The granting of Income Tax facilities referred to in Article 412 is implemented by the minister who administers governmental affairs in the field of investments/investment coordination for and on behalf of the Minister.

(2) The decision on the granting of Income Tax facilities referred to in Article 412 paragraph (2) implemented by the minister who administers governmental affairs in the field of investments/investment coordination is issued no later than 5 (five) business days after the proposal for the granting of Income Tax facilities referred to in Article 411 paragraph (6) is completely and correctly received.

(3) The decision referred to in paragraph (2) at the minimum contains details of the information on the Investment that obtains Income Tax facilities as follows:
   a. the name, Taxpayer Identification Number and address of the Taxpayer;
   b. details of the types of Income Tax facilities;
   c. the business identification number, principle permit, investment permit, Investment registration or business permit and business or project location for which the facilities are applied for;
   d. the time the Income Tax facilities come into force;
   e. obligations for the Taxpayers that obtain Income Tax facilities referred to in Article 420;
   f. prohibitions for the Taxpayers that obtain Income Tax facilities referred to in Article 421; and
   g. the business sector, Indonesian Standard Industrial Classification, product scope and Investment value plan.

(4) The implementation of the granting of Income Tax facilities by the minister who administers governmental affairs in the field of investments/investment coordination referred to in paragraph (1) is reported to the Minister per quarter.

Article 414

(1) Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph a may be utilised from the Tax Year of the Start of Commercial Production.
(2) Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph b and subparagraph c may be utilised from the month the decision on the approval of the granting of Income Tax facilities referred to in Article 412 is enacted.
(3) Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph d:
    a. number 1 and number 2 shall come into force from the month the decision on the approval of the granting of Income Tax facilities referred to in Article 412 is issued and granted for losses in the first Tax Year, the second Tax Year and/or the third Tax Year from the Start of Commercial Production; and
    b. number 3, number 4, number 5, number 6, number 7 and number 8 shall come into force from the time the decision on the additional loss carry-forward period is enacted by the Director General of Taxes based on the findings of the Audit for other purposes and granted for losses until the utilisation period of the facilities referred to in Article 408 paragraph (1) subparagraph a ends.

Article 415

(1) The utilisation of Income Tax facilities referred to in Article 408 paragraph (1) subparagraph a is determined based on the findings of the Audit for other purposes conducted by the Director General of Taxes.
(2) The application for the utilisation of Income Tax facilities referred to in paragraph (1) is submitted by the Taxpayer online through the Online Single Submission System by:
    a. submitting the completeness requirements in the form of the realisation of fixed assets as well as layout drawings;
    b. fulfilling the requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate; and
    c. submitting the completeness requirements in the form of documents related to:
        1. the first sales transaction of products to the market, including in the form of Tax Invoices or invoices; or
        2. the first time the products are for personal use for further production processes, including in the form of the personal use report.
(3) The Audit for other purposes referred to in paragraph (1) is conducted after the Director General of Taxes receives the application for the utilisation of Income Tax facilities through the Online Single Submission System referred to in paragraph (2).
(4) The Audit for other purposes referred to in paragraph (1) is implemented in a maximum period of 45 (forty-five) business days from the time the

notice of Audit is submitted to the Taxpayer, representative, attorney or employee of the Taxpayer.

(5) The Audit for other purposes referred to in paragraph (1) includes the following activities:
   a. the determination of the Start of Commercial Production;
   b. the assessment of the conformity of the criteria and requirements stipulated under Article 2 of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions;
   c. the calculation of the amount of the value of tangible fixed assets referred to in Article 408 paragraph (1) subparagraph a; and
   d. the assessment of the fulfilment of the provisions on the time of the submission of the application for the Corporate Income Tax facility referred to in Article 411 paragraph (4).

(6) In the context of Audits for other purposes referred to in paragraph (5) subparagraph b, the Director General of Taxes may request data, information, details or evidence from the ministry/institutions supervising the sectors.

(7) The amount of the value of tangible fixed assets determined based on Audit for other purposes findings referred to in paragraph (5) constitutes the basis for the calculation of the net income reduction facility referred to in Article 408 paragraph (1) subparagraph a.

(8) Based on the findings of the Audit for other purposes referred to in paragraph (5), the Minister enacts the decision on the utilisation of Income Tax facilities.

(9) The authority on the decision on the utilisation of Income Tax facilities referred to in paragraph (8) and the determination of the value of tangible fixed assets constituting the basis for the calculation of the net income reduction referred to in Article 410 is delegated to the Director General of Taxes for and on behalf of the Minister.

Article 416

(1) The utilisation of Income Tax facilities referred to in Article 408 paragraph (1) subparagraph b, is implemented with the following provisions:
   a. For the tangible fixed asset group referred to in Article 408 paragraph (1) subparagraph b number 1 and the tangible fixed asset group referred to in Article 408 paragraph (1) subparagraph b number 2, conducted pursuant to the provisions on depreciation and amortisation stipulated under statutory provisions in the field of Income Tax;
   b. The basis for accelerated depreciation and amortisation:
      1. For Taxpayers that use the depreciation and amortisation straight-line method is:
         a) the acquisition cost, for tangible fixed assets and/or intangible assets acquired after the decision on the approval of the granting of Income Tax facilities referred to in Article 412 is issued; or

b) the net book value, for tangible fixed assets and/or intangible assets acquired before the decision on the approval of the granting of Income Tax facilities referred to in Article 412 is issued;

2. For Taxpayers that use the decreasing balance depreciation and amortisation method is the net book value of tangible fixed assets.

c. The accelerated depreciation rates for tangible fixed assets are as referred to in Article 408 paragraph (1) subparagraph b number 1 and accelerated amortisation rates are as referred to in Article 408 paragraph (1) subparagraph b number 2;

d. The accelerated useful life of the assets is half of the remaining useful life of the assets as stipulated under statutory provisions in the field of Income Tax provided that a fraction of a month is treated as 1 (one) full month.

(2) The calculation of the depreciation of tangible fixed assets and the amortisation of intangible assets for the month before the entry of force on the decision on the approval of the granting of Income Tax facilities, shall be conducted pursuant to the provisions on depreciation and amortisation stipulated under statutory provisions in the field of Income Tax.

Article 417

(1) Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph c may be utilised from the entry of force of the decision on the approval of the granting of Income Tax facilities and expire at the time the Taxpayer no longer fulfils the provisions on business sectors, Indonesian standard industrial classification (KBLI), product scope, criteria or requirements in the attachment to the decision on the approval of the granting of Income Tax facilities.

(2) In the event that the Taxpayer, in addition to producing products that are granted the facilities, also produces products that are not granted the facilities, the amount of Dividends that obtain Income Tax Facilities referred to in Article 408 paragraph (1) subparagraph c is the percentage of the total sales value of the products that obtain the facilities against the total sales value of all products in the Tax Year before the Dividends are distributed.

(3) For Taxpayers conducting a spin-off, the amount of Dividends that obtain Income Tax facilities referred to in Article 408 paragraph (1) subparagraph c is proportional to the percentage of the tax book value of the assets that obtain Income Tax facilities against the total tax book value of the assets acquired before the spin-off plus the value of the spin-off asset realisation at the time the spin-off is completed.

Article 418

(1) The utilisation of Income Tax facilities referred to in Article 408 paragraph (1) subparagraph d, is granted with the following provisions:

a. the additional 1 (one) year referred to in Article 408 paragraph (1) subparagraph d number 4 applies to losses in the Tax Year the expenses for economic and/or social infrastructure at the business location of a minimum of IDR10,000,000,000.00 (ten billion rupiah) are achieved;
b. the additional 1 (one) year referred to in Article 408 paragraph (1) subparagraph d number 5 may be utilised insofar as the Taxpayer uses raw materials and/or components produced domestically of a minimum of 70% (seventy per cent):
   1. no later than the 2nd (second) Tax Year after the Start of Commercial Production; and
   2. valid for the Tax Year the application for the determination of the extension of the loss carry-forward period is submitted;
c. the additional 1 (one) year referred to in Article 408 paragraph (1) subparagraph d number 6 point a) applies to losses in the Tax Year the Taxpayer reaches additional Indonesian workers of a minimum of 300 (three hundred) people and may be utilised in the event that the Taxpayer maintains the number for 4 (four) consecutive Tax Years;
d. the additional 2 (two) years referred to in Article 408 paragraph (1) subparagraph d number 6 point b) applies to losses in the Tax Year the Taxpayer reaches additional Indonesian workers of a minimum of 600 (six hundred) people and may be utilised in the event that the Taxpayer maintains the number for 4 (four) consecutive Tax Years;
e. the additional 2 (two) years referred to in Article 408 paragraph (1) subparagraph d number 7 applies to losses in the Tax Year the domestic research and development expenses in the context of product development or production efficiency of a minimum 5% (five per cent) of the amount of Investment realisation is achieved, fulfilled no later than within a period of 5 (five) years from the Start of Commercial Production; and/or
f. the additional 2 (two) years referred to in Article 408 paragraph (1) subparagraph d number 8 applies to the Tax Year exports are conducted of a minimum of 30% (thirty per cent) of the total sales value.

(2) For Taxpayers maintaining separate Bookkeeping for Investments that obtain facilities and those that do not obtain facilities, the calculation of the amount of losses that obtain the additional loss carry-forward period facility referred to in Article 408 paragraph (1) subparagraph d shall comply with the calculation based on separate Bookkeeping for Investments that obtain the facilities and those that do not obtain the facilities.

(3) In the event that the Taxpayer does not maintain separate Bookkeeping for Investments that obtain the facilities and do not obtain the facilities, the amount of losses that obtain the additional loss carry-forward period facility referred to in Article 408 paragraph (1) subparagraph d is calculated using a formula.

Article 419

(1) To utilise the Income Tax facilities referred to in Article 408 paragraph (1) subparagraph d number 3, number 4, number 5, number 6, number 7 and number 8, the Taxpayer must apply to the Director General of Taxes online through the Online Single Submission Systems.
(2) Based on the application referred to in paragraph (1), the Director General of Taxes issues the decision on the additional loss carry-forward period facility after conducting an Audit for other purposes.
(3) The Audit period referred to in paragraph (2) is a maximum of 45 (forty-five) business days from the time the notice of tax Audit is submitted to the Taxpayer, representative, attorney or employee of the Taxpayer.

Article 420

(1) Taxpayers that have obtained the decision on the approval of the granting of Income Tax facilities are required to submit reports on the following matters:
    a. the amount of Investment realisation; and
    b. the amount of production realisation.
(2) The reports referred to in paragraph (1) are submitted by the Taxpayer to the Director General of Taxes online through the Online Single Submission System every year no later than 30 (thirty) days after the end of the Tax Year concerned in the period:
    a. from the issuance of the decision on the approval of the granting of Income Tax facilities until the issuance of decision on the Start of Commercial Production for the report referred to in paragraph (1) subparagraph a; and
    b. from the issuance of the decision on the Start of Commercial Production until the end of the tax useful life of the assets for the report referred to in paragraph (1) subparagraph b.
(3) In the event that the Taxpayer does not submit the reports referred to in paragraph (1) or submits the reports but does not fulfil the provisions referred to in paragraph (2), the Taxpayer concerned may be subject to an Audit by the Directorate General of Taxes.

Article 421

(1) Tangible fixed assets that obtain the Income Tax facilities referred to in Article 408 paragraph (1) subparagraph a are prohibited from being used other than for the granting of the facilities or transferred, unless replaced with new tangible fixed assets, before the end of the longer period between:
    a. a period of 6 (six) years from the Start of Commercial Production; or
    b. the useful life of tangible fixed assets pursuant to the provisions referred to in Article 408 paragraph (1) subparagraph b number 1.
(2) Intangible assets that obtain the Income Tax facilities referred to in Article 408 paragraph (1) subparagraph b number 2 are prohibited from being used other than for the granting of the facilities or transferred, unless replaced with new tangible fixed assets, before the end of the useful life of

the said intangible assets pursuant to the provisions referred to in Article 408 paragraph (1) subparagraph b number 2.

(3) In the event that the replacement of tangible fixed assets referred to in paragraph (1):
   a. occurs before the Start of Commercial Production, the following provisions shall apply:
      1. the value of tangible fixed assets used as the basis for depreciation is the acquisition value of the new tangible fixed assets; and
      2. the depreciation method used shall comply with the provisions on depreciation stipulated under statutory provisions in the field of Income Tax.
   b. occurs after the Start of Commercial Production, the following provisions shall apply:
      1. the value of tangible fixed assets constituting the basis for Income Tax facilities referred to in Article 408 paragraph (1) subparagraph a is the lower value between the value of the replaced tangible fixed assets and the replacement tangible fixed assets;
      2. in the event that the value of the replacement tangible fixed assets:
         a) is lower than the value of the replaced tangible fixed assets, the facility referred to in Article 408 paragraph (1) subparagraph a may be utilised until the end of the remaining utilisation period with the value of the replacement tangible fixed assets; or
         b) is higher than the value of the replaced tangible fixed assets, the facility referred to in Article 408 paragraph (1) subparagraph a may be utilised until the end of the remaining utilisation period with the value of the replaced tangible fixed assets.
      3. the value of tangible fixed assets used as the basis for depreciation is the acquisition value of the new tangible fixed assets;
      4. the depreciation method used shall comply with the provisions on depreciation stipulated under statutory provisions in the field of Income Tax; and
      5. before the Taxpayer replaces the tangible fixed assets referred to in paragraph (1), the Taxpayer must submit a written notification to the Director General of Taxes.

(4) The replacement tangible fixed assets referred to in paragraph (3) cannot be granted the facility referred to in Article 408 paragraph (1) subparagraph b.

Article 422

(1) In the event that the Taxpayer that has obtained Income Tax facilities but no longer fulfils the provisions referred to in Article 407, Article 411 paragraph (4) and/or Article 421, the Taxpayer is subject to administrative penalties in the form of:

a. the revocation of the decision on the approval of the granting of Income Tax facilities which have been granted pursuant to this Ministerial Regulation; and
b. subject to taxes and penalties pursuant to statutory provisions in the field of taxation.

