



Trusted Professional Tax Training



Training Programs **2017**

Seminar

Intensive Course

Practical Course / Workshop

Training Series Program

In-House Training

Foreword

Tax education is always related to the context of ever-changing dynamics of taxation. Tax landscape is always changing in a very short time. These changes are not only in the domestic realm, but also in the international sphere. In the domestic realm, for example, there is a new tax policy about Tax Amnesty effective from July 2016. Whereas in the international sphere, there is a BEPS Update issue with the implications for the fulfillment of tax obligations. It means that the existence of these changes, require tax practitioners and professionals to always update their knowledge to deal with current tax issues and what is coming up next.

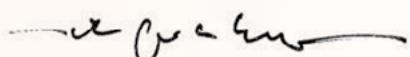
The high demands for tax training and education make DDTCA come to offer you "tax knowledge elevating training" with new concept of training center. Through Intensive Course, Practical Course/ Workshop, Seminars, and Training Series Program, DDTCA provides training programs that draw on relevant concepts and principles, sharp analysis, in-depth research, adapting to a constantly changing environment, strongly upholding academic values, integrity and professionalism as well as reducing asymmetric information in the realm of taxation. Furthermore, we also provide In-house Training in the form of seminars and workshops with structure, time, contents and topics exactly tailored to your organizational needs.

DDTC Academy training programs are designed to provide participants with a deep knowledge in terms of the concept of practical approach to variety of tax issues and latest developments from domestic as well as from international perspective. As a trusted professional tax training, DDTCA has various advantages which may not be offered in other places. Starting from the excellence of our teachers, are experienced professionals who have attended seminars, courses, as well as formal education and hold a world-class international certification. We have the best teaching and learning curriculum, the most complete facilities including theater class, moot court simulation room, and also library access with 2000 books and journals related taxation.

We trust that you are the one who will benefit the most from our "tax knowledge elevating training", which is second to none in Indonesia.

We look forward to you joining our program and wish you success in all trainings you have chosen. Your best training experience here is our priority.

Sincerely yours,
DDTC Academy



Darussalam, SE., Ak., CA., M.Si., LL.M Int. Tax
Head of Program



Table of Contents

Foreword	2
Table of Contents	3
Our Programs	5
Background	7
Our Excellence	8
• Expertise	8
• Investing in Human Capital	9
• International Recognitions	10
Our Competence	12
• Training Evaluation 2016	12
• MoU with Universities	13
• Publications	14
• Facilities	15



Our Programs

Intensive Course	16
1. Transfer Pricing - Executive Class	17
2. Tax Treaty Interpretation & Application - Executive Class	18
Practical Course / Workshop	19
1. Tax Compliance post - Tax Amnesty	20
2. Legal Proceedings in the Tax Court	21
3. Taxation of Business & Investment Activity	22
Seminar	23
1. Domestic & International Corporate Tax Planning	24
2. Updating Foreign Account Tax Compliance (FATCA) & Automatic Exchange of Information (AEOI)	25
3. Advanced Indonesian Value Added Tax (VAT) - Selected Issues	26
4. Recent Development and Emerging Issues of Oil & Gas Taxation	27
5. Connection between Transfer Pricing, Custom Valuation & Voluntary Declaration	28
6. Taxation on Shipping & Aircraft	29
7. International Tax Structuring for Real Estate & Immovable Property Investments	30
8. Taxation on Digital Economy & E-Commerce	31
9. Taxation of Intercompany Financing	32
10. Taxation on Professional Income	33
11. Transfer Pricing post BEPS-OECD/G20	34

Training Series Program	35
A. Tax Compliance & Assurance Series	37
1. Practical Course - Preparation & Calculation of Corporate Income Tax 2016	37
2. Practical Course - Tax Accounting & Fiscal Reconciliation	38
3. Practical Course - Tax Diagnostic Review & Due Diligence	39
	40
B. Tax Policy Training Series	40
1. Seminar - Tax Policy & Administration Course	41
2. Seminar - Fiscal Decentralization & Local Tax Management Course	42
3. Seminar - International Tax Policy Course	43
C. Dispute Resolution Series	43
1. Seminar - Updating Procedure of Tax Audit & Dispute Resolution	43
2. Practical Course - Withholding Tax, VAT, & Corporate Income Tax Dispute Resolution (including Moot Court Simulation)	44
3. Practical Course - International Tax Dispute Resolution