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# Indonesia Adopts CbCR & New TP Doc Requirements





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Equality, Certainty, Convenience, Economy



Center of Tax Knowledge



Ensuring a Balanced Tax System



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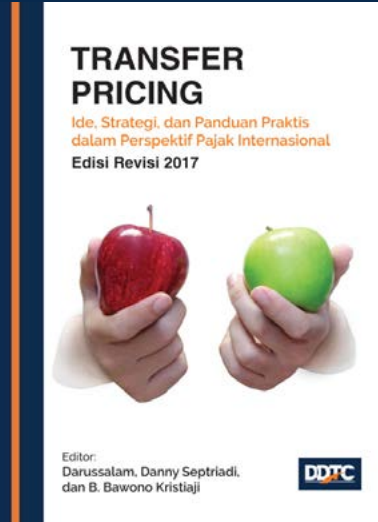
Indonesian Tax Firm, Worldwide Knowledge



One Stop Indonesian Tax Documents

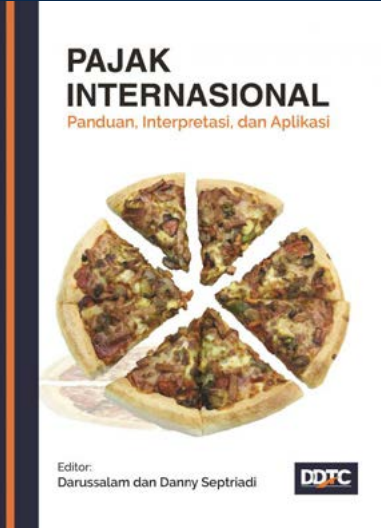
DDTC is a research and knowledge based taxation institution and a centre of a number of taxation activities units with high standards that serve as main references in the field of taxation, consultation services (DDTC Consulting), a center for review and research (DDTC Fiscal Research), taxation journals (DDTC Working Paper), a training centre (DDTC Academy), a provider of tax law documents (DDTC Tax Engine), a library (DDTC Library), and taxation news portal (DDTC News).

Those various activities are in essence the realization of our commitment to provide high quality and comprehensive services, to reduce asymmetric information, to be consistent in innovating and to contribute positively in the improvement of Indonesia's tax system.



### Transfer Pricing: Ide, Strategi, dan Panduan Praktis dalam Perspektif Pajak Internasional

### 2017 Revised Edition



### Pajak Internasional: Panduan, Interpretasi, dan Aplikasi

# We provide high quality and comprehensive tax services that exceed our clients` expectation.



Transfer Pricing



General Tax Services



Tax Advisory, Structuring & Facility Support



Tax Compliance Assurance



Tax Dispute Support



Tax Litigation Services



HNWI & Expatriate Taxes



Customs Dispute & Litigation



Tax Operations-Risks Assessment & Management



Employment Taxation Services

# We are local tax institution with global knowledge.

## International



2 PhDs from Claremont Graduate University (USA) and the University of New South Wales (Australia)



7 Master Degrees in International Taxation from leading universities abroad.

**One of the most in Indonesia**



1 Bachelor's Degree (LL.B) in Taxation Law (Fiscal Recht) from Leiden University (Netherlands)



2 Advanced Diplomas in International Taxation (ADIT) of the Chartered Institute of Taxation (UK).

**One of the most in Indonesia**



1 Diploma in International Taxation of International Tax Center, Leiden University (Netherlands)



8 Certificates Holder of International Tax Certificate from the Chartered Institute of Taxation (UK).

**One of the most in Indonesia**



8 Certificates Holder of Transfer Pricing from the Chartered Institute of Taxation (UK).

**One of the most in Indonesia**

## Domestic



9 Master Degrees in Accounting, Taxation, Law, Business, and Economics from leading universities in Indonesia

Teaching experience at universities, corporations, government agencies, and others

# We provide full scholarship to our professional staff.

**USA:**  
Thomas Jefferson School of Law • Bloomberg BNA and CITE •

**Belgium:**  
Katholieke Universiteit Leuven

**England:**  
Chartered Institute of Taxation

**Portugal:**  
Universidade Catolica Portuguesa • IDEFF •

**USA:**  
AYSPS, Georgia State University • Duke University •

**Netherlands:**  
• Tilburg University  
• University of Amsterdam  
• Maastricht University  
• International Tax Center (ITC)  
• Leiden University  
• IBFD

**Austria:**  
Vienna University of Economics and Business Administration

**Hong Kong:**  
IBC Legal Conference

**India:**  
Foundation for International Taxation

**Singapore:**  
• Tax Academy of Singapore  
• IBFD

**Malaysia:**  
Leiden University's Tax Center & the Malaysian Tax Academy

# Our professional staff have domestic and international reputation.

**2014 Clients Gala**  
January 2014  
Jaya Hotel

**EXPERTGUIDES**  
THE WORLD'S FINEST APPROPRIATE CHOICE BY THEIR PEERS  
20 years' experience

**TRANSFER PRICING**

**INVESTOR DAILY**  
Tax Amnesty, Babak Baru Perpajakan Indonesia

**Urgensi Pengampunan Pajak**

**GLOBAL TAXATION**  
A MONTHLY JOURNAL ON INTERNATIONAL TAXATION, TRANSFER PRICING & ESTATE

**The Forum on Economic and Fiscal Policy**  
Your guide, Indonesian Global Trust Fund

**Tax Treatment of Derivatives**

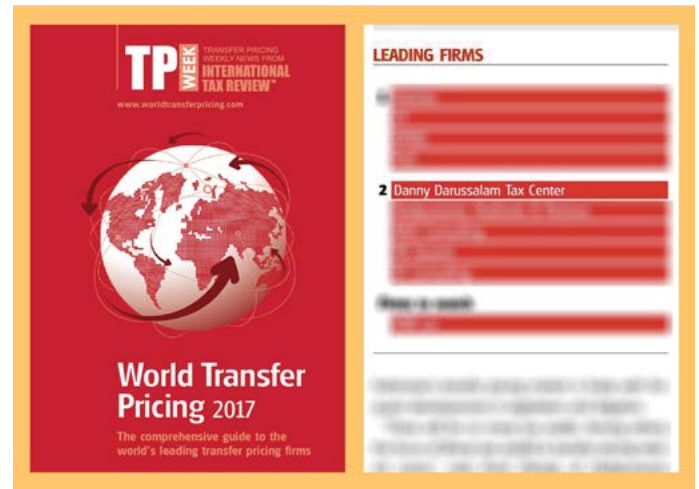
**Mr. Yusuf Wangko Ngantung**  
has won the WTS Tax Award  
**FIRST PLACE**  
for his masters thesis in the academic year 2013/2014  
Vienna, October 2014