(2) In addition to being subject to administrative penalties referred to in paragraph (1), the Taxpayer may no longer be granted Income Tax facilities for Investments in certain business sectors and/or certain regions.
(3) The revocation of the decision on the approval of the granting of facilities referred to in paragraph (1) subparagraph a is stipulated by the Minister.
(4) The Minister delegates the authority to revoke the decision on approval referred to in paragraph (3) in the form of mandate to the Director General of Taxes.

Section Three
The Granting of the Net Income Reduction Facility for New Investments or Spin-offs in Certain Business Sectors Constituting Labour-Intensive Industries

Article 423

(1) Taxpayers performing Investments in labour-intensive industries may be granted Income Tax facilities in the form of net income reduction to a certain level for the amount of Investments in a certain period.
(2) The net income reduction referred to in paragraph (1) amounts to 60% (sixty per cent) of the amount of Investments in the form of tangible fixed assets, including land, used for the Main Business Activity, charged for 6 (six) years from the Tax Year of the Start of Commercial Production of 10% (ten per cent) respectively per year.
(3) The labour-intensive industries referred to in paragraph (1) must fulfil the following provisions:
a. constituting resident Corporate Taxpayers;
b. conducting the Main Business Activity according to business sectors with the 2020 Indonesian Standard Industrial Classification, having certain product scope, in certain regions, with certain requirements; and
c. employing Indonesian workers for Investments that obtain Income Tax facilities of a minimum of 300 (three hundred) people.
(4) The number of Indonesian workers referred to in paragraph (3) subparagraph c is the average number of Indonesian workers in a Tax Year.

Article 424

(1) Income Tax Facilities referred to in Article 423 paragraph (1) are granted to tangible fixed assets, including land, with the following provisions:
a. acquired by Taxpayers in a new condition, unless it is a relocation as a whole as one package of Investments from another country;

b. listed in the principle permit, investment permit, Investment registration, issued by the Indonesian Investment Coordinating Board/Provincial One-Stop Integrated Service and Investment Services/Regency/Municipal One-Stop Integrated Service and Investment Services or Business Licensing issued by the Online Single Submission Institution which constitutes the basis for the granting of Income Tax facilities; and
c. owned and used for the Main Business Activity.

(2) Tangible fixed assets other than land must fulfil the provisions referred to in paragraph (1) and be acquired after:
a. the principle permit;
b. investment permit;
c. investment registration; and/or
d. Business Licensing issued by the Online Single Submission Institution,
are issued.

Article 425

(1) The conformity of the fulfilment of:
a. business sectors pursuant to the Appendix of this Ministerial Regulation; and
b. requirements for the plan to employ Indonesian workers referred to in Article 423 paragraph (3) subparagraph c,
is determined online through the Online Single Submission System.

(2) In the event that the Investment of the Taxpayer:
a. fulfils the provisions referred to in paragraph (1), the Online Single Submission System notifies the Taxpayer that the Investment fulfils the provisions to obtain Income Tax facilities; or
b. does not fulfil the provisions referred to in paragraph (1), the Online Single Submission System notifies the Taxpayer that the Investment does not fulfil the provision to obtain Income Tax facilities.

(3) Taxpayers that have received the notification referred to in paragraph (2) subparagraph a are deemed to have applied for Income Tax facilities online through the Online Single Submission System if:
a. they have submitted the completeness requirements in the form of a softcopy of details of fixed assets in the Investment value plan; and
b. the shareholders fulfil the requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate.

(4) The application for Income Tax facilities referred to in paragraph (3) must be submitted before the Start of Commercial Production.

(5) The application for the Income Tax facilities referred to in paragraph (3) is submitted:
a. simultaneously with the registration to obtain a business identification number for new Taxpayers; or
b. no later than 1 (one) year after the issuance of Business Licensing issued by the Online Single Submission Institution for Investments.

(6) The application for Income Tax facilities referred to in paragraph (3) that has been completely received, is submitted by the Online Single Submission System to the Minister as the proposal for the granting of Income Tax facilities and the Online Single Submission System notifies the Taxpayer that the application for Income Tax facilities is in process.

Article 426

(1) The granting of Income Tax facilities referred to in Article 423 paragraph (1) is conducted by the minister who administers governmental affairs in the field of investments/investment coordination for and on behalf of the Minister after receiving the proposal for the granting of Income Tax facilities referred to in Article 425 paragraph (6).
(2) The notification of the granting of Income Tax facilities referred to in paragraph (1) is submitted no later than 5 (five) business days after the proposal for the granting of Income Tax facilities referred to in Article 425 paragraph (6) is completely and correctly received.

Article 427

(1) The utilisation of Income Tax facilities referred to in Article 423 paragraph (1) starts from the Tax Year of the Start of Commercial Production until the sixth year from the Tax Year of the Start of Commercial Production determined by the Director General of Taxes for and on behalf of the Minister through an Audit for other purposes.
(2) The application for the utilisation of Income Tax facilities referred to in paragraph (1) is submitted by the Taxpayer online through the Online Single Submission System by:
    a. submitting the completeness requirements in the form of the realisation of fixed assets as well as layout drawings;
    b. fulfilling requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate; and
    c. submitting the completeness requirements in the form of the documents related to:
        1. the first sales transaction of products to the market, including in the form of Tax Invoices or invoices; or
        2. the first time the products are for personal use for further production processes, including in the form of the personal use report.
(3) The Audit for other purposes referred to in paragraph (1) is conducted after the Director General of Taxes receives the application for the utilisation of Income Tax facilities referred to in paragraph (2).
(4) The Audit for other purposes referred to in paragraph (1) is implemented within a maximum period of 45 (forty-five) business days from the time the notice of Audit is submitted to the Taxpayer, representative, attorney or employee of the Taxpayer.
(5) The Audit for other purposes referred to in paragraph (1) includes the following activities:

a. the determination of the Start of Commercial Production referred to in Article 425 paragraph (4);
b. the calculation of the amount of the realisation value of the new Investments until the Start of Commercial Production;
c. the assessment of the conformity of products with the business sector, the Indonesian Standard Industrial Classification of the Main Business Activity; and
d. the assessment of the number of the employed Indonesian workers.

Article 428

(1) Taxpayers that have obtained Income Tax facilities referred to in Article 426 paragraph (1) are required to submit reports on:
   a. the amount of Investment realisation; and
   b. the amount of the employment realisation of Indonesian workers.
(2) The reports referred to in paragraph (1) are submitted to the Director General of Taxes online through the Online Single Submission System every year no later than 30 (thirty) days after the end of the Tax Year concerned in the period:
   a. from the notification of the granting of Income Tax facilities until the determination of the utilisation referred to in Article 427 paragraph (1) for the report referred to in paragraph (1) subparagraph a; and
   b. the utilisation referred to in Article 427 paragraph (1) for the report referred to in paragraph (1) subparagraph b.
(3) In the event that the Taxpayer does not submit the reports referred to in paragraph (1) or submit the reports but does not fulfil the provisions referred to in paragraph (2), the Taxpayer concerned may be subject to an Audit by the Directorate General of Taxes.

Article 429

(1) Tangible fixed assets that obtain the Income Tax facilities referred to in Article 423 paragraph (1) are prohibited from being used other than for the granting of the facilities or transferred before the end of a period of 6 (six) years from the start of the utilisation of Income Tax facilities referred to in Article 427 paragraph (1).
(2) Excluded from the provisions referred to in paragraph (1) in the event that the tangible fixed assets that obtain Income Tax facilities referred to in Article 423 paragraph (1) are replaced with new tangible fixed assets.
(3) In the event that the Taxpayer replaces the tangible fixed assets referred to in paragraph (2), the following provisions shall apply:
   a. the value of tangible fixed assets constituting the basis for Income Tax facilities referred to in Article 423 paragraph (1) is the lower value between the value of the replaced tangible fixed assets and the value of the replacement tangible fixed assets;
   b. in the event that the acquisition value of the replacement tangible fixed assets:
      1. is lower than the acquisition value of tangible fixed assets being replaced, the facility referred to in Article 423 paragraph (1) may

be utilised until the end of the remaining utilisation period with the acquisition value of the replacement tangible fixed assets; or

2. is higher than the acquisition value of the replaced tangible fixed assets, the facility referred to in Article 423 paragraph (1) may be utilised until the end of the remaining utilisation period with the acquisition value of the replaced tangible fixed assets.

c. the Taxpayer must submit written notification to the Director General of Taxes before replacing the tangible fixed assets referred to in paragraph (2).

Article 430

(1) The charging of net income reduction referred to in Article 423 paragraph (1) cannot be conducted, in the event that:
   a. the Main Business Activity of the Taxpayer no longer fulfils the provisions on business sectors referred to in Article 423 paragraph (3) subparagraph b;
   b. the Taxpayer, during the utilisation period of Income Tax facilities, does not fulfil the requirements for the number of workers referred to in Article 423 paragraph (3) subparagraph c; or
   c. the Taxpayer does not fulfil the provisions referred to in Article 429.

(2) The Taxpayers referred to in paragraph (1) subparagraph a and subparagraph c:
   a. are subject to penalties pursuant to statutory provisions in the field of taxation;
   b. cannot utilise the Investment facility referred to in Article 423 paragraph (1) for the following Tax Year; and
   c. may no longer be granted Income Tax facilities pursuant to this Ministerial Regulation.

(3) The Taxpayers referred to in paragraph (1) subparagraph b:
   a. Income Tax that should be payable must be re-paid;
   b. are subject to penalties pursuant to statutory provisions in the field of taxation;
   c. may utilise the Investment facility referred to in Article 423 paragraph (1) for the following Tax Year in the event that the minimum number of workers has been re-fulfilled; and
   d. are not granted the additional utilisation period of the Investment facility.

Article 431

Investments that have obtained:

a. Income Tax Facilities for Investments in certain business sectors and/or in certain regions pursuant to statutory provisions stipulating Income Tax facilities for Investments in certain business sectors and/or certain regions;
b. the Corporate Income Tax reduction facility pursuant to statutory provisions stipulating the granting of the corporate Income Tax reduction facility; or

c. Income Tax Facilities in Special Economic Zones pursuant to statutory provisions stipulating the administration of Special Economic Zones,

cannot be granted Income Tax facilities pursuant to this Ministerial Regulation.

Section Four
The Granting of Gross Income Reduction for Certain Research and Development Activities in Indonesia

Article 432

(1) Taxpayers conducting certain research and development activities in Indonesia may be granted a Gross Income reduction of a maximum of 300% (three hundred per cent) of the amount of expenses incurred for certain Research and Development activities in Indonesia charged within a certain period.

(2) The maximum Gross Income reduction of 300% (three hundred per cent) referred to in paragraph (1) includes:
   a. the Gross Income reduction of 100% (one hundred per cent) of the amount of expenses incurred for Research and Development activities; and
   b. the additional Gross Income reduction of a maximum of 200% (two hundred per cent) of accumulated expenses incurred for Research and Development activities in a certain period.

(3) The amount of the additional Gross Income reduction of a maximum of 200% (two hundred per cent) referred to in paragraph (2) subparagraph b includes:
   a. 50% (fifty per cent) if the Research and Development produce Intellectual Property rights in the form of Patents or Plant Variety Protection Rights registered with the ministry that administers governmental affairs in the field of law and human rights;
   b. 25% (twenty-five per cent) if Research and Development produce Intellectual Property rights in the form of Patents or Plant Variety Protection Rights other than those registered with the ministry that administers governmental affairs in the field of law and human rights referred to in subparagraph a, are also registered at the foreign Patent Office or Plant Variety Protection Office;
   c. 100% (one hundred per cent) if Research and Development reach the Commercialisation stage; and/or
   d. 25% (twenty-five per cent) if Research and Development that produce Intellectual Property Rights in the form of Patents or Plant Variety Protection Rights referred to in subparagraph a, subparagraph b and/or reach the Commercialisation stage referred to in subparagraph c, are conducted through cooperation with government Research and Development institutions and/or higher education institutions in Indonesia.

Article 433

(1) The commercialisation referred to in Article 432 paragraph (3) subparagraph c and subparagraph d may be conducted by:
   a. Taxpayers conducting Research and Development activities; or
   b. other Taxpayers.

(2) In the event that the Commercialisation is conducted by other Taxpayers referred to in paragraph (1) subparagraph b, the additional Gross Income reduction referred to in Article 432 paragraph (3) subparagraph c and/or subparagraph d is granted to the Taxpayers conducting Research and Development activities.

(3) The commercialisation by other Taxpayers referred to in paragraph (1) subparagraph b may be conducted if the Taxpayers conducting Research and Development activities referred to in Article 432 paragraph (1):
   a. have obtained Intellectual Property rights in the form of Patents or Plant Variety Protection Rights; and
   b. must derive income at the actual value or that which should be received for the utilisation of Intellectual Property rights in the form of Patents or Plant Variety Protection Rights, from other Taxpayers conducting Commercialisation.

Article 434

(1) Certain Research and Development referred to in Article 432 paragraph (1) which may be granted the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b include Research and Development which:
   a. are conducted by Taxpayers, other than Taxpayers conducting business based on production sharing contracts, contracts of work or mining concession cooperation contracts whose taxable income is calculated pursuant to separate provisions in contracts that are different from the general provisions in the field of Income Tax;
   b. are implemented no later than from the entry of force of Government Regulation Number 45 of 2019 concerning the Amendment to Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year;
   c. fulfil the following criteria:
      1. aiming to obtain new inventions;
      2. based on original concepts or hypotheses;
      3. having uncertainty about the final outcome;
      4. planned and with a budget; and
      5. aiming to create items that may be freely transferred or traded on the market; and
   d. constituting Research and Development with priority focus and themes.

(2) Activities that are not granted the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b include the following activities:

a. the full implementation of engineering in production activities at the initial stage of the commercial operation;
b. quality control during commercial operation, including routine testing of the products;
c. repair of damage that occurs during commercial operation;
d. repair, addition, enrichment or other routine quality developments of existing products;
e. the adjustment to existing capabilities to specific requests or customer needs as part of ongoing commercial activities;
f. seasonal or periodic design changes to existing products;
g. routine design of equipment and moulds;
h. construction engineering and design in connection with the construction, relocation, rearrangement or start-up of facilities and equipment; and/or
i. marketing research.

(3) Research and Development expenses that may be granted the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b include expenses that are related to:
a. assets other than land and buildings, in the form of:
1. depreciation expenses for tangible fixed assets and/or amortisation expenses for non-tangible assets; and
2. supporting expenses for tangible fixed assets which include electricity, water, fuel and maintenance expenses;
b. goods and/or materials;
c. salaries, honoraria or similar payments paid to employed employees, researchers and/or engineers;
d. the processing to obtain Intellectual Property rights in the form of Patents or Plant Variety Protection Rights; and/or
e. remunerations paid to Research and Development institutions and/or higher education institutions, in Indonesia, contracted by the Taxpayer to conduct Research and Development activities without having rights to the results of the Research and Development.

(4) The expenses referred to in paragraph (3) are charged based on each proposal for Research and Development activities.

(5) In the event that the expenses referred to in paragraph (3) are indistinguishable for each Research and Development proposal, the charging based on each proposal is conducted proportionally based on the time of the utilisation of or assignment.

(6) The additional Gross Income reduction for the expenses referred to in paragraph (3) subparagraph a cannot be granted in the event that the assets used are part of the Investment that has obtained an Income Tax facility stipulated under:
a. Article 31A of the Income Tax Law; or
b. Article 29A of Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year as amended by Government Regulation Number 45 of 2019 concerning the Amendment to

Government Regulation Number 94 of 2010 concerning the Calculation of Taxable Income and Settlement of Income Tax in the Current Year.

Article 435

(1) The amount of the additional Gross Income reduction that may be utilised is the percentage of the additional Gross Income reduction referred to in Article 432 paragraph (3) multiplied by the accumulation of related Research and Development expenses for the last 5 (five) Tax Years from the earlier occurrence between the time:
   a. of the registration of Intellectual Property rights in the form of Patents or Plant Variety Protection Rights; or
   b. the Commercialisation stage is reached.

(2) The additional Gross Income reduction referred to in paragraph (1) is charged starting the time the Taxpayer obtains Intellectual Property rights in the form of Patents or Plant Variety Protection Rights and/or reaches the Commercialisation stage.

(3) The amount of the additional Gross Income reduction referred to in paragraph (1) which may be charged in each Tax Year is a maximum of 40% (forty per cent) of taxable income before being deducted by the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b.

(4) In the event that the additional Gross Income reduction referred to in paragraph (1) is higher than 40% (forty per cent) of taxable income before being deducted by the additional Gross Income reduction referred to in paragraph (3), the excess difference of the additional Gross Income reduction that has not been utilised may be set off in the following Tax Years.

Article 436

(1) The Taxpayer conducting certain Research and Development to obtain the additional Gross Income reduction referred to in Article 432 paragraph (4) subparagraph a, subparagraph b and/or subparagraph d is required to register the Intellectual Property rights in the form of Patents or Plant Variety Protection Rights:
   a. on behalf of Taxpayer receiving the additional Gross Income reduction; or
   b. jointly on behalf of the Taxpayers collaborating on Research and Development activities in Indonesia.

(2) The Intellectual Property rights in the form of Patents and/or Plant Variety Protection Rights resulting from Research and Development activities that obtain the additional Gross Income reduction referred to in paragraph (1) cannot be transferred to another party.

(3) Excluded from the provisions referred to in paragraph (2), in the event that the transfer is conducted after the protection period for Intellectual Property rights in the form of Patents and or Plant Variety Protection

Rights is no longer held by the Taxpayer pursuant to statutory laws and regulations.

(4) In the event that the Taxpayer transferring Intellectual Property rights in the form of Patents and/or Plant Variety Protection Rights resulting from Research and Development activities that obtain the additional Gross Income reduction referred to in paragraph (2), the additional Gross Income reduction that has been utilised is deemed the Taxpayer's income and subject to Income Tax payable at the time the Intellectual Property transfer is conducted.

Article 437

(1) To obtain the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b, the Taxpayer must apply through the Online Single Submission System by:
   a. uploading the Research and Development activity proposal; and
   b. fulfilling the requirements to be granted a Tax Clearance Certificate pursuant to the provisions stipulating procedures for the granting of the Tax Clearance Certificate.

(2) The Research and Development activity proposal referred to in paragraph (1) subparagraph a at the minimum contains:
   a. the number and date of the Research and Development activity proposal;
   b. the name and Taxpayer Identification Number;
   c. the focus, theme and topic of the Research and Development;
   d. the target achievements of the Research and Development activities;
   e. the name and Taxpayer Identification Number of the partner if Research and Development are conducted through collaboration;
   f. the estimated required time to achieve the expected final outcome of the Research and Development activities;
   g. the estimated number of employees and/or other parties involved in the Research and Development activities; and
   h. the estimated expenses and the year the expenses are incurred.

(3) For the application referred to in paragraph (1), the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space examines the conformity of the submitted Research and Development activity proposal with the provisions on the proposal referred to in paragraph (2) and the Research and Development criteria referred to in Article 434.

(4) For the examination of the conformity referred to in paragraph (3), coordination is conducted among the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space integrated with the ministries and/or the government institutions that

handle the fields related to the theme of the Research and Development being applied for.

(5) In the event that the Research and Development activity proposal is declared conforming or non-conforming with the provisions referred to in paragraph (2) and declared conforming or non-conforming with the Research and Development criteria referred to in Article 434, the notification of the results of the examination referred to in paragraph (3) is submitted to the Taxpayer through the Online Single Submission System for the application referred to in paragraph (1).

(6) The notification of the results of the examination referred to in paragraph (5) is carbon copied to the Director General of Taxes as well as the ministries and/or the government institutions that handle the fields related to the theme of the Research and Development referred to in paragraph (4) through the Online Single Submission System.

Article 438

(1) In the event that Research and Development activities are conducted through collaboration between one or more Taxpayers and each Taxpayer bears some or all of the Research and Development expenses, the collaborating Taxpayers must prepare 1 (one) joint Research and Development activity proposal.

(2) The joint Research and Development activity proposal referred to in paragraph (1) in addition to containing the matters referred to in Article 437 paragraph (2) must also include the activity plan and expenses borne by each collaborating Taxpayer.

(3) Each Taxpayer submits the application referred to in Article 437 paragraph (1).

(4) The amount of the additional Gross Income reduction referred to in Article 435 paragraph (1) for each Taxpayer is determined based on:
   a. the accumulated Research and Development expenses borne by each Taxpayer; and
   b. the percentage of the additional Gross Income reduction referred to in Article 432 paragraph (3), according to the ownership of Intellectual Property rights in the form of Patents or Plant Variety Protection Rights and/or the condition of reaching the Commercialisation stage of each Taxpayer.

Article 439

(1) The Taxpayer that has received the notification referred to in Article 437 paragraph (5) is required to submit the report on Research and Development expenses each Tax Year to the Director General of Taxes and the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space, through the Online Single Submission System.

(2) The report referred to in paragraph (1) must be submitted no later than simultaneously with the filing of the Annual Corporate Income Tax Return for the Tax Year concerned.
(3) In the event that the Taxpayer does not submit the report referred to in paragraph (2) or submits the report but does not fulfil the provisions on the sample format listed in the Appendix of this Ministerial Regulation, the Head of the Tax Office where the Taxpayer is registered issues a reprimand letter to the Taxpayer to submit the report within a maximum period of 14 (fourteen) days from the time the reprimand letter is submitted.

Article 440

(1) To utilise the charging of the additional Gross Income reduction referred to in Article 435, the Taxpayer submits the notification as well as supporting evidence that the Research and Development have obtained Intellectual Property rights in the form of Patents or Plant Variety Protection Rights and/or reached the Commercialisation stage to the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space through the Online Single Submission System.
(2) The examination of the conformity of the proposal with the realisation of Research and Development activities is conducted by the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space.
(3) For the examination of the conformity referred to in paragraph (3), coordination is conducted among the heads of the institutions that administer governmental affairs in the fields of research, development, review and application as well as invention and innovation, administration of nuclear energy and integrated administration of space integrated with the ministries and/or the government institutions that handle the fields related to the theme of the Research and Development being applied for.
(4) The results of the examination referred to in paragraph (2) state that:
    a. the Taxpayer may utilise the additional Gross Income reduction, the amount of the percentage of the additional Gross Income reduction that the Taxpayer may utilise and the Tax Year the Taxpayer may start to utilise the additional Gross Income reduction; or
    b. the Taxpayer cannot utilise the additional Gross Income reduction.
(5) The results of the examination referred to in paragraph (2) are submitted to the Taxpayer and carbon copied to the Director General of Taxes through the Online Single Submission System.
(6) Taxpayers that may utilise the additional Gross Income reduction, are required to file the report on the calculation of the utilisation of the Gross Income reduction every year to the Director General of Taxes through the Online Single Submission System no later than simultaneously with the

filing of the Annual Corporate Income Tax Return for the Tax Year of the utilisation of the additional Gross Income reduction.

(7) In the event that the Taxpayer does not file the report referred to in paragraph (6) or submits the report but does not fulfil the provisions on the sample format listed in the Appendix of this Ministerial Regulation, the Head of the Tax Office where the Taxpayer is registered issues a reprimand letter to the Taxpayer to submit the report within a maximum period of 14 (fourteen) days from the time the reprimand letter is submitted.

Article 441

(1) In the event that the Taxpayer does not obtain the notification of the conformity of the fulfilment of provisions to obtain the additional Gross Income reduction referred to in Article 437 paragraph (5) and/or does not obtain the notification of being able to utilise the additional Gross Income reduction referred to in Article 440 paragraph (4), the Directorate General of Taxes may correct the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b charged by the Taxpayer.

(2) In the event that the Taxpayer does not submit the report on activities and Research and Development expenses referred to in Article 439 paragraph (1) and/or does not submit the report on the calculation of the utilisation of the Gross Income reduction referred to in Article 440 paragraph (6), the Directorate General of Taxes may correct the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b charged by the Taxpayer.

(3) In the event that the Taxpayer does not report the amount and types of Research and Development expenses correctly, the Directorate General of Taxes may correct the additional Gross Income reduction referred to in Article 432 paragraph (2) subparagraph b charged by the Taxpayer.

Section Five
The Criteria of Certain Skills as Well as Procedures for the Imposition of Income Tax on Foreign Nationals

Article 442

(1) Income stipulated under Article 4 paragraph (1) of the Income Tax Law, either that sourced from Indonesia or overseas, is subject to Income Tax pursuant to statutory provisions in the field of Income Tax.

(2) Excluded from the provisions referred to in paragraph (1), a Foreign National that has constituted a tax resident as stipulated under Article 2 paragraph (3) of the Income Tax Law is subject to Income Tax only on income received or accrued from Indonesia with the following provisions:
   a. having certain skills; and
   b. valid for 4 (four) Tax Years from the time he/she becomes a tax resident.

(3) Included in the definition of income received or accrued from Indonesia referred to in paragraph (2) is in the form of income received or accrued

by a Foreign National in connection with employment, services or activities in Indonesia in whatever name and form paid overseas.

(4) The provisions referred to in paragraph (2) shall not apply to a Foreign National who utilises the Tax Treaty between the government of Indonesia and the government of the Tax Treaty partner where the Foreign National derives income from overseas.

Article 443

(1) Foreign Nationals having certain skills referred to in Article 442 paragraph (2) subparagraph a include foreign workers occupying certain positions and foreign researchers.

(2) Foreign Nationals having certain skills referred to in paragraph (1) employed by an Employer, are required to fulfil the following requirements:
   a. the employment of foreign workers who may occupy certain positions as stipulated by the minister who administers governmental affairs in the field of manpower; or
   b. foreign researchers as stipulated by the minister in charge of governmental affairs in the field of research.

(3) The criteria of certain skills referred to in paragraph (1) include:
   a. having expertise in the fields of science, technology and/or mathematics, as evidenced by:
      1. certificate of expertise issued by an institution that has been appointed by the government of Indonesia or the government of the foreign worker's country of origin;
      2. education diploma; and/or
      3. 5 (five) years of work experience at the minimum,

      in the field of science or field of work as per the field of expertise; and
   b. having the obligation to transfer knowledge.

Article 444

(1) The period of 4 (four) Tax Years referred to in Article 442 paragraph (2) subparagraph b is calculated from the time the Foreign National first becomes a tax resident.

(2) In the event that within the period of 4 (four) Tax Years referred to in paragraph (1), the Foreign National leaves Indonesia, the time limit of the period remains calculated from the time the Foreign National first becomes a tax resident.

Article 445

A Foreign National may choose to be subject to Income Tax only on income received or accrued in Indonesia or utilise the Tax Treaty between the government of Indonesia and the government of the tax treaty partner where the Foreign National derives income from overseas.

Article 446

(1) A Foreign National who chooses to be subject to Income Tax only on income received or accrued from Indonesia referred to in Article 442 paragraph (2) must apply to the Director General of Taxes.
(2) The Foreign National who has applied referred to in paragraph (1) must fulfil the provision of having filed the Annual Income Tax Returns for the last 2 (two) Tax Years, as his/her obligation pursuant to statutory laws and regulations in the field of taxation.
(3) The application referred to in paragraph (1) is submitted pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.
(4) The Director General of Taxes based on the results of the examination issues:
    a. the approval letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia, if the requirements referred to in Article 443 are fulfilled; or
    b. the rejection letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia, if the requirements referred to in Article 443 are not fulfilled,

    within a maximum period of 10 (ten) business days after the proof of receipt is issued.

Article 447

(1) Foreign Nationals file income through the Annual Tax Return for:
    a. income received or accrued from Indonesia, if an approval letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia referred to in Article 446 paragraph (4) subparagraph a is issued; or
    b. income they receive or accrue from Indonesia and overseas, if a rejection letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia referred to in Article 446 paragraph (4) subparagraph b is issued.
(2) Before filing the income referred to in paragraph (1), Foreign Nationals calculate income pursuant to statutory provisions.