**CFE**  
The Albert Rädler Medal  
Awarded to  
B. Bawono Kristiaji

**Towards A New Standard for Transfer Pricing Documentation: A Brief Comment\***

**ITC**

# We were given an award by International Tax Review's World Tax and World Transfer Pricing 2017.



# We actively shares knowledge through journals, magazines and books.



We have one of the most complete taxation libraries in Indonesia.



“You are what you read, aren't you?”

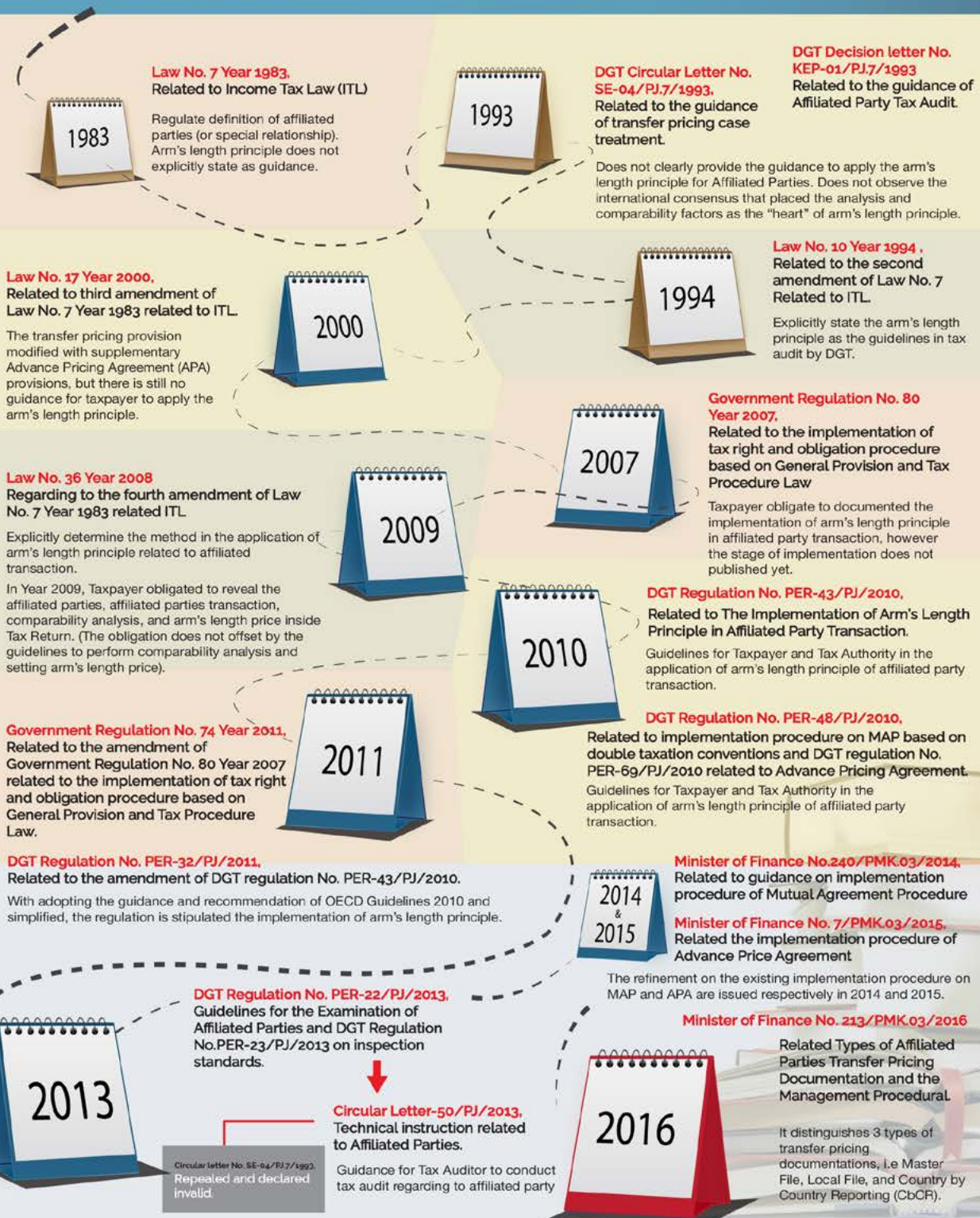
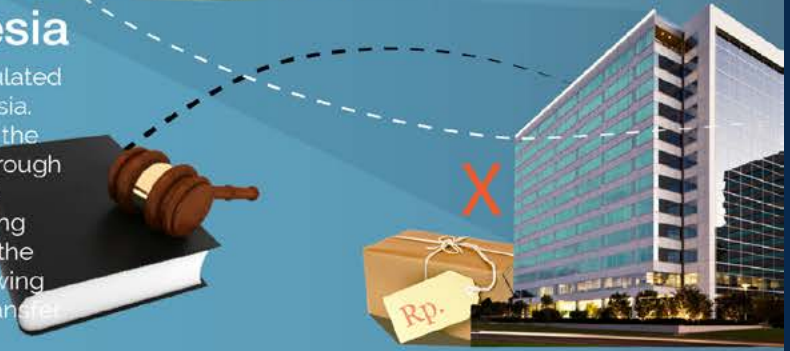
### Some of our valued clients.