Section Six
Procedures for Maintaining Recording and Certain Criteria as Well as Procedures for Maintaining Bookkeeping for Tax Purposes

Article 448

(1) Individual Taxpayers conducting business activities or independent personal services and Corporate Taxpayers in Indonesia are required to maintain Bookkeeping.
(2) Excluded from the obligation to maintain Bookkeeping referred to in paragraph (1), but are required to maintain recording, include:

a. individual Taxpayers conducting business activities or independent personal services who pursuant to statutory provisions in the field of taxation are allowed to calculate net income using Deemed Profit;
b. individual Taxpayers not conducting business activities or independent personal services; and
c. individual Taxpayers who fulfil certain criteria.

Article 449

(1) The recording referred to in Article 448 paragraph (2) consists of data collected regularly as the basis to calculate the amount of tax payable.
(2) The recording referred to in paragraph (1) must be maintained:
a. by taking into account good faith and reflecting the actual circumstances or business activities as well as supported by documents constituting the basis for recording;
b. in Indonesia using the Latin alphabet, Arabic numerals, rupiah currency at the actual value and/or the value that should otherwise occur and compiled in the Indonesian language or a foreign language permitted by the Minister pursuant to statutory provisions in the field of taxation;
c. in a Tax Year, in the form of a period of 1 (one) calendar year from 1 January until 31 December; and
d. chronologically and systematically based on the date of receipt of gross turnover and/or Gross Income.

Article 450

(1) The individual Taxpayers referred to in Article 448 paragraph (2) subparagraph a are individual Taxpayers who:
a. conduct business and/or independent personal services; and
b. the gross turnover from the activities referred to in subparagraph a is less than IDR4,800,000,000.00 (four billion and eight hundred million rupiah) in 1 (one) Tax Year.
(2) The Taxpayers referred to in paragraph (1) may calculate net income using Deemed Profit and maintain recording, provided that they notify the Director General of Taxes within the first 3 (three) months in the Tax Year concerned.
(3) In the event that the Taxpayers referred to in paragraph (1) are newly registered in the Tax Year concerned, the use of Deemed Profit referred to in paragraph (2) shall be notified no later than:
a. 3 (three) months from the time of registration; or
b. at the end of the Tax Year,
depending on whichever event occurs first.
(4) In the event that the Taxpayers referred to in paragraph (1) do not notify the Director General of Taxes within the period referred to in paragraph (2) or paragraph (3), the Taxpayers are deemed to have chosen to maintain Bookkeeping.

Article 451

(1) Individual Taxpayers who fulfil certain criteria referred to in Article 448 paragraph (2) subparagraph c are individual Taxpayers who:
   a. conduct business activities and/or independent personal services; and
   b. the overall gross turnover from the activities referred to in subparagraph a:
      1. is subject to final Income Tax and/or is not a taxable object; and
      2. does not exceed IDR4,800,000,000.00 (four billion and eight hundred million rupiah) in 1 (one) Tax Year.

(2) The Taxpayers referred to in paragraph (1) may maintain recording without notifying the use of Deemed Profit.

Article 452

(1) The gross turnover referred to in 450 paragraph (1) subparagraph b and Article 451 paragraph (1) subparagraph b number 2 is based on the total gross turnover of each type and/or place of business and/or independent personal services in the previous Tax Year.

(2) In the event that the individual Taxpayers are husband and wife who:
   a. desire a written income and asset separation agreement; or
   b. the wife chooses to exercise tax rights and obligations on her own,

referred to in Article 8 paragraph (2) subparagraph b and subparagraph c of the Income Tax Law, the amount of the gross turnover referred to in paragraph (1) is determined based on the combined gross business turnover and/or independent personal services of the husband and wife.

Article 453

(1) The recording referred to in Article 449 paragraph (1) that must be maintained by:
   a. the Taxpayers referred to in Article 448 paragraph (2) subparagraph a includes:
      1. gross turnover sourced from business activities and/or independent personal services subject to non-final Income Tax;
      2. Gross Income sourced from other than business activities and/or independent personal services subject to non-final Income Tax as well as expenses incurred to derive, collect and maintain the income; and/or
      3. gross turnover and/or Gross Income not constituting a taxable object and/or subject to final Income Tax, either sourced from business activities and/or independent personal services or from other than business activities and/or independent personal services;
   b. the Taxpayers referred to in Article 448 paragraph (2) subparagraph b includes:
      1. Gross Income subject to non-final Income Tax as well as expenses incurred to derive, collect and maintain the income; and/or

2. Gross Income not constituting a taxable object and/or subject to final Income Tax;

c. the Taxpayers referred to in Article 448 paragraph (2) subparagraph c includes:
   1. Gross Income sourced from other than business activities and/or independent personal services subject to non-final Income Tax as well as expenses incurred to derive, collect and maintain the income; and/or
   2. gross turnover and/or Gross Income not constituting a taxable object and/or subject to final Income Tax, either sourced from business activities and/or independent personal services or from other than business activities and/or independent personal services.

(2) The Taxpayers referred to in paragraph (1) subparagraph a and subparagraph c that have more than 1 (one) type of business, place of business and/or independent personal services, recording referred to in paragraph (1) must clearly describe each:
   a. type and/or place of business; and/or
   b. independent personal services concerned.

(3) In addition to having to maintain recording as referred to in paragraph (1), the Taxpayers referred to in Article 448 paragraph (2) must maintain recording of assets and liabilities pursuant to statutory provisions in the field of taxation.

Article 454

(1) The recording referred to in Article 449 paragraph (1) may be maintained by individual Taxpayers electronically or non-electronically.

(2) Books of accounts, records and documents constituting the basis for recording referred to in paragraph (1) and other documents, including the results of data processing, must be retained for 10 (ten) years in Indonesia, at the residence and/or place of business and/or independent personal services for individual Taxpayers.

Article 455

(1) Bookkeeping referred to in Article 448 paragraph (1) must be maintained based on the applicable financial accounting standards in Indonesia, unless statutory tax laws and regulations stipulate otherwise.

(2) Bookkeeping referred to in paragraph (1) must be maintained:
   a. by taking into account good faith and reflecting the actual circumstances or business activities;
   b. in Indonesia using the Latin alphabet, Arabic numerals, rupiah and compiled in the Indonesian language; and
   c. consistently using the consistency principle and on the accrual basis or cash basis.

(3) Excluded from the provisions referred to in paragraph (2) subparagraph b, Bookkeeping may be maintained using:
   a. a foreign language; or

b. a foreign language and currency other than rupiah,

after obtaining a permit from the Minister, pursuant to statutory provisions in the field of taxation.

(4) The consistency principle referred to in paragraph (2) subparagraph c is the same principle used in the Bookkeeping method in the previous Tax Years to prevent profit or loss shifting.

(5) The consistency principle in the Bookkeeping method referred to in paragraph (4), may be in the form of:
   a. the revenue recognition basis;
   b. accounting year;
   c. the inventory valuation method; or
   d. the depreciation and amortisation methods.

(6) Changes in the Bookkeeping method referred to in paragraph (5) must be approved by the Director General of Taxes.

(7) The Bookkeeping referred to in paragraph (2) at the minimum consists of records of:
   a. assets;
   b. liabilities;
   c. capital;
   d. income and expenses; and
   e. the acquisition cost and supplies of goods or services, including sales and purchases,

thereby, the amount of tax payable may be calculated.

(8) The Bookkeeping referred to in paragraph (3) is used as the basis for preparing financial statements in the form of balance sheets and income statements for the Tax Year period.

Article 456

(1) For tax purposes, the Bookkeeping on the cash basis referred to in Article 455 paragraph (2) subparagraph c which constitutes part of the revenue recognition basis referred to in Article 9 paragraph (5) subparagraph a, may be maintained by certain Taxpayers.

(2) The certain Taxpayers referred to in paragraph (1) must fulfil the following requirements:
   a. commercially entitled to maintain Bookkeeping based on financial accounting standards applicable to micro and small businesses; and
   b. constitute the following Taxpayers:
      1. individuals who fulfil the provisions referred to in Article 448 paragraph (2) subparagraph a and subparagraph c, but choose or are required to maintain Bookkeeping; or
      2. Entities that have a business gross turnover not exceeding IDR4,800,000,000.00 (four billion and eight hundred million rupiah) in 1 (one) Tax Year.

(3) The gross turnover referred to in paragraph (2) subparagraph b number 2 is based on the total gross turnover of each type and/or place of business in the previous Tax Year.

(4) The cash basis referred to in paragraph (1) is a calculation method based on cash transactions, with the following provisions:
   a. income is recognised if it has been received in cash in a Tax Year; and
   b. expenses are recognised if they have actually been paid in cash in a Tax Year.

(5) The Bookkeeping on the cash basis referred to in paragraph (4) for tax purposes is a mixed method and must continue to implement the following provisions:
   a. the calculation of the amount of income from business and/or independent personal services, including sales in a Tax Year, must include all transactions, either cash or non-cash;
   b. the calculation of the cost of goods sold must take into account all purchases and inventories, either cash or non-cash transactions; and
   c. the acquisition of depreciable assets and/or amortisable rights because they have a useful life of more than 1 (one) year, may only be deducted from income through depreciation and/or amortisation.

Article 457

(1) Inventories and use of inventories for the calculation of costs of goods referred to in Article 456 paragraph (5) subparagraph b are valued based on the average acquisition cost or by prioritising the inventories acquired first.

(2) The depreciation referred to in Article 456 paragraph (5) subparagraph c is conducted in equal parts over the useful life of:
   a. 4 (four) years for non-building tangible assets; or
   b. 20 (twenty) years for tangible assets in the form of buildings.

(3) The amortisation of intangible assets referred to in Article 456 paragraph (5) subparagraph c is conducted in equal parts over a useful life of 4 (four) years.

(4) The depreciation referred to in paragraph (2) and amortisation referred to in paragraph (3) start in the Tax Year the assets are acquired.

(5) Expenses constituting advance payments of several years which are paid in a lump sum are charged in a lump sum in the Tax Year the expenses are paid in cash.

(6) For certain Taxpayers maintaining Bookkeeping on the cash basis referred to in Article 456 paragraph (1) that cannot distinguish the expenses to derive, collect and maintain income and expenses incurred for personal interests in the context of calculating the amount of Taxable Income, the expenses are charged at 50% (fifty per cent) of the amount of:
   a. the depreciation referred to in paragraph (2) and amortisation referred to in paragraph (3); or
   b. expenses paid in cash in the Tax Year concerned for expenses with a useful life of not more than 1 (one) year, including expenses constituting advance payments referred to in paragraph (5).

Article 458

(1) The certain Taxpayers referred to in Article 456 paragraph (2), must submit notification every Tax Year to be able to maintain Bookkeeping on the cash basis.
(2) The notification referred to in paragraph (1) is submitted by the Taxpayers pursuant to the provisions on the exercise of tax rights and fulfilment of tax obligations referred to in Article 4.
(3) The notification referred to in paragraph (1) must be submitted no later than:
    a. simultaneously with the filing of Annual Income Tax Return for the previous Tax Year; or
    b. the end of the Tax Year in the event that the Taxpayers do not file the Annual Income Tax Return for the previous Tax Year.

    depending on whichever event occurs first.
(4) For newly registered Taxpayers, the notification obligation referred to in paragraph (1) shall be conducted no later than:
    a. 3 (three) months from the time of registration; or
    b. the end of the Tax Year,

    depending on whichever event occurs first.

Article 459

(1) For the notification of Bookkeeping on the cash basis submitted within the period referred to in Article 458 paragraph (3) and paragraph (4), the Director General of Taxes issues the certificate of Bookkeeping on the cash basis, no later than 1 (one) business day after the proof of receipt is issued.
(2) The certificate referred to in paragraph (1) is submitted to the Taxpayers pursuant to the provisions referred to in Article 12.
(3) For the notification of Bookkeeping on the cash basis that does not fulfil the provisions on the period referred to in Article 458 paragraph (3) and paragraph (4), the Director General of Taxes notifies that the Taxpayers' notification cannot be processed.
(4) In the event that certain Taxpayers referred to in Article 456 paragraph (2):
    a. do not submit the notification; or
    b. submit the notification past the period referred to in Article 458 paragraph (3) and paragraph (4),

    the Taxpayers cannot maintain Bookkeeping on the cash basis referred to in Article 456 paragraph (1).
(5) In the event that the Director General of Taxes:
    a. has issued the certificate referred to in paragraph (1); and
    b. discovers data or information that the Taxpayers do not fulfil the provisions referred to in Article 456 paragraph (2),

    the Taxpayers cannot maintain Bookkeeping on the cash basis referred to in Article 456 paragraph (1) starting the following Tax Year.
(6) The Taxpayers that cannot maintain Bookkeeping on the cash basis referred to in paragraph (4) and paragraph (5), are deemed to have obtained approval from the Director General of Taxes to maintain

Bookkeeping based on the applicable financial accounting standards in Indonesia as referred to in Article 455 paragraph (1) on the accrual basis.

Article 460

(1) The Bookkeeping referred to in Article 456 paragraph (1) may be maintained by Taxpayers electronically or non-electronically.
(2) The books of account, records and documents constituting the basis of Bookkeeping referred to in paragraph (1) and other documents, including the results of data processing, must be retained for 10 (ten) years in Indonesia, at:
    a. the residence and/or place of business and/or independent personal services for individual Taxpayers; or
    b. the domicile and/or place of business for Corporate Taxpayers.

Article 461

(1) To the certain Taxpayers referred to in Article 456 paragraph (2) whose Bookkeeping has changed from the accrual basis to the cash basis, the following provisions shall apply:
    a. income and/or expenses that have been recognised when using the accrual basis are no longer recognised when using the cash basis;
    b. income and/or expenses that have not been recognised when using the accrual basis but have fulfilled the requirements for income and/or expense recognition based on the cash basis, the income and/or expenses are recognised immediately in the Tax Year the change into the cash basis occurs; and/or
    c. the net book value of tangible assets and/or intangible assets in the form of:
        1. buildings, is depreciated according to the remaining useful life as referred to in Article 457; and/or
        2. other than buildings whose useful life:
            a) is less than 4 (four) years, is depreciated or amortised at once in the Tax Year the change to the cash basis occurs; and/or
            b) is equal to or more than 4 (four) years, is treated as an acquisition of new assets as well as depreciated or amortised pursuant to the provisions under Article 457.
(2) To the certain Taxpayers referred to in Article 456 paragraph (2) whose Bookkeeping has changed from the cash basis to the accrual basis, the following provisions shall apply:
    a. income and/or expenses that have been recognised when using the cash basis are no longer recognised when using the accrual basis;
    b. income and/or expenses that have not been recognised when using the cash basis but have fulfilled the requirements for income and/or expense recognition based on the accrual basis, the income and/or expenses are recognised immediately in the Tax Year the change into the accrual basis occurs; and/or
    c. the net book value of tangible assets and/or intangible assets will continue to be depreciated and/or amortised pursuant to the

provisions under Article 457 until the end of the useful life or when the assets are transferred.

Article 462

The certain Taxpayers referred to in Article 456 paragraph (2) that in:

a. a Tax Year have maintained Bookkeeping on the cash basis as referred to in Article 456 paragraph (1); and
b. the following Tax Year choose or maintain Bookkeeping based on the applicable financial accounting standards in Indonesia referred to in Article 455 paragraph (1) on the accrual basis,

may no longer maintain Bookkeeping on the cash basis as referred to in Article 456 paragraph (1) in the following Tax Years.

Article 463

The individual Taxpayers referred to in Article 448 paragraph (2) subparagraph a and subparagraph c, that in a Tax Year from the 2022 Tax Year, have maintained Bookkeeping, cannot:

a. maintain recording; and/or
b. calculate their net income using Deemed Profit,

in the following Tax Years.

CHAPTER VIII
TECHNICAL PROVISIONS ON THE IMPLEMENTATION OF THE CORETAX ADMINISTRATION SYSTEM

Article 464

The exercise of tax rights and the fulfilment of tax obligations of Taxpayers for one or more places of business from:

a. the January 2025 Taxable Period; and
b. the Tax Year 2025 for the Land and Building Tax type of tax,

shall be conducted centrally using the Taxpayer Identification Number registered according to the residence or domicile of the Taxpayers.

Article 465

Further provisions on:

a. the types of the electronic and/or non-electronic exercise of tax rights and fulfilment of tax obligations and procedures for the submission of documents as well as channels used in the exercise of tax rights and fulfilment of tax obligations referred to in Article 3;
b. the follow-up to the exercise of tax rights and fulfilment of tax obligations referred to in Article 7 paragraph (9), procedures for the issuance of decisions in the electronic format referred to in Article 11 paragraph (2), Electronic Documents referred to in Article 11 paragraph (6) and procedures for the submission of decisions and Electronic Documents referred to in Article 12;

c. procedures for the exercise of tax rights and fulfilment of tax obligations and the issuance of decisions in the event of force majeure or other causes based on the considerations from the Director General of Taxes;
d. technical instructions for the implementation of Taxpayer registration and the granting of Taxpayer Identification Numbers, data changes, Taxpayer transfer, the determination of Non-active Taxpayers and Taxpayer Identification Number Deregistration;
e. technical instructions for the implementation of business reporting, VAT registration and access for the preparation of Tax Invoices;
f. technical instructions for the implementation of extension activities for the granting of Taxpayer Identification Numbers and/or VAT registration;
g. technical instructions for the implementation of the determination of the residence or domicile of Taxpayers;
h. technical instructions for the implementation of the criteria for Taxable Persons whose access to prepare Tax Invoices is deactivated;
i. technical instructions for the implementation of *ex officio* VAT Deregistration for Taxable Persons that no longer fulfil the requirements as Taxable Persons;
j. the form and format of the Notice of Taxable Objects referred to in Article 79 paragraph (1);
k. Taxpayers in certain regions referred to in Article 99 paragraph (1);
l. procedures for the application of the electronic tax payment system;
m. the form, contents and procedures for the completion of the Tax Payment Slip form referred to in Article 104;
n. procedures for the issuance of the Overbooking Receipt;
o. the form, contents and procedures for the completion of Tax Returns referred to in Article 164;
p. details and/or the documents that must be attached to Tax Returns as well as the format and means of submission of the details and/or the documents that must be attached to Tax Returns referred to in Article 165;
q. procedures for the filing of Tax Returns referred to in Article 168;
r. procedures for the notification of the extension of the Annual Tax Return referred to in Article 174;
s. the criteria for certain Income Tax Taxpayers excluded from the obligation to file Tax Returns referred to in Article 180 paragraph (2);
t. procedures for the examination and recording of Tax Returns referred to in Article 182;
u. procedures for the examination of the fulfilment of the obligation to remit Income Tax by the Tax Office referred to in Article 193 paragraph (8) and Article 195 paragraph (8);
v. procedures for the exclusion from the payment and issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto referred to in Article 200;
w. Article 22 Income Tax collection protocol and procedures in connection with payments of supplies of goods and activities in the field of imports, exports of coal mining commodities, metallic minerals and non-metallic

minerals by Entities or individuals constituting mining business permit holders or business activities in other sectors referred to in Article 217 and procedures for the issuance of the Article 22 Income Tax exemption certificate referred to in Article 219 paragraph (3);

x. the form, contents, procedures for the completion and the filing of the report on the calculation of Article 25 Income Tax instalments referred to in Article 233;

y. Article 26 Withholding Tax on income received or accrued by non-resident Taxpayers other than permanent establishment for income in the form of gains from the sales of shares referred to in Article 238 and Article 239;

z. the implementation of Article 26 Withholding Tax on income in the form of insurance premiums and reinsurance premiums paid to Insurance Companies overseas referred to in Article 241;

aa. procedures for the application for and issuance of decisions on the use of book value for transfers and acquisitions of assets in the context of mergers, consolidations, spin-offs or acquisitions referred to in Article 394 and Article 395,

are stipulated by the Director General of Taxes.

Article 466

Further provisions on:

1. procedures for the payment of tax in United States dollars referred to in Article 106 paragraph (2); and
2. the implementation of procedures for the calculation and tax refunds and interest compensation referred to in Article 155 to Article 160,

are stipulated by the Director General of Taxes and the Director General of the Treasury as per their authority.

Article 467

Further provisions on procedures for the exclusion from Article 22 Income Tax collection referred to in Article 219 paragraph (1) subparagraph b and subparagraph c and paragraph (2) are stipulated by the Director General of Taxes and the Director General of Customs and Excise as per their authority.

CHAPTER IX
SAMPLE FORMAT OF DOCUMENTS AND SAMPLE CALCULATION, COLLECTION AND/OR FILING

Article 468

The sample format of documents in the form of:

a. the statement letter of being not yet able to attach supporting documents for the entries of the Notice of Land and Building Tax Objects referred to in Article 84 paragraph (9) shall be listed in Appendix Letter A;

b. the statement letter of the refusal of Data Collection referred to in Article 92 paragraph (1) shall be listed in Appendix Letter B;

c. the official report of refusal of Data Collection referred to in Article 92 paragraph (2) shall be listed in Appendix Letter C;

d. the application letter for the extension of the settlement period referred to in Article 99 paragraph (5) shall be listed in Appendix Letter D;
e. the decision on approval of the extension of the tax settlement period referred to in Article 99 paragraph (8) shall be listed in Appendix Letter E;
f. the decision on the rejection of the extension of the tax settlement period referred to in Article 99 paragraph (9) shall be listed in Appendix Letter F;
g. the letter for the application for Overbooking referred to in Article 109 paragraph (1) shall be listed in Appendix Letter G;
h. the Overbooking Receipt referred to in Article 111 paragraph (1) subparagraph a shall be listed in Appendix Letter H;
i. the notice of the rejection of the application for overbooking referred to in Article 111 paragraph (1) subparagraph b shall be listed in Appendix Letter I;
j. the application letter for instalments of Article 29 Income Tax payment referred to in Article 114 paragraph (1) shall be listed in Appendix Letter J;
k. the application letter for the deferral of Article 29 Income Tax payment referred to in Article 114 paragraph (1) shall be listed in Appendix Letter K;
l. the application letter for instalment of the payment of tax liabilities referred to in Article 115 paragraph (1) shall be listed in Appendix Letter L;
m. the application letter for the deferral of payment of tax liabilities referred to in Article 115 paragraph (1) shall be listed in Appendix Letter M;
n. the approval of the instalment of tax payment decision letter referred to in Article 117 paragraph (4) subparagraph a for Article 29 Income Tax shall be listed in Appendix Letter N;
o. the approval of the tax deferral decision letter referred to in Article 117 paragraph (4) subparagraph a for Article 29 Income Tax, shall be listed in Appendix Letter O;
p. the approval of the instalment of tax payment decision letter referred to in Article 117 paragraph (4) subparagraph b for tax liabilities, shall be listed in Appendix Letter P;
q. the approval of the deferral of tax payment decision letter referred to in Article 117 paragraph (4) subparagraph b for tax liabilities, shall be listed in Appendix Letter Q;
r. the rejection referred to in Article 117 paragraph (3) in the form of the notice of rejection of the application for the instalment or deferral for Article 29 Income Tax shall be listed in Appendix Letter R;
s. the rejection referred to in Article 117 paragraph (3) in the form of the notification that the application letter for the instalment of the payment of tax liabilities does not fulfil the requirements shall be listed in Appendix Letter S;
t. the rejection referred to in Article 117 paragraph (3) in the form of notification that the application letter for the deferral of payment of tax liabilities does not fulfil the requirements shall be listed in Appendix Letter T;

u. the re-enactment of the decision on approval of instalment of tax payment decision letter referred to in Article 119 paragraph (2) shall be listed in Appendix Letter U;
v. the re-enactment of the approval of deferral of the tax payment decision letter referred to in Article 119 paragraph (2) shall be listed in Appendix Letter V;
w. the application for the refund of tax overpayment that should not otherwise be payable referred to in Article 124 paragraph (3), Article 127 paragraph (3), Article 131 paragraph (1) and Article 135 paragraph (1) shall be listed in Appendix Letter W;
x. the power of attorney for the refund of Income Tax overpayment that should not otherwise be payable from the withholdee or the party subject to the collection referred to in Article 131 paragraph (2) subparagraph d and Article 135 paragraph (2) subparagraph d shall be listed in Appendix Letter X;
y. the supporting documents for non-tax residents receiving or accruing income related to the Tax Treaty referred to in Article 135 paragraph (2) subparagraph h shall be listed in Appendix Letter Y;
z. the notice of rejection of the application for the refund of tax overpayment that should not otherwise be payable referred to in Article 125 paragraph (6), Article 128 paragraph (6), Article 132 paragraph (8) and Article 136 paragraph (6) shall be listed in Appendix Letter Z;
aa. the Interest Compensation Decision Letter referred to in Article 147 paragraph (1) shall be listed in Appendix Letter AA;
bb. the notification that the Interest Compensation Decision Letter is not issued referred to in Article 147 paragraph (3), shall be listed in Appendix Letter BB;
cc. the calculation memo for the granting of interest compensation referred to in Article 147 paragraph (5) shall be listed in Appendix Letter CC;
dd. the calculation memo for the tax overpayment referred to in Article 156 paragraph (1) shall be listed in Appendix Letter DD;
ee. the Tax Refund Decision Letter referred to in Article 157 paragraph (1) shall be listed in Appendix Letter EE;
ff. the request for confirmation of the set-off of tax overpayment against the Tax Liabilities of another Taxpayer and/or Tax Deposit referred to in Article 154 paragraph (3) shall be listed in Appendix Letter FF;
gg. the Tax Return Not Issued the Disbursement of Refund Claim or Payment Order for Interest Compensation and request to update the account number referred to in Article 158 paragraph (2) shall be listed in Appendix Letter GG;
hh. the report of Government Agencies or officials performing the payments or officials approving the exchange referred to in Article 198 paragraph (1) shall be listed in Appendix Letter HH;
ii. the list of parties transferring the right to land and/or building transferred to State-Owned Enterprises or local-owned enterprises based on special assignments referred to in Article 198 paragraph (2) subparagraph a and reports of State-Owned Enterprises or local-owned enterprises that

obtain special assignments referred to in Article 198 paragraph (2) subparagraph b shall be listed in Appendix Letter II;

jj. the monthly report of conveyancers and the monthly report on the preparation of the auction report on land and/or buildings referred to in Article 198 paragraph (3) shall be listed in Appendix Letter JJ;

kk. the report on the amendments or addendum to the land and/or building sale and purchase agreement referred to in Article 198 paragraph (4) shall be listed in Appendix Letter KK;

ll. the notice concerning the transfer of Real Estate to a Special Purpose Company or Collective Investment Contract in a certain Collective Investment Contract scheme referred to in Article 204 subparagraph a shall be listed in Appendix Letter LL;

mm. the Monthly reports on the issuance of deed, decision, agreement or auction report on the transfer of Real Estate referred to in Article 207 paragraph (3) shall be listed in Appendix Letter MM;

nn. the Participating Interest transfer report form referred to in Article 211 paragraph (4), shall be listed in Appendix Letter NN;

oo. the official report of handover of the payment of Income Tax in the form of oil and/or gas volume referred to in Article 259 paragraph (1) shall be listed in Appendix Letter OO;

pp. the Tax Payment Slip for the payment of Income Tax in the form of oil and/or gas volume referred to in Article 259 paragraph (4) shall be listed in Appendix Letter PP;

qq. the export declaration for intangible Taxable Goods or exports of Taxable Services referred to in Article 284 paragraph (3) shall be listed in Appendix Letter QQ;

rr. the goods return note referred to in Article 288 paragraph (1) shall be listed in Appendix Letter RR;

ss. the credit note referred to in Article 289 paragraph (1) shall be listed in Appendix Letter SS;

tt. the investment realisation report referred to in Article 374 paragraph (1) shall be listed in Appendix Letter TT;

uu. the letter of submission for the Investment/production realisation report, Investment realisation report and filing the amount of production realisation activities referred to in Article 420 paragraph (1) shall be listed in Appendix Letter UU;

vv. the letter of submission of the reports on the number of Indonesian worker realisation and/or investment realisation, the report on the number of the employment of Indonesian workforce realisation and the Investment realisation report referred to in Article 428 paragraph (1) shall be listed in Appendix Letter W;

ww. the letter of submission of the Research and Development expenses report for each Tax Year and report on the details of the expenses for Research and Development activities for each Tax Year referred to in Article 439 paragraph (1) shall be listed in Appendix Letter WW;

xx. the letter of submission of the report on the calculation of the utilisation of gross income reduction and the report on the calculation of the

utilisation of additional gross income reduction for Research and Development activities referred to in Article 440 paragraph (6) shall be listed in Appendix Letter XX;

yy. the application to be subject to Income Tax only on income received or accrued from Indonesia referred to in Article 446 paragraph (1) shall use the format listed in Appendix Letter YY;

zz. the approval letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia referred to in Article 446 paragraph (4) subparagraph a shall be listed in Appendix Letter ZZ;

aaa. the rejection letter for the application for the imposition of Income Tax only on income received or accrued from Indonesia referred to in Article 446 paragraph (4) subparagraph b shall be listed in Appendix Letter AAA;

bbb. the notification of Bookkeeping on the cash basis referred to in Article 458 paragraph (1) shall be listed in Appendix Letter BBB;

ccc. the certificate of Bookkeeping on the cash basis referred to in Article 459 paragraph (1), shall be listed in Appendix Letter CCC;

which constitute an integral part of this Ministerial Regulation.