# The amendment of Transfer Pricing Regulation in Indonesia

## Regulation in Indonesia

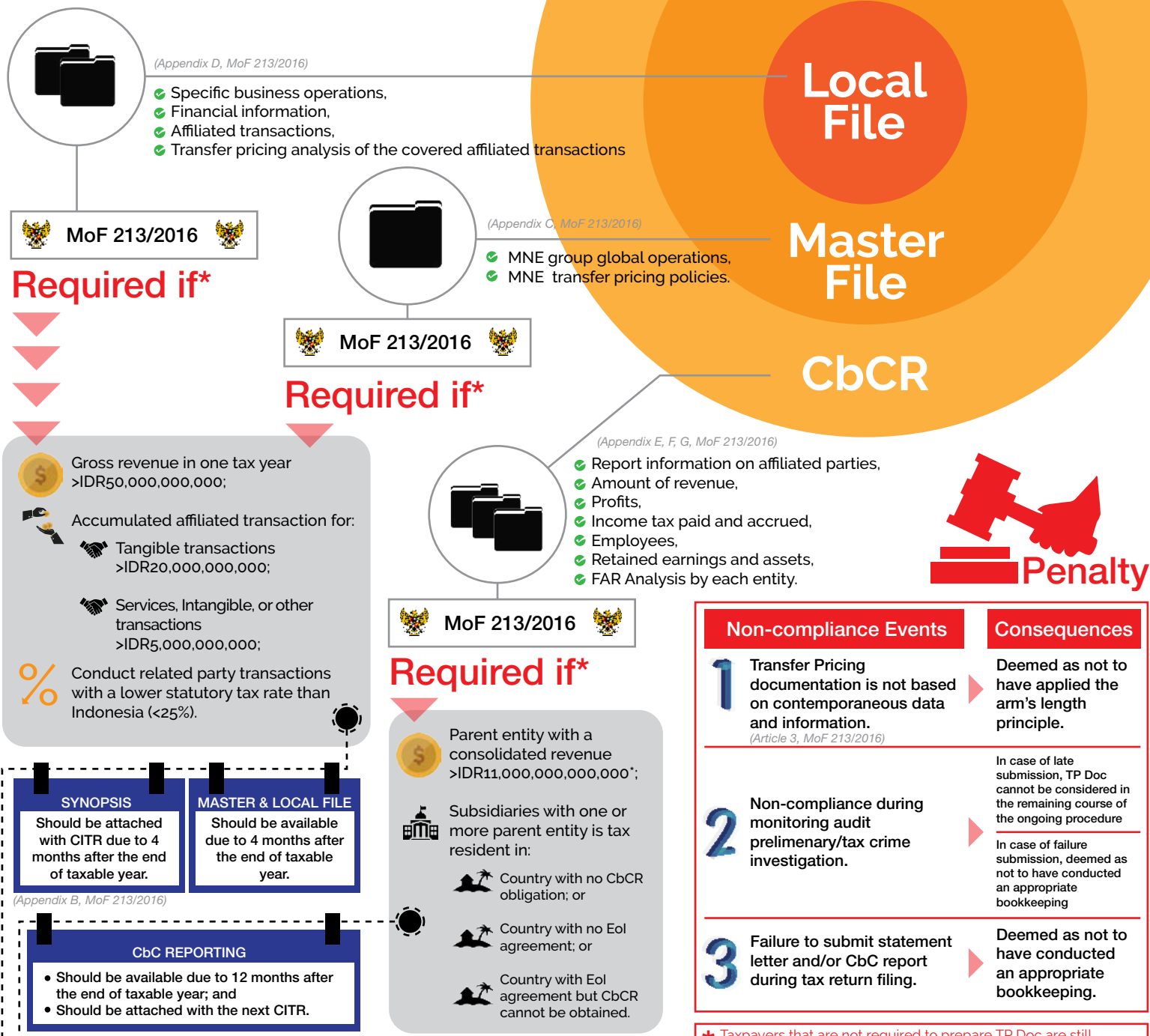
Indonesia is the first country that stipulated transfer pricing regulation in Southeast Asia. Although the Income Tax Law has stated the provision regarding to transfer pricing (through Law Number 7 Year 1983), the guidelines related to the application of transfer pricing published more than two decades since the publication of Income Tax Law. The following important notes related to historical of transfer pricing provisions in Indonesia.





# Indonesia Adopts CbC Reporting & New TP Doc Requirements

Since the release of BEPS action 13, regarding to guidance on transfer pricing documentation and country-by-country reporting (CbCR), G20/OECD member countries has been agreed to implement the minimum standard consistently. As part of Indonesia's commitment to the implementation of the standard, the Ministry of Finance released on 30 December 2016, decree no. PMK-213.03/2016 (MoF 213/2016), the much-anticipated regulation on CbCR and its corresponding updates to transfer pricing documentation requirements. The standard called **Three-tiered Approach**.



Example: Bookkeeping Jan-Dec 2016.

Example: Bookkeeping Jan-Dec 2016.

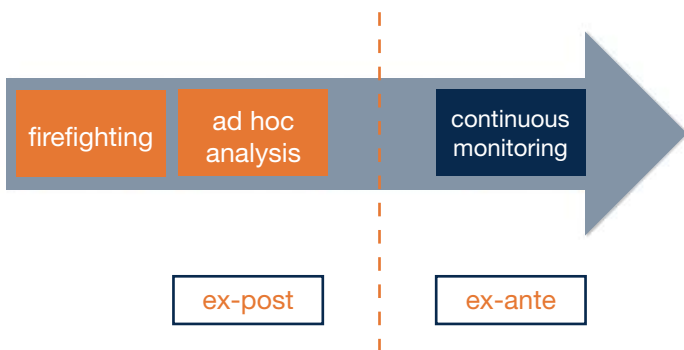
# Operational Transfer Pricing

## Background

Based on transfer pricing regulations, intercompany margins must be at arm's length. This is often evidenced by benchmarking data, which are available years later, if not during the time of audits, when these margins will be tested. Not surprisingly discrepancies could be discovered because these benchmark data were not available for the multinational when the transactions were executed. The principal factor is time, or in other words, what information is available at what time. Therefore, the issue is how can your company act or react to ensure an arm's length behavior in your intercompany transactions.

## Why is operational transfer pricing important?

The risk of "out of control" intercompany profit margins and the likelihood of material year-end adjustments can be effectively countered by continuous monitoring of intercompany margins, through effective operational transfer pricing management.



Firefighting & adhoc analysis	Continuous monitoring
<ul style="list-style-type: none"> <li>Outcome testing tool</li> <li>Results in Year-end adjustments/ ex-post adjustments/ one-off compensation, to bring intercompany profits in line with Arms length profits</li> </ul>	<ul style="list-style-type: none"> <li>Proactive intercompany margin management/ price setting approach/ operational transfer pricing/ Year-to-go adjustments</li> </ul>

Firefighting & adhoc analysis	Continuous monitoring
<ul style="list-style-type: none"> <li>No uniform application internationally (there is no guidance and often no regulations as well)</li> <li>Risks:</li> <li>Double taxation/ in corresponding country not tax deductible</li> <li>Accounting treatment</li> <li>VAT/Customs</li> <li>Credit/debit entry (operational issue): what must be described in the document?</li> <li>Secondary adjustments/ withholding tax issues</li> </ul>	<ul style="list-style-type: none"> <li>Avoids Year-end adjustments</li> <li>Margin monitoring throughout the year</li> <li>Opportunity for a corrective action by updating prices during current year in order to steer margin proactively</li> <li>Fewer controversies and reduced risks</li> </ul>



## How can we help you?

We can assist you in shifting your traditional approach to transfer pricing into an effective transfer pricing management approach.

Operational outcome testing	<ul style="list-style-type: none"> <li>Review at the end of the fiscal year, whether deviation from target margin is acceptable or not</li> <li>Advice whether to conduct year-end adjustment</li> </ul>	Hypothetical price setting	<ul style="list-style-type: none"> <li>Prepare target margin at the beginning of new fiscal year</li> <li>Integrate target margin to business plan and budget preparation</li> </ul>
Empirical outcome testing	<ul style="list-style-type: none"> <li>Revise hypothetical target margin with available data at the end of the fiscal year</li> </ul>	Operational price setting	<ul style="list-style-type: none"> <li>Inform target margin to stakeholders (controllers and sales managers)</li> <li>Systematically integrate target margin to retail price, volume forecast and preparation of cost budgets</li> </ul>
Contemporaneous transfer pricing documentation	<ul style="list-style-type: none"> <li>Document every step of the transfer pricing management process in accordance with MoF 213/2016</li> </ul>	Operational monitoring and price updating	<ul style="list-style-type: none"> <li>Conduct quarterly reviews, deviation analysis from the forecast</li> <li>Detect early on whether deviation is likely</li> <li>Conduct corrective action by updating price during current year to steer intercompany margins</li> </ul>



hypothetical price setting

operational price setting

operational monitoring & price updating

# Our Transfer Pricing Specialists

DDTC's specialists have in-depth transfer pricing knowledge obtained from well-known universities abroad and transfer pricing skills international certificates.



## DARUSSALAM

DARUSSALAM is Managing Partner of DDTC. His main academic focuses are international taxation and comparative tax law. He is acknowledged as a tax expert witness in various tax cases at the District Court, the Corruption Court, the Tax Court and the Constitutional Court. In addition, he has recently been chosen as the government's expert witness in Tax Amnesty Law judicial review.

He received a Master's degree in Tax Policy and Administration from the University of Indonesia, and a second Master's degree (LLM) in European and International Tax Law from European Tax College (at Tilburg University in the Netherlands and Katholieke Universiteit Leuven in Belgium). His master thesis is entitled "Critical Analysis on Indonesian Transfer Pricing Rules: a Proposal for Indonesian Transfer Pricing Guidelines".

In 2009, he successfully completed an advanced transfer pricing course from Thomas Jefferson School of Law, San Diego, California, USA. In 2011, he attended the "Asia Pacific Transfer Pricing Summit 2011" held by IBC Legal Conference in Hong Kong and also a seminar on "European Tax Law" held by Tax Academy of Singapore and the Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration, in Singapore. In 2012, he attended "Summer School of Value Added Tax Programme" held by Universidade Católica Portuguesa, in Lisbon, Portugal. In 2015, he attended "International Tax Conference: BEPS & Beyond" held by Foundation For International Taxation, in Mumbai, India.

Darussalam is the author of several books (6 books) and numerous articles on taxation (127 articles). He is a source for print media (Kompas, Kontan, Bisnis Indonesia, Tempo Magazine and Newspaper, Sinar Harapan, Suara Pembaruan, Jawa Pos, Rakyat Merdeka) and electronic media (TV One, Metro TV, RCTI, SCTV, TVRI, Berita Satu, Jak TV, Kompas TV, ANTV, Sindo TV, Detik.com, BBC Indonesia), and also a speaker at several institutions (Directorate General of Taxes, Fiscal Policy Agency, Corruption Eradication Commission, Secretariat of Tax Court, National Economic Committee, Bank Indonesia, PUSDIKLAT Pajak, Ministry of Research

and Technology, Chamber of Commerce and Industry, Indonesian Fiscal and Tax Administration Association, Indonesian Tax Consultants Association, Indonesian Institute of Accountants) and some universities (the University of Indonesia, Brawijaya University, Airlangga University, Gadjah Mada University, Parahyangan Catholic University, Tarumanagara University, Trisakti University, Petra Christian University, Bina Nusantara University, Christian University of Indonesia, Sebelas Maret University).



## DANNY SEPTRIADI

DANNY SEPTRIADI is the Senior Partner of DDTC and a lecturer at Graduate Program in Tax Policy and Administration Science and at Master in Accounting Program at the University Of Indonesia. He was selected as one of the World's Leading Transfer Pricing Advisers 2015 by Expert Guides. He was experienced in Arbitration Disputes as an expert in London, United Kingdom and he is an expert witness of PT Kraft Indonesia, PT General Food Industries in the Indonesian tax court. His main research areas are international taxation and transfer pricing. He also serves as a Secretary at Indonesian International Tax Society (IITS). He has advised clients in various areas of corporate taxation, tax risk management and transfer pricing.