Article 469

The sample calculation, collection and/or filing of:

a. Income Tax on income from the transfer of the right to land and/or building as well as land and/or building sale and purchase agreement as well as the amendments thereto referred to in Article 191 paragraph (1) shall be listed in Appendix Letter DDD;

b. the tax on income of Oil and Gas Contractors of Cooperation Contracts in the form of Uplift or other similar fees referred to in Article 208 paragraph (1) and Article 216 paragraph (1) shall be listed in Appendix Letter EEE;

c. Article 25 Income Tax Instalments for bank Taxpayers referred to in Article 227 shall be listed in Appendix Letter FFF;

d. Article 25 Income Tax Instalments for Other Taxpayers and public-listed Taxpayers referred to in Article 228 shall be listed in Appendix Letter GGG;

e. Article 25 Income Tax Instalments for New Taxpayers in the context of mergers, consolidations and/or acquisitions referred to in Article 236 paragraph (1) shall be listed in Appendix Letter HHH;

f. Article 25 Income Tax Instalments for Taxpayers in the context of spin-offs referred to in Article 236 paragraph (2) shall be listed in Appendix Letter III;

g. Article 25 Income Tax Instalments for New Taxpayers resulting from the changes in the form of business entities referred to in Article 236 paragraph (4) shall be listed in Appendix Letter JJJ;

h. Article 25 Income Tax Instalments for New Taxpayers referred to in Article 237 shall be listed in Appendix Letter KKK;

i. Value Added Tax by Insurance Companies, Sharia Insurance Companies, reinsurance companies or sharia reinsurance companies as Value Added Tax Collection Agents referred to in Article 316 paragraph (1) and paragraph (2) shall be listed in Appendix Letter LLL;

j. Periodic Value Added Tax Returns by Insurance Agents referred to in Article 318 paragraph (1), paragraph (2) and paragraph (3) shall be listed in Appendix Letter MMM;
k. self-building activities conducted simultaneously or in stages referred to in Article 323 paragraph (5) shall be listed in Appendix Letter NNN;
l. Value Added Tax referred to in Article 343 paragraph (1) and Article 22 Income Tax referred to in Article 358 paragraph (9) on the buying and selling of Crypto Assets shall be listed in Appendix Letter OOO;
m. Dividends of Taxpayers that produce products other than those granted facilities or conduct spin-offs referred to in Article 417 paragraph (2) and paragraph (3) shall be listed in Appendix Letter PPP;
n. the formula for the calculation of the loss carry-forward for Taxpayers that obtain the additional loss carry-forward period facility referred to in Article 418 paragraph (3) shall be listed in Appendix Letter QQQ;
o. the net income reduction value in the event of a replacement of assets referred to in Article 421 paragraph (3) shall be listed in Appendix Letter RRR;
p. the average Indonesian workers in a Tax Year referred to in Article 423 paragraph (4) shall be listed in Appendix Letter SSS;
q. the amount of the additional Gross Income reduction and additional charging of the income reduction for Research and Development activities referred to in Article 435 shall be listed in Appendix Letter TTT; and
r. the imposition of Income Tax only on income received or accrued from Indonesia referred to in Article 447 paragraph (2) shall be listed in Appendix Letter UUU;

which constitute an integral part of this Ministerial Regulation.

Article 470

Further provisions on:
a. the submission of the investment realisation report referred to in Article 374 paragraph (1) shall be listed in Appendix Letter VVV;
b. Input VAT crediting in different Taxable Periods referred to in Article 376 paragraph (1) shall be listed in Appendix Letter WWW;
c. Input VAT crediting for Value Added Tax listed in the Tax Invoice prepared by including the identity of individual Taxable Person as the buyer of Taxable Goods or Recipient of Taxable Services in the form of the name, address and National Identification Number referred to in Article 377 paragraph (2) shall be listed in Appendix Letter XXX;
d. Input VAT crediting before the entrepreneur is registered as a Taxable Person referred to in Article 378 paragraph (3) shall be listed in Appendix Letter YYY;
e. Input VAT crediting which is not filed in the Periodic Value Added Tax Returns notified and/or discovered at the time an Audit is conducted referred to in Article 380 paragraph (1) shall be listed in Appendix Letter ZZZ;
f. Input VAT crediting collected with the issuance of tax assessment referred to in Article 381 paragraph (1) shall be listed in Appendix Letter AAAA;

g. certain business sectors in certain regions with certain requirements that may be granted the net income reduction facility referred to in Article 423 paragraph (3) subparagraph b shall be listed in Appendix Letters BBBB;
h. the list of focus and themes of priority Research and Development activities that may be granted facilities referred to in Article 434 paragraph (1) subparagraph d shall be listed in Appendix Letter CCCC;
i. certain job positions for Foreign Nationals with certain skills referred to in Article 443 paragraph (1) shall be listed in Appendix subparagraph DDDD,

which constitute an integral part of this Ministerial Regulation.

Article 471

Further provisions on certain goods referred to in Article 218 paragraph (1) subparagraph a number 1 point a), certain other goods referred to in Article 218 paragraph (1) subparagraph a number 1 point b), goods in the form of soybeans, wheat and wheat flour referred to in Article 218 paragraph (1) subparagraph a number 1 point c) and coal mining commodities, metallic minerals and non-metallic minerals, according to the description of goods and harmonized system referred to in Article 218 paragraph (1) subparagraph a number 2 shall be listed in Appendix Letter EEEE which constitutes an integral part of this Ministerial Regulation.

CHAPTER X
TRANSITIONAL PROVISIONS

Article 472

When this Ministerial Regulation comes into force:

1. Electronic Certificates, electronic filing identification numbers and verification codes issued by the Directorate General of Taxes may be used to perform the uncertified Electronic Signatures referred to in this Ministerial Regulation in the exercise of rights and the fulfilment of obligations for:
   a. Taxable Periods until the December 2024 Taxable Period;
   b. the Fraction of a Tax Year until the Fraction of a Tax Year ending in December 2024; and/or
   c. the Tax Year until the 2024 Tax Year;
2. the issuance, signing and delivery of decisions in the electronic format issued by the Minister and the Director General of Taxes using uncertified Electronic Signatures may be conducted for decisions for:
   a. Taxable Periods until the December 2024 Taxable Period;
   b. the Fraction of a Tax Year until the Fraction of a Tax Year ending in December 2024; and/or
   c. the Tax Year until the 2024 Tax Year;
3. the use of Electronic Seal for the signing of decisions in the electronic format referred to in Article 11 must be implemented no later than from 1 January 2025; and

4. the means for activating the Taxpayer Account and the use of Electronic Certificates as well as Authorisation Code in the electronic exercise of tax rights and fulfilment of tax obligations must be available no later than starting 1 January 2025.

Article 473

When this Ministerial Regulation comes into force:

1. the application for Taxpayer registration, changes in Taxpayer data, Taxpayer transfer, the determination of non-effective Taxpayers and Taxpayer Identification Number Deregistration that has been submitted by Taxpayers but has not been settled until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 147/PMK.03/2017 concerning Procedures for the Registration of Taxpayers and Deregistration of Taxpayer Identification Numbers as Well as VAT Registration and Deregistration;
2. the application for VAT registration and VAT Deregistration that has been submitted by Taxpayers but has not been settled until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 147/PMK.03/2017 concerning Procedures for the Registration of Taxpayers and Deregistration of Taxpayer Identification Numbers as Well as VAT Registration and Deregistration;
3. for the temporary deactivation of the Electronic Certificate of Taxable Persons due to failure to file Periodic Value Added Tax Returns pursuant to the Minister of Finance Regulation Number 147/PMK.03/2017 concerning Procedures for the Registration of Taxpayers and Deregistration of Taxpayer Identification Numbers as Well as VAT Registration and Deregistration, the Taxable Persons concerned are granted access for the preparation of Tax Invoices pursuant to this Ministerial Regulation; and
4. the application for Registration of Land and Building Tax objects and the application for changes in the Certificate of Registration of Land and Building Tax data which has been submitted by Taxpayers but has not been settled until this Ministerial Regulation comes into force shall be implemented pursuant to this Ministerial Regulation in a period of:
    a. 10 (ten) business days from the time this Ministerial Regulation comes into force for the application for Registration of Land and Building Tax objects; and
    b. 3 (three) business days from the time this Ministerial Regulation comes into force for the application for changes in the Certificate of Land and Building Tax Registration data.

Article 474

The provisions on the application, notification, filing and submission of documents by Taxpayers implemented pursuant to statutory provisions in the

field of taxation before the entry into force of this Ministerial Regulation, shall remain valid until this Ministerial Regulation comes into force.

Article 475

The provisions on the issuance, delivery and delegation of authority over decisions and documents implemented by the Minister or the Director General of Taxes pursuant to statutory provisions in the field of taxation before the entry of force of this Ministerial Regulation, shall remain valid until this Ministerial Regulation comes into force.

Article 476

When this Ministerial Regulation comes into force:

1. the due date for tax payment or remittance for the calculation of administrative penalties stipulated under Article 9 paragraph (2a) and Article 8 paragraph (2a) of the General Provisions and Tax Procedures Law for the Taxable Periods before this Ministerial Regulation comes into force, shall be implemented pursuant to the Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes as amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures;
2. the application for Overbooking that has been submitted by Taxpayers but have not been completed until this Ministerial Regulation comes into force shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes as amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures;
3. the application for deferral and instalments that has not been settled until this Ministerial Regulation comes into force shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes as amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures;
4. the application for the refund of tax overpayment that should not otherwise be payable that has not been settled until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 187/PMK.03/2015 concerning Procedures for Refunds of Tax Overpayment That Should Not Be Otherwise Payable in a maximum period

of 1 (one) month from the time this Ministerial Regulation comes into force;

5. the application for Land and Building Tax refund that has not been settled until this Ministerial Regulation comes into force shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 17/PMK.03/2011 concerning the Application for Land and Building Tax Refund within a maximum period of 1 (one) month from the time this Ministerial Regulation comes into force;
6. the granting of interest compensation and the application for the granting of the interest compensation that have not been settled until before this Ministerial Regulation comes into force, based on assessments, decisions or rulings, issued or pronounced:
   a. before 2 November 2020, shall be settled pursuant to the provisions under the Minister of Finance Number 226/PMK.03/2013 concerning Procedures for the Calculation and the Granting of Interest Compensation as amended several times, last amended by the Minister of Finance Regulation constituting the provisions under Regulation Number 65/PMK.03/2018; or
   b. from 2 November 2020, shall be settled pursuant to the provisions under this Ministerial Regulation,

   and the settlement period of the granting of interest compensation is a maximum of 1 (one) month from the date the application submitted from the time this Ministerial Regulation comes into force, is completely received by the Tax Office; and
7. the application for the granting of the interest compensation for which the Interest Compensation Decision Letter has been issued but the Interest Compensation Decision Letter has not been issued until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under this Ministerial Regulation.