He received a Master's degree in Tax Policy and Administration from the University of Indonesia, and a second Master's degree (LLM) in International Taxation from Vienna University of Economics and Business Administration, Austria, with master thesis on tax treaty policy. In 2012, he attended "Summer School of Transfer Pricing Programme" held by Universidade Católica Portuguesa, in Lisbon, Portugal. In 2014, he attended "Advanced Course in Transfer Pricing" held by Maastricht Centre for Taxation, Maastricht University, in The Netherlands. Then, in 2015, he attended "Transfer Pricing: Policy and Practice" held by Duke Center International Development (DCID), Duke University North Carolina, USA.

Danny Septriadi has published several books and numerous articles on transfer pricing and international

taxation. He is a source for print media (Kompas, Bisnis Indonesia, and Kontan), and also a speaker at several institutions (Directorate General of Taxes, Fiscal Policy Agency, Secretariat of Tax Supervisory Committee, Secretariat of Tax Court, PUSDIKLAT Pajak, Indonesian Institute of Accountants, University of Indonesia, Bina Nusantara University).



### ROMI IRAWAN

ROMI IRAWAN is the Partner of Transfer Pricing Services at DDTC. He is an experienced practitioner in transfer pricing controversies. He has vast experience in handling transfer pricing issues for clients involved in crude palm oil, automotive, pulp, and chemical industries.

He received his Bachelor's degree in Financial Management from the University of Indonesia, Master's degree in Corporate Financial Management from Gadjah Mada University and he received his next Master's Degree in International Taxation (LL.M. Int. Tax) at Vienna University of Economics and Business Administration – Austria, under full scholarship from DDTC.

In 2010, he participated in distance learning courses on “transfer pricing”, held by the International Management Forum in association with Transfer Pricing Associate, the Netherlands. In 2011, he attended many transfer pricing workshops, seminars and courses, on “Advanced Transfer Pricing Workshop” held by IBFD in Amsterdam, the Netherlands, “Global Development in Transfer Pricing” held by Tax Academy of Singapore, in Singapore, “Transfer Pricing Workshop on Transfer Pricing Documentation and Transfer Pricing Intangibles” held by IBC Legal Conference, in Hong Kong, and “UK Transfer Pricing Policy and Developments” held by Tax Academy of Singapore, in Singapore. In 2012, he attended “the First Annual Conference Series regarding U.S. Transfer Pricing Primer” organized by Bloomberg BNA and CITE, in Salt Lake City, United States of America. In April 2014, he attended “Transfer Pricing Advanced Course Programme” organized by Transfer Pricing Research Center, Leiden University, in Leiden, the Netherlands.

He has passed two out of three examination papers for Advance Diploma in International Taxation from the Chartered Institute of Taxation – UK, including Principles of International Taxation and Principles of Corporate and International Taxation (Transfer Pricing), and therefore has been awarded Certificate in Principles of International Taxation and Principles of Corporate and International Taxation (Transfer Pricing).

He is a regular speaker in various seminars and trainings organized by DDTC, covering topics in Transfer Pricing. He is frequently involved as a trainer and speaker in several forum and group discussions held by private institutions and government agencies including Tax Office (KPP) Madya Sidoarjo, Fiscal Policy Office of Ministry of Finance and Secretariat of Tax Court, PUSDIKLAT Pajak, PajakOnline and Formasi, Secretariat of Tax Supervisory Committee, Centre of Investment, Finance and Energy Studies (CIFES), Faculty of Economics of the University of Indonesia, Bina Nusantara University, Tax Center FISIP UI, Sinar Mas Group, Unilever, Kalbe Group, and others.



### DAVID HAMZAH DAMIAN

DAVID HAMZAH DAMIAN is the Partner of Tax Compliance & Litigation Services at DDTC. He is well known for his research and advocacy skills, in particular for analyzing cases and arguing appeals. He regularly handles cases in Tax Court, and has a strong track record in tax appeal proceedings in transfer pricing, value added tax, corporate income tax, and custom cases, both in writing submissions and at hearings. He is also the co-author of the Indonesian chapter in the third edition of a book titled “the Tax Disputes and Litigation Review”, published by Law Business Research.

He received his Bachelor's degree in Fiscal Administration from the University of Indonesia, and currently he is pursuing his Master's degree in Tax Policy and Administration at the University of Indonesia, under scholarship from DDTC.

In 2010, he attended a course on “Transfer Pricing Aspects of Business Restructurings” organized by IBFD, in Singapore. Further, in 2011 he attended the “Annual International Taxation Conference” held by the Foundation for International Taxation, in Mumbai, India, and attended the “Tax Treaties” seminar, held by Tax Academy of Singapore and the Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration, in Singapore. In 2012, he attended the “Asia Pacific Branch – Singapore Conference 2012”, held by the Chartered Institute of Taxation in Singapore, and also a course on “Tax Risk Management” held by IBFD, in Singapore. In 2013, he attended “the Amsterdam Centre for Tax Law Winter Course on International Tax Law”, held by the Amsterdam Centre for Tax Law of the University of Amsterdam, in the Netherlands, and “Summer School of Value Added Tax Programme” held by the Universidade Católica Portuguesa, in Lisbon, Portugal.

He has passed two out of three examination papers for Advance Diploma in International Taxation from the Chartered Institute of Taxation – UK, including Advance International Taxation: Singapore Option; and Principles of International Taxation, and therefore has been awarded a certificate in Principles of International Taxation. He has completed certificate C of Indonesian Tax Consultant Examination and has been licensed to practice as a registered tax consultant. He holds a license to practice as a tax attorney by the Tax Court.

He is frequently involved as a trainer, lecturer or speaker in several tax trainings or seminars, held by DDTC, governmental institutions, private institutions, and universities, including House of Regional Representatives of Republic Indonesia, the South Jakarta Medium Tax Office (KPP), Secretariat of Tax Supervisory Committee, the Bali Chapter of Indonesian Tax Consultant Association, TELKOM Group, Kalbe Group, PAMA Persada Nusantara, the Accountant Professionalism Study of Faculty of Economics of the University of Indonesia, the Fiscal Administration Study Group of the University of Indonesia, Christian University of Indonesia and so forth.