Article 477

When this Ministerial Regulation comes into force:

1. the types, forms and contents of Tax Returns, filing of Tax Returns as well as processing of Tax Returns other than Periodic Stamp Duty Tax Returns for:
   a. Taxable Periods until the December 2024 Taxable Period;
   b. the Fraction of a Tax Year until the Fraction of a Tax Year ending in December 2024; and/or
   c. the Tax Year until the 2024 Tax Year;

   shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 243/PMK.03/2014 concerning Tax Returns (SPT) as amended several times, last amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures;

2. the types, forms and contents of Tax Returns, filing of Tax Returns as well as processing of Tax Returns for Periodic Stamp Duty Tax Returns for Taxable Periods until the December 2024 Taxable Period shall be implemented pursuant to the provisions under this Ministerial Regulation;
3. Taxpayers that:
   a. transfer the right to land and/or building and payments of the transfer have been settled before 7 September 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
   b. income for the transfer of the right referred to in letter a has been filed in the Annual Income Tax Return for the Tax Year concerned and Income Tax on the income has been settled pursuant to the tax provisions applicable in the period of the transfer of the right to land and building,

   shall be excluded from the imposition of Income Tax pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto with the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto;
4. Taxpayers that:
   a. transfer the right to land and/or building and payments of the transfer have only been partially settled before 7 September 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
   b. income for the transfer of the right referred to in letter a has been filed in the Annual Income Tax Return for the Tax Year concerned and Income Tax on the income has been settled pursuant to the tax provisions applicable in the period of the transfer of the right to land and building,

   shall be excluded from the imposition of Income Tax pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto with the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto by remitting Income Tax on the fraction of the settlement of the payments of the transfer from 7 September 2016 pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto;
5. Taxpayers that:

a. transfer the right to land and/or building before 7 September 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
b. income for the transfer of the right referred to in letter a has not been filed in the Annual Income Tax Return for the Tax Year concerned,

shall be subject to Income Tax pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto, with the tax base amounting to the transaction value at the time the deed, decision, contract, agreement or auction report is prepared by the competent authority;

6. Taxpayers that:
   a. transfer the right to land and/or building and payments of the transfer have been settled before 7 September 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
   b. the fulfilment of Income Tax obligations for income from the transfer of the right to land and/or building referred to in letter a has not been fully implemented pursuant to tax provisions applicable in the period of transfer of the right to land and/or building; and
   c. income from the transfer of the right to land and/or building referred to in letter b has been filed in the Annual Income Tax Return for the Tax Year concerned,

   shall be excluded from the imposition of Income Tax pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto with the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto by remitting Income Tax underpayment pursuant to the tax provisions applicable in the period of the transfer of the right to land and building;
7. to the imposition of Income Tax on income from land and/or building sale and purchase agreement as well as the amendments thereto, the provision that income from the buyer whose name is listed in the sale and purchase agreement before the amendment or addendum to the sale and purchase agreement shall apply wherein:
   a. the amendment or addendum to the sale and purchase contract conducted before 7 September 2016, shall be subject to Income Tax based on the rates under Article 17 or Article 26 of the Income Tax Law; or
   b. the amendment or addendum to the sale and purchase agreement contract conducted on 7 September 2016 and/or thereafter, shall be subject to Income Tax pursuant to Government Regulation Number 34 of 2016 concerning Income Tax on Income from the Transfer of

the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto;

8. Taxpayers that:
   a. transfer Real Estate to Special Purpose Companies or Collective Investment Contract in Certain Collective Investment Contract schemes and payments of the transfer have been settled before 17 October 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
   b. income from the transfer referred to in letter a has been filed in the Annual Income Tax Return for the Tax Year concerned and Income Tax on the income has been settled pursuant to the tax provisions applicable in the period of the transfer of the right to land and building,

   shall be excluded from the imposition of Income Tax pursuant to Government Regulation Number 40 of 2016 concerning Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes with the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto;
9. Taxpayers that:
   a. transfer Real Estate to Special Purpose Companies or Collective Investment Contracts in Certain Collective Investment Contract schemes and payments of the transfer have only been partially settled before 17 October 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
   b. income from the transfer of the right referred to in letter a has been filed in the Annual Income Tax Return for the Tax Year concerned and Income Tax on the income has been settled pursuant to the tax provisions applicable in the period of the transfer of the right to land and building,

   shall be excluded from the imposition of Government Regulation Number 40 of 2016 concerning Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes using the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto by remitting Income Tax on the fraction of the settlement of the payments of the transfer from 17 October 2016 pursuant to Government Regulation Number 40 of 2016 concerning Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes;
10. Taxpayers that:
    a. transfer Real Estate to Special Purpose Companies or Collective Investment Contracts in Certain Collective Investment Contract schemes before 17 October 2016 and for the transfer of the right, no

deed, decision, contract, agreement or auction report has been prepared by the competent authority; and

b. income from the transfer of the right to land and/or building referred to in letter a has not been filed in the Annual Income Tax Return for the Tax Year concerned,

shall be subject to Income Tax pursuant to Government Regulation Number 40 of 2016 concerning Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes as well as the amendments thereto, with the tax base amounting to the transaction value at the time the deed, decision, contract, agreement or auction report is prepared by the competent authority;

11. Taxpayers that:
    a. transfer Real Estate to Special Purpose Companies or Collective Investment Contracts in Certain Collective Investment Contract schemes and payments of the transfer have been settled before 17 October 2016 and for the transfer of the right, no deed, decision, contract, agreement or auction report has been prepared by the competent authority; and
    b. the fulfilment of Income Tax obligations for income from the transfer of the right to land and/or building referred to in letter a has not been fully implemented pursuant to tax provisions applicable in the period of transfer of the right to land and/or building; and
    c. income from the transfer of the right to land and/or building referred to in subparagraph b has been filed in the Annual Income Tax Return for the Tax Year concerned,

    shall be excluded from the imposition of Income Tax pursuant to Government Regulation Number 40 of 2016 concerning Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes as well as the amendments thereto using the issuance of an Income Tax exemption certificate for income from the transfer of the right to land and/or building or land and/or building sale and purchase agreement as well as the amendments thereto by remitting the Income Tax underpayment pursuant to the tax provisions applicable in the period of the transfer of the right to land and building,;
12. Value Added Tax payable on self-building activities for the Taxable Period before the entry of force of this Ministerial Regulation, the calculation, remittance and filing of Value Added Tax on self-building activities concerned shall be conducted pursuant to the Ministerial Regulation stipulating Value Added Tax on Self-Building Activities applicable in the Taxable Period; and
13. the Value Added Tax rate used in the calculation of Value Added Tax payable on self-building activities shall use the Value Added Tax rate applicable at the time Value Added Tax on self-building activities concerned is remitted.

Article 478

When this Ministerial Regulation comes into force:

1. the application for the use of book value for mergers, consolidations, spin-offs or acquisitions that has been submitted by Taxpayers but has not been settled until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 52/PMK.010/2017 concerning the use of book value for transfers and acquisitions of assets in the context of mergers, consolidations, spin-offs or acquisitions as amended several times, last amended by the Minister of Finance Regulation Number 56/PMK.010/2021 concerning the second amendment to the Minister of Finance Regulation Number 52/PMK.010/2017 concerning the use of book value for transfers and acquisitions of assets in the context of mergers, consolidations, spin-offs or acquisitions;
2. for:
   a. the application for the granting of Income Tax facilities referred to in Article 411 and the application for the utilisation of Income Tax facilities referred to in Article 415 that have been submitted by Taxpayers but have not been settled until this Ministerial Regulation comes into force; and
   b. the application for the utilisation of Income Tax facilities referred to in Article 415 submitted after this Ministerial Regulation comes into force by Taxpayers that has obtained notification of approval of the granting of Income Tax facilities referred to in Article 412 before this Ministerial Regulation comes into force,

   shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions as amended by the Minister of Finance Regulation Number 96/PMK.010/2020 concerning the Amendment to the Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions;
3. for:
   a. the application for the granting of Income Tax facilities referred to in Article 425 and the application for the utilisation of Income Tax facilities referred to in Article 427 that have been submitted by Taxpayers but have not been settled until this Ministerial Regulation comes into force; and
   b. the application for the utilisation of Income Tax facilities referred to in Article 427 submitted after this Ministerial Regulation comes into force by Taxpayers that have obtained notification of approval of the granting of Income Tax facilities referred to in Article 426 before this Ministerial Regulation comes into force,

shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 16/PMK.010/2020 concerning the Granting of Net Income Reduction Facility for New Investments or Business Spin-Offs in Certain Business Sectors Constituting Labour-Intensive Industries; and

4. the application by Foreign Nationals who choose to be subject to Income Tax only on income received or accrued from Indonesia referred to in Article 446 that has been submitted by Taxpayers but has not been settled until this Ministerial Regulation comes into force, shall be implemented pursuant to the provisions under the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures.

CHAPTER XI
CLOSING PROVISIONS

Article 479

When this Ministerial Regulation comes into force, the implementing regulations of the Minister of Finance Regulation Number 147/PMK.03/2017 concerning Procedures for the Registration of Taxpayers and Deregistration of Taxpayer Identification Numbers as Well as VAT Registration and Deregistration (Official Gazette of the Republic of Indonesia of 2017 Number 1516) are declared to remain valid insofar as they do not contradict the provisions under this Ministerial Regulation.

Article 480

When this Ministerial Regulation comes into force, the implementing regulations of the Minister of Finance Regulation Number 48/PMK.03/2021 concerning Procedures for the Registration, Filing and Data Collection on Land and Building Tax Objects (Official Gazette of the Republic of Indonesia of 2021 Number 519) are declared to remain valid insofar as they do not contradict the provisions under this Ministerial Regulation.

Article 481

When this Ministerial Regulation comes into force:

1. the implementing regulations of Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes (Official Gazette of the Republic of Indonesia of 2014 Number 1973) as amended several times, last amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153); and
2. provisions related to procedures for tax payment and remittance as well as due dates for tax payment and remittance stipulated under the Minister

of Finance Regulation or Minister of Finance Decree other than the Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes (Official Gazette of the Republic of Indonesia of 2014 Number 1973) as amended several times, last amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153),

are declared to remain valid insofar as they do not contradict the provisions under this Ministerial Regulation.

Article 482

When this Ministerial Regulation comes into force:

1. the implementing regulations of Minister of Finance Regulation Number 243/PMK.03/2014 concerning Tax Returns (SPT) (Official Gazette of the Republic of Indonesia of 2014 Number 1974) as amended several times, last amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153); and
2. provisions related to the types, forms and contents of Tax Returns as well as procedures for the filing and filing due date for Tax Returns stipulated under the Minister of Finance Regulation or Minister of Finance Decree other than Minister of Finance Regulation Number 243/PMK.03/2014 concerning Tax Returns (SPT) (Official Gazette of the Republic of Indonesia of 2014 Number 1974) as amended several times, last amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153),

are declared to remain valid insofar as they do not contradict the provisions under this Ministerial Regulation.

Article 483

When this Ministerial Regulation comes into force:

1. Minister of Finance Decree Number 624/KMK.04/1994 concerning Article 26 Withholding Tax on Income In the form of Insurance Premiums and Reinsurance Premiums Paid to Insurance Companies Overseas;
2. Minister of Finance Decree Number 282/KMK.04/1997 concerning the Implementation of Income Tax Collection on Income from Sales of Shares Transactions on the Stock Exchange;

3. Minister of Finance Decree Number 434/KMK.04/1999 concerning Article 26 Withholding Tax on Income Received or Accrued by Non-Resident Taxpayers Other Than Permanent Establishments on Income in the Form of Gains from the Sales of Shares;
4. Article 7 paragraph (2) and paragraph (3) of the Minister of Finance Regulation Number 196/PMK.03/2007 concerning Procedures for Bookkeeping Using Foreign Languages and Currencies Other Than Rupiah and the Obligation to File Annual Corporate Income Tax Returns as amended several times, last amended by the Minister of Finance Regulation Number 123/PMK.03/2019 concerning the Third Amendment to the Minister of Finance Regulation Number 196/PMK.03/2007 concerning Procedures for Bookkeeping Using Foreign Languages and Currencies Other Than Rupiah and the Obligation to File Annual Corporate Income Tax Returns Corporate Taxpayers (Official Gazette of the Republic of Indonesia of 2019 Number 975);
5. Article 6 paragraph (2) of the Minister of Finance Regulation Number 40/PMK.03/2010 concerning Procedures for the Calculation, Collection, Remittance and Filing of Value Added Tax on the Utilisation of Intangible Taxable Goods and/or Taxable Services from Outside the Customs Territory (Official Gazette of the Republic of Indonesia of 2010 Number 96);
6. Minister of Finance Regulation Number 65/PMK.03/2010 concerning Procedures for the Reduction of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods on Returned Taxable Goods and Value Added Tax on Cancelled Taxable Services (Official Gazette of the Republic of Indonesia of 2010 Number 141);
7. Minister of Finance Regulation Number 73/PMK.03/2010 concerning the Appointment of Oil and Gas Concession Contractors of Cooperation Contracts and Contractors or Permit Holders/Geothermal Resource Concession Permit Holders to Collect, Remit and File Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods as Well as Procedures for the Collection, Remittance and Filing (Official Gazette of the Republic of Indonesia of 2010 Number 156);
8. Article 5 paragraph (3) of the Minister of Finance Regulation Number 111/PMK.03/2010 concerning Procedures for the Withholding, Remittance and Filing of Income Tax on Dividends Received or Accrued by Resident Individual Taxpayers (Official Gazette of the Republic of Indonesia of 2010 Number 278);
9. Article 6 paragraph (3) of the Minister of Finance Regulation Number 112/PMK.03/2010 concerning Minister of Finance Regulation concerning Procedures for the Withholding, Remittance and Filing of Income Tax on Interest on Deposits Paid by Cooperatives to Individual Cooperative Members (Official Gazette of the Republic of Indonesia of 2010 Number 279);
10. Article 6 paragraph (3) of the Minister of Finance Regulation Number 112/PMK.03/2010 concerning Minister of Finance Regulation concerning Procedures for the Withholding, Remittance and Filing of Income Tax on

Interest on Deposits Paid by Cooperatives to Individual Cooperative Members (Official Gazette of the Republic of Indonesia of 2010 Number 279);

11. Minister of Finance Regulation Number 17/PMK.03/2011 concerning the Application for Land and Building Tax Refund (Official Gazette of the Republic of Indonesia of 2011 Number 36);
12. Article 8 paragraph (3) of the Minister of Finance Regulation Number 85/PMK.03/2011 concerning Procedures for the Withholding, Remittance and Filing of Income Tax on Bond Interest (Official Gazette of the Republic of Indonesia of 2011 Number 307) as amended by the Minister of Finance Regulation Number 7/PMK.011/2012 concerning the Amendment to the Minister of Finance Regulation Number 85/PMK.03/2011 concerning Procedures for the Withholding, Remittance and Filing of Income Tax on Bond Interest (Official Gazette of the Republic of Indonesia of 2012 Number 67);
13. Minister of Finance Regulation Number 257/PMK.011/2011 concerning Procedures for Withholding Tax and Payment of Income Tax on Contractors' Other Income In the Form of Uplift or Other Similar Fees and/or Contractors' Income from transfers of Participating Interest (Official Gazette of the Republic of Indonesia of 2011 Number 946);
14. Minister of Finance Regulation Number 79/PMK.02/2012 concerning Procedures for the Remittance and Filing of State revenues from Upstream Oil and/or Gas Business Activities and Calculation of Income Tax for the Payment of Oil and/or Gas Income Tax in the Form of Oil and/or Gas Volume (Official Gazette of the Republic of Indonesia of 2012 Number 544) as amended by PMK-70/PMK.02/2015 concerning the Amendment to the Minister of Finance Regulation Number 79/PMK.02/2012 concerning Procedures for the Remittance and Filing of State revenues from Upstream Oil and/or Gas Business Activities and Calculation of Income Tax for the Payment of Oil and/or Gas Income Tax in the Form of Oil and/or Gas Volume (Official Gazette of the Republic of Indonesia of 2015 Number 482);
15. Article 23 and 24 of the Minister of Finance Regulation Number 76/PMK.03/2013 concerning the Administration of Land and Building Tax in the Mining Sector on Oil, Gas and Geothermal Mining (Official Gazette of the Republic of Indonesia of 2013 Number 573) as amended several times, last amended by the Minister of Finance Regulation Number 131/PMK.03/2017 concerning the Second Amendment to the Minister of Finance Regulation Number 76/PMK.03/2013 concerning the Administration of Land and Building Tax in the Mining Sector on Oil, Gas and Geothermal Mining (Official Gazette of the Republic of Indonesia of 2017 Number 1381);
16. Minister of Finance Regulation Number 242/PMK.03/2014 concerning Procedures for the Payment and Remittance of Taxes (Official Gazette of the Republic of Indonesia of 2014 Number 1973) as amended by the Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the

Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153);

17. Minister of Finance Regulation Number 243/PMK.03/2014 concerning Tax Returns (SPT) (Official Gazette of the Republic of Indonesia of 2014 Number 1974) as amended by the Minister of Finance Regulation Number Minister of Finance Regulation Number 18/PMK.03/2021 concerning the Implementation of Law Number 11 of 2020 concerning Job Creation in the Field of Income Tax, Value Added Tax and Sales Tax on Luxury Goods as Well as General Provisions and Tax Procedures (Official Gazette of the Republic of Indonesia of 2021 Number 153);
18. Minister of Finance Regulation Number 187/PMK.03/2015 concerning Procedures for Refunds of Tax Overpayment That Should Not Be Otherwise Payable (Official Gazette of the Republic of Indonesia of 2015 Number 1471);
19. Article 4 and Article 5 of the Minister of Finance Regulation of the Republic of Indonesia Number 200/PMK.03/2015 concerning the Tax Treatment of Taxpayers and Taxable Persons that Use Certain Collective Investment Contract Schemes in the Context of Financial Sector Deepening (Official Gazette of the Republic of Indonesia of 2015 Number 1692);
20. Minister of Finance Regulation Number 244/PMK.03/2015 concerning Procedures for Procedures for the Calculation and Refunds of Tax Overpayment (Official Gazette of the Republic of Indonesia of 2015 Number 1964);
21. Minister of Finance Regulation Number 261/PMK.03/2016 concerning Procedures for the Remittance, Filing and Exclusion from the Imposition of Income Tax on Income from the Transfer of the Right to Land and/or Building and Land and/or Building Sale and Purchase Agreements and Amendments Thereto (Official Gazette of the Republic of Indonesia of 2017 Number 29);
22. Minister of Finance Regulation Number 34/PMK.010/2017 concerning the Collection of Article 22 Income Tax in Respect of Payment of Supplies of Goods and Activities in the Import Sector or Businesses in Other Sectors (Official Gazette of the Republic of Indonesia of 2017 Number 361) as amended several times, last amended by the Minister of Finance Regulation Number 41/PMK.010/2022 concerning the Second Amendment to the Minister of Finance Regulation Number 34/PMK.010/2017 concerning the Collection of Article 22 Income Tax in Respect of Payment of Supplies of Goods and Activities in the Import Sector or Businesses in Other Sectors (Official Gazette of the Republic of Indonesia of 2022 Number 341);
23. Minister of Finance Regulation Number 37/PMK.03/2017 concerning Procedures for the Payment and Filing of Income Tax on Income from the Transfer of Real Estate in Certain Collective Investment Contract Schemes (Official Gazette of the Republic of Indonesia of 2017 Number 374);
24. Minister of Finance Regulation Number 52/PMK.010/2017 concerning the Use of Book Value for Transfers and Acquisitions of Assets in the

Context of Mergers, Consolidations, Spin-Offs or Acquisitions (Official Gazette of the Republic of Indonesia of 2017 Number 586) as amended several times, last amended by the Minister of Finance Regulation Number 56/PMK.010/2021 concerning the Second Amendment to the Minister of Finance Regulation Number 52/PMK.010/2017 concerning the Use of Book Value for Transfers and Acquisitions of Assets in the Context of Mergers, Consolidations, Spin-Offs or Acquisitions (Official Gazette of the Republic of Indonesia of 2021 Number 637);

25. Minister of Finance Regulation Number 147/PMK.03/2017 concerning Procedures for the Registration of Taxpayers and Deregistration of Taxpayer Identification Numbers as Well as VAT Registration and Deregistration (Official Gazette of the Republic of Indonesia of 2017 Number 1516);
26. Minister of Finance Regulation Number 166/PMK.03/2018 concerning the Appointment of Special Mining Business Permits for Production Operations Holders to Collect, Remit and File Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods as Well as Procedures for the Collection, Remittance and Filing (Official Gazette of the Republic of Indonesia of 2018 Number 1682);
27. Minister of Finance Regulation Number 215/PMK.03/2018 concerning the Calculation of Income Tax Instalments in the Current Tax Year that Must Be Self-Paid by New Taxpayers, Banks, State-Owned Enterprises, Local-Owned State Enterprises, Public-Listed Taxpayers, Other Taxpayers That Pursuant to Provisions Are Required to Prepare Periodic Financial Statements and Certain Entrepreneur Individual Taxpayers (Official Gazette of the Republic of Indonesia of 2018 Number 1860);
28. Minister of Finance Regulation Number 32/PMK.010/2019 concerning the Threshold of Activities and Types of Taxable Services Whose Exports Are Subject to Value Added Tax (Official Gazette of the Republic of Indonesia of 2019 Number 354);
29. Minister of Finance Regulation Number 120/PMK.03/2019 concerning Procedures for the Submission and Settlement of the Request for Refunds of Value Added Tax on Baggage of Individuals Holding Foreign Passports (Official Gazette of the Republic of Indonesia of 2019 Number 954);
30. Article 2 to Article 7 and Article 23 of the Minister of Finance Regulation Number 231/PMK.03/2019 concerning Procedures for the Registration and Deregistration of Taxpayer Identification Numbers, VAT Registration and Deregistration as Well as the Withholding and/or Collection, Remittance and Filing of Taxes for Government Agencies (Official Gazette of the Republic of Indonesia of 2019 Number 1746) as amended by the Minister of Finance Regulation Number 59/PMK.03/2022 concerning the Amendment to the Minister of Finance Regulation Number 231/PMK.03/2019 concerning Amendment to Minister (Official Gazette of the Republic of Indonesia of 2022 Number 359);
31. Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business

Sectors and/or Certain Regions (Official Gazette of the Republic of Indonesia of 2020 Number 114) as amended by PMK-96/PMK.010/2020 concerning the Amendment to the Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions (Official Gazette of the Republic of Indonesia of 2020 Number 839);

32. Minister of Finance Regulation Number 16/PMK.010/2020 concerning the Granting of Net Income Reduction Facility for New Investments or Business Spin-Offs in Certain Business Sectors Constituting Labour-Intensive Industries (Official Gazette of the Republic of Indonesia of 2020 Number 227);
33. Minister of Finance Regulation Number 153/PMK.010/2020 concerning the Granting of Gross Income Reduction for Certain Research and Development Activities in Indonesia (Official Gazette of the Republic of Indonesia of 2020 Number 1173);
34. Minister of Finance Regulation Number 8/PMK.03/2021 concerning Procedures for the Collection, Remittance and Filing of Value Added Tax or Value Added Tax and Sales Tax on Luxury Goods by State-Owned Enterprises and Certain Companies Directly Held by State-Owned Enterprises as Value Added Tax Collection Agents (Official Gazette of the Republic of Indonesia of 2021 Number 75);
35. Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions (Official Gazette of the Republic of Indonesia of 2020 Number 114) as amended by PMK-96/PMK.010/2020 concerning the Amendment to the Minister of Finance Regulation Number 11/PMK.010/2020 concerning the Implementation of Government Regulation Number 78 of 2019 concerning Income Tax Facilities for Investments in Certain Business Sectors and/or Certain Regions (Official Gazette of the Republic of Indonesia of 2020 Number 839);
36. Minister of Finance Regulation Number 48/PMK.03/2021 concerning Procedures for the Registration, Filing and Data Collection on Land and Building Tax Objects (Official Gazette of the Republic of Indonesia of 2021 Number 519);
37. Minister of Finance Regulation Number 54/PMK.03/2021 concerning Procedures for Recording and Certain Criteria as Well as Procedures for Bookkeeping for Tax Purposes (Official Gazette of the Republic of Indonesia of 2021 Number 591);
38. Minister of Finance Regulation Number 63/PMK.03/2021 concerning Procedures for the Electronic Exercise of Tax Rights and Fulfilment of Tax Obligations as Well as the Issuance, Signing and Delivery of Tax Decisions or Assessments (Official Gazette of the Republic of Indonesia of 2021 Number 659);
39. Minister of Finance Regulation Number 60/PMK.03/2022 concerning Procedures for the Appointment of Collecting Agents, Collection,

Remittance and Filing of Value Added Tax on the Utilisation of Intangible Taxable Goods and/or Taxable Services from Outside the Customs Territory Within the Customs Territory Through Electronic Commerce (Official Gazette of the Republic of Indonesia of 2022 Number 360);

40. Minister of Finance Regulation Number 61/PMK.03/2022 concerning Value Added Tax on Self-Building Activities (Official Gazette of the Republic of Indonesia of 2022 Number 361);
41. Minister of Finance Regulation Number 67/PMK.03/2022 concerning Value Added Tax on Supplies of Insurance Agent Services, Insurance Brokerage Services and Reinsurance Brokerage Services (Official Gazette of the Republic of Indonesia of 2022 Number 367); and
42. Minister of Finance Regulation Number 68/PMK.03/2022 concerning Value Added Tax and Income Tax on Crypto Asset Trading Transactions (Official Gazette of the Republic of Indonesia of 2022 Number 368),

are repealed and declared invalid.

Article 484

This Ministerial Regulation shall come into force on 1 January 2025.

For public cognisance, this Ministerial Regulation shall be promulgated by placement in the Official Gazette of the Republic of Indonesia.

Enacted in Jakarta
on 14 October 2024
MINISTER OF FINANCE OF THE REPUBLIC OF INDONESIA,
signed
SRI MULYANI INDRAWATI

Promulgated in Jakarta
on 18 October 2024
DIRECTOR GENERAL OF LEGISLATION ACTING OFFICIAL
MINISTRY OF LAW AND HUMAN RIGHTS OF THE REPUBLIC OF INDONESIA
signed
ASEP N. MULYANA

OFFICIAL GAZETTE OF THE REPUBLIC OF INDONESIA OF 2024 NUMBER 771

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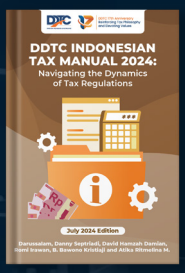

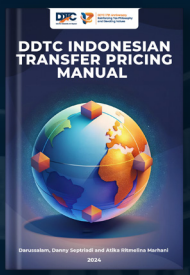

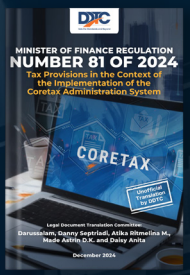

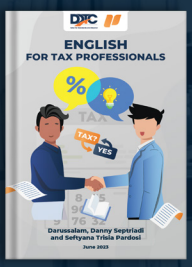

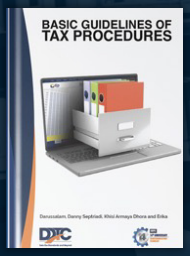

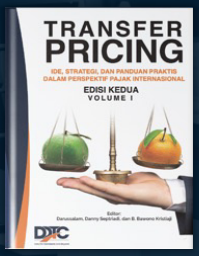

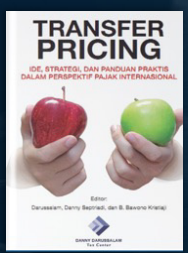

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OUR ACHIEVEMENTS

MINISTER OF FINANCE REGULATION NUMBER 81 OF 2024

Tax Provisions in the Context of the Implementation of the Coretax Administration System

The government has released Minister of Finance Regulation (MoF Reg.) Number 81 of 2024 which encompasses provisions on the implementation of the Coretax Administration System (CTAS). The issuance of MoF Reg. 81/2024 constitutes the main pillar in the exercise of tax rights and the fulfilment of tax obligations in the foreseeable future.

On account of the major agenda MoF Reg. 81/2024 embodies for all parties involved in the world of taxation, DDTC presents a translation of this regulation in English. The translation of MoF Reg. 81/2024 is presented to expand the range of information on changes in tax administration under this regulation.

On the one hand, in light of the fact that taxes are crucial, the translation of MoF Reg. 81/2024 may be used as a resource for the Indonesian society for decisionmaking related to global stakeholders. On the other hand, for foreign nationals, in particular, investors, this translation may be used to study the current tax administration system in Indonesia.

This is in line with one of DDTC's missions, i.e., to eliminate asymmetric tax information in the Indonesian tax community. DDTC strives to provide the translation of MoF Reg. 81/2024 with the translation by a team of professional and credible translators. MoF Reg. 81/2024 is expected bridge the needs of the tax community with the latest, reliable and trustworthy information on tax regulations.

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