## B. BAWONO KRISTIAJI

B. BAWONO KRISTIAJI is the Partner of Tax Research & Training Services at DDTC. He is an experienced practitioner in public finance, tax policy, and transfer pricing. Prior to joining DDTC, he worked as researcher in Strategic Asia, a consultancy firm specializing in economic development policy.

He received his Bachelor's degree in Economics from the University of Indonesia, received his Master's Degree in Economic Science at the same university with the thesis titled "The Implication of Shadow Economies and Governments' Effectiveness on Realization and Effort to Optimize Tax Revenue". He received his next Master's Degree in International Business Tax and Economics (MSc. IBT) at School of Economics and Management, Tilburg University, the Netherlands under scholarship from DDTC with the thesis titled "Incentives and Disincentives of Profit Shifting in Developing Countries". This thesis was chosen as the best work in the area of European Taxation by Confédération Fiscale Européenne (CFE), and therefore was awarded Albert J. Rädler Medal 2015.

In 2012, he attended a course of the Master of Advanced Studies in International Tax Law on "Transfer Pricing Rules in International Taxation" held by the International Tax Center, Leiden University, in Leiden, the Netherlands. In 2013, he attended Public Policy Summer Training Course 2013 "Tax Policy,

Fiscal Analysis, and Revenue Forecasting", held by Andrew Young School of Policy Studies, Georgia State University, USA.

B. Bawono Kristiaji holds Advanced Diploma in International Taxation; Certificate in Principles of International Taxation; and Certificate of Principles of Corporate and International Taxation (Transfer Pricing) from the Chartered Institute of Taxation, UK.

He is a major contributor for the latest DDTC's transfer pricing book titled "Transfer Pricing: Ide, Strategi, dan Panduan Praktis dalam Perspektif Pajak Internasional", the chief editor for DDTC Working Papers and senior editor for InsideTax Magazine. He is an active member of the Indonesian Fiscal Association (AFI) and Indonesian Fiscal and Tax Administration Association (IFTAA). He is a source for print and electronic media (Jakarta Post, Republika, BeritaSatu, MNC Business, Bisnis Indonesia, and Bloomberg).

He is a regular speaker in various seminars and trainings organized by DDTC, covering topics in Transfer Pricing. He is frequently involved as a trainer and speaker in several forum and group discussion held by private institutions and government agencies including Forum on Economic and Fiscal Policy (The Netherland), 21<sup>st</sup> International Taxation Conference 2016 (FIT, India), House of Representatives of the Republic of Indonesia, House of Regional Representatives of the Republic of Indonesia, Directorate General of Taxes, Fiscal Policy Agency, Secretariat of Tax Court, Secretariat of Tax Supervisory Committee, International Tax and Investment Center, BAPPENAS, Ministry of Research and Technology, PUSDIKLAT Pajak, Institute of Indonesia Chartered Accountants (IAI), Astra International, KALBE Group, University of Indonesia, and others covering topics in tax policy trends.



## UNTORO SEJATI

UNTORO SEJATI is the Senior Manager of Transfer Pricing Services at DDTC. He has been involved in handling transfer pricing controversies, as well as design, review, implementation and documentation of transfer pricing policies with emphasis on accounting analysis.

He received his Bachelor's degree in Accounting from the University of Indonesia and currently pursuing his Master's Degree of Law in International Taxation (LL.M. Int. Tax) class of 2015-2016 at Vienna University of Economics and Business Administration - Austria, under full scholarship from DDTC.

In 2011, he attended a workshop on "Permanent Establishment" held by IBFD, in Singapore. In

2012, he attended a workshop on “Advanced Transfer Pricing Workshop” held by IBFD in Amsterdam, the Netherlands. In April 2015, he attended “Transfer Pricing Advanced Course Programme” organized by Transfer Pricing Research Center, Leiden University, in Leiden, the Netherlands. He holds Certified Public Accountant (CPA).

He is also frequently involved as a trainer or speaker in several tax trainings or seminars, held by DDTC, Unilever, Kalbe Group, PT Astra International Tbk, Indonesian Tax Consulting Association (IKPI), the Institute of Indonesia Chartered Accountant (IAI), Fiscal Policy Agency, Secretariat of Tax Court, Secretariat of Tax Supervisory Committee, and others.



## YUSUF WANGKO NGANTUNG

YUSUF WANGKO NGANTUNG is the Senior Manager of International Tax/Transfer Pricing Services at DDTC. He is an experienced practitioner involved in international tax, dispute resolution, and transfer pricing projects. Prior to joining DDTC, he worked for Horwath de Zeeuw & de Keizer, the Netherlands, where he was involved in international tax planning projects for both inbound and outbound investments, European VAT, and taxation on expatriates.

He received his Bachelor of Law degree (LL.B) in Taxation Law (fiscal recht) from the Leiden University, in Leiden, the Netherlands and his Master Degree in International Taxation (LL.M. Int. Tax) at Vienna University of Economics and Business Administration – Austria, graduated with honors, under full scholarship from DDTC and he was awarded WTS Tax Award, 1st place for master thesis titled “Tax Treaties and Developing Countries” in academic year 2013/2014 at Vienna University of Economics and Business Administration.

In 2010, he attended several overseas tax courses held by IBFD, covering the following topics: “Transfer Pricing Aspects of Business Restructuring” in Singapore, and “Transfer Pricing for Intangibles & Intra-group Financing” in Amsterdam, the Netherlands. Further, in 2011, he attended a course on “Practical Aspects of International Tax Planning” held by IBFD, in Kuala Lumpur, Malaysia.

Yusuf Wangko Ngantung holds Advanced Diploma in International Taxation; Certificate in Principles of International Taxation; and Certificate of Principles of Corporate and International Taxation (Transfer Pricing) from the Chartered Institute of Taxation, UK and he holds a license to practice as a tax attorney by the Tax Court.

He is a lecturer on International Taxation at Master in Accounting Program at the University of Indonesia and

a regular speaker in various seminars and trainings organized by DDTC, covering topics in international tax and transfer pricing. He is regularly invited as a speaker in tax conferences organized by government institutions and universities, including the Directorate General of Taxes, Fiscal Policy Agency, Secretariat of Tax Court, Indonesian Tax Consultants Association, the University of Indonesia, the Petra Christian University (Surabaya), PT Wijaya Karya (Persero) Tbk, PT Mayekawa Indonesia, PT Growth Asia and others.a



## GANDA CHRISTIAN TOBING

GANDA CHRISTIAN TOBING is the Senior Manager of International Tax/Tax Compliance and Litigation Services at DDTC. He is an experienced practitioner involved in tax dispute resolution projects, where he has represented various multinational companies. He advises a wide range of domestic and international clients across industry sectors and provides tax advice for private client.

He received his Bachelor’s degree in Fiscal Administration from the University of Indonesia and his Master Degree in International Taxation (LL.M. Int. Tax) at Vienna University of Economics and Business Administration – Austria, under full scholarship from DDTC. In 2011, he attended a course on “Practical Aspects of International Tax Planning” held by IBFD, in Kuala Lumpur, Malaysia.

He has passed Principles of International Taxation examination paper for Advance Diploma in International Taxation from the Chartered Institute of Taxation – UK, and therefore has been awarded Certificate in Principles of International Taxation. He holds a license to practice as a tax attorney by the Tax Court.

He is also frequently involved as a trainer or a speaker in various seminars and training in topics regarding international taxation, transfer pricing, tax policy, and Indonesian domestic tax held by DDTC, Directorate General of Taxes, Fiscal Policy Agency, Indonesian Tax Consulting Association (IKPI), PAMA Persada Nusantara, PT Bio Farma (Persero), PT Archi Indonesia, PT Sarana Multi Infrastruktur (Persero), PT Wijaya Karya (Persero) Tbk, PT Charoen Pokphand Indonesia Tbk, Christian University of Indonesia, and others.



**DEBORAH**

DEBORAH is the Senior Manager of Tax Compliance and Litigation Services at DDTC. She has been involved in transfer pricing study assignments, also significant tax dispute resolution and litigation cases. From her assignments, she has provided clients with satisfactory outcomes. Her main expertise in tax litigation cases includes transfer pricing and business restructuring cases.

She received her Bachelor's degree in Fiscal Administration with cum laude from the University of Indonesia, and her Master's degree in International Taxation (LL.M. Int. Tax) at Vienna University of Economics and Business Administration – Austria, under full scholarship from DDTC.

In 2011, she attended a course on “Basic International Taxation” held by IBFD, in Kuala Lumpur, Malaysia, and a course on “Transfer Pricing Program (Class of 2011)” organized respectively by Inland Revenue Authority of Singapore, Tax Academy of Singapore, Atax, and the University of New South Wales, Australia, in Singapore.

In 2012, she attended seminars and courses held by Vienna University of Economics and Business Administration, Austria:

- The Relevance of Art. 7 OECD MC for the definition of PE; and
- Prospects for US Tax Reform.

In 2012, she attended seminars and courses held by Vienna University of Economics and Business Administration and PwC, Austria:

- Mandatory and Binding Arbitration in Bilateral and Multilateral Tax Conventions;
- The New Politics of Tax Administration;
- Capital Gain Taxes on Shares and the Participation Exemption in Europe; and
- The Impact of the White Paper for Adequate, Safe and Sustainable Pensions on Treaty Police in Europe.

In 2013, she attended seminars and courses held by Vienna University of Economics and Business Administration, Austria:

- Tax Treaty Case Law Around the Globe;
- The Chinese Perspective of Global and Domestic Tax Policy Issues; and
- GAARs (General Anti-Avoidance Rules) in the Chinese Tax System.

In 2013, she also attended seminars and courses held by Vienna University of Economics and Business Administration and PwC, Austria:

- Treatment of Intangibles for Transfer Pricing Purposes in the Light of the OECD Update on

- Chapter VI of the Transfer Pricing Guidelines; and
- Latest Developments at OECD on Indirect Taxes & the International VAT/GST Guidelines.

She has completed certificate C of Indonesian Tax Consultant Examination and has been licensed to practice as a registered tax consultant. She holds a license to practice as tax attorney by the Tax Court.

She is a lecturer on International Taxation at Master in Accounting Program at the University of Indonesia. She is also frequently involved as a trainer or speaker in several tax trainings or seminars, held by DDTC, University of Indonesia, Christian University of Indonesia, Central Bank of Indonesia, Kantor Berita Antara, PT Toyota Astra Motor, PT Total Oil Indonesia, PT Kalbe Farma Tbk, PT Akashi Wahana Indonesia, PT Bahana TCW Investment Management, and others.



**ANGGI TAMBUNAN**

ANGGI PADOAN IBRAHIM TAMBUNAN is the Manager of Tax Compliance and Litigation Services at DDTC. He is an experienced practitioner with particular expertise in handling tax reviews, and tax dispute resolution procedures. He has represented various multinational companies involved in mining, forwarding and supply chain, transportation, automotive, aircraft, hospitality, chemical, hotels, heavy equipment and information technology industry. He is also a regular speaker in topics regarding international taxation and Indonesian domestic tax in various seminars and trainings held by DDTC, private institutions, and educational institutions.

He received his Bachelor's degree in Fiscal Administration from the University of Indonesia, and Master's degree in Economic Law at the Faculty of Law of the University of Indonesia, under scholarship from DDTC.

He has passed two out of three examination papers for Advance Diploma in International Taxation from the Chartered Institute of Taxation – UK, including Advance International Taxation: Singapore Option; and Principles of International Taxation, and therefore has been awarded Certificate in Principles of International Taxation. Furthermore, he has completed certificate C of Indonesian Tax Consultant Examination and has been licensed to practice as a registered tax consultant. He holds a license to practice as a tax attorney by the Tax Court.

In 2011, he attended a course on “Principles of International Taxation”, held by IBFD, in Kuala Lumpur, Malaysia. In 2012, he attended a course on “Practical



Aspects of International Tax Planning”, held by IBFD, in Kuala Lumpur, Malaysia. Further in 2013, he also attended a course on “International Taxation of Oil and Gas and Other Mining Activities”, held by IBFD, in Singapore. In 2015, he joined the “Summer Course of International Taxation and Transfer Pricing”, held by the International Tax Center (ITC), Leiden University, the Netherlands.



## VERONICA KUSUMAWARDANI

VERONICA KUSUMAWARDANI is the Assistant Manager of Transfer Pricing Services at DDTC. She is an experienced practitioner with particular expertise in transfer pricing for clients involved in palm oil, automotive, heavy equipment, and mining industries.

She received her Bachelor’s degree in Fiscal Administration from the University of Indonesia, and her Master’s degree in Accounting at the same university, under scholarship from DDTC.

In 2011, she attended a course on “Principles of Transfer Pricing” held by IBFD, in Kuala Lumpur, Malaysia. In 2012, she attended a course on “Taxation of Supply Chain Management” held by IBFD in Kuala Lumpur, Malaysia. In 2013, she attended “Summer School of Transfer Pricing Program” held by the Universidade Católica Portuguesa, in Lisbon, Portugal. She passed the exam of Ujian Sertifikasi Konsultan Pajak (USKP) B, organized by Indonesian Tax Consulting Association (IKPI), and has been licensed to practice as a registered tax consultant. She holds a license to practice as a tax attorney by the Tax Court.

She is also frequently involved as a trainer or speaker in several tax trainings or seminars, held by DDTC, governmental institutions, private institutions, and universities, including PUSDIKLAT Pajak, PT Astra International Tbk, Christian University of Indonesia, and others.



## CINDY KIKHONIA FEBBY

CINDY KIKHONIA FEBBY is the Assistant Manager of Transfer Pricing Services at DDTC. She is an experienced practitioner with particular expertise in transfer pricing for clients in the cosmetic, food, and electronic industries.

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She has passed Principles of Corporate and International Taxation (Transfer Pricing) examination paper for Advance Diploma from the Chartered Institute of Taxation – UK, and therefore has been awarded Certificate in Principles of Corporate and International Taxation (Transfer Pricing). She passed the exam of Ujian Sertifikasi Konsultan Pajak (USKP) A, organized by Indonesian Tax Consulting Association (IKPI) and has been licensed to practice as a registered tax consultant. She holds license to practice as a tax attorney by the Tax Court.

She is also frequently involved as a trainer or speaker in several tax trainings or seminars, held by DDTC, governmental institutions, private institutions, and universities, including Fiscal Policy Agency, Indonesian Tax Consulting Association (IKPI), the Institute of Indonesia Chartered Accountant (IAI), PT Astra International Tbk, TELKOM Group, PT Mayekawa Indonesia, the University of Indonesia and others.



## PRETTY WULANDARI

PRETTY WULANDARI is the Senior Specialist of Transfer Pricing Services at DDTC. She has been involved in transfer pricing services in various industries, such as automotive industry, heavy equipment industry, oil and gas industry, mining industry, pulp and paper industry, stationery industry, biotechnology industry, and cosmetics industry.

She received her Bachelor's degree in Fiscal Administration from the University of Indonesia.

In 2013, she attended a regular course on "Transfer Pricing" and "International Taxation" held by DDTC, and she passed the exam and holds the certificate of excellence. In 2015, she attended "Global Transfer Pricing Course", held by Vienna University of Economics and Business Administration, Austria. In 2014, she has completed certificate A of Indonesian Tax Consultant Examination, organized by Indonesian Tax Consulting Association (IKPI).

She has passed Principles of Corporate and International Taxation (Transfer Pricing) examination paper for Advance Diploma from the Chartered Institute of Taxation – UK, and therefore has been awarded Certificate in Principles of Corporate and International Taxation (Transfer Pricing).

She is also involved as a trainer or speaker in transfer pricing training or seminar, held by DDTC, Indonesian Tax Consulting Association (IKPI) and University of Indonesia.



## DENIA ENDRIANI

DENIA ENDRIANI is the Senior Specialist of Transfer Pricing Services at DDTC. She has been involved in transfer pricing study assignments for clients in various industries, such as palm oil, automotive, heavy equipment, plastics, pulp and paper, chemicals, public address system, spices and

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In 2013, she attended a regular course on "Transfer Pricing" and "International Taxation" held by DDTC, and she passed the exam and holds the certificate of excellence. In 2015, she attended "Global Transfer Pricing Course", held by Vienna University of Economics and Business Administration, Austria.

She has passed Principles of Corporate and International Taxation (Transfer Pricing) examination paper for Advance Diploma from the Chartered Institute of Taxation – UK, and therefore has been awarded Certificate in Principles of Corporate and International Taxation (Transfer Pricing).

She is also involved as a trainer or speaker in transfer pricing training or seminar, held by DDTC and University of Indonesia.



## FLOURESYA LOUSHA

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She received her Bachelor Degree in Economics from Tarumanagara University.

In 2013, she attended a regular course on "Transfer Pricing" held by DDTC, and she passed the exam and holds the certificate of excellence.

She has passed Principles of Corporate and International Taxation (Transfer Pricing) examination paper for Advance Diploma from the Chartered Institute of Taxation – UK, and therefore has been awarded Certificate in Principles of Corporate and International Taxation (Transfer Pricing).

She is also involved as a trainer in transfer pricing training held by DDTC.



## ADZKA FIKRI FADHILAH

ADZKA FIKRI FADHILAH is the Senior Specialist of Transfer Pricing Services at DDTC. He has been involved in transfer pricing services in various industries, including apparel, automotive, power transformer, electronic device, heavy equipment, chemical, commodity, food and feed additives. He has also been involved in transfer pricing audit and litigation.

He received his Bachelor's degree in Fiscal Administration from the University of Indonesia.

In 2014, he attended a regular course on "Transfer Pricing" held by DDTC, and he passed the exam and holds the certificate of excellence. On October 10 – 14, 2016 he attended a course "Advanced Transfer Pricing Course (Specific Topics)" held by The Institute for Austrian and International Tax Law of WU (Vienna University of Economics and Business), in Vienna, Austria.

He is also involved as a trainer or speaker in transfer pricing seminar, held by DDTC, PPSDMS Nurul Fikri and Trisakti University.

“The art of transfer pricing management lies in the continuous, but not frantic, price setting and updating.”

- Frank Schoeneborn -





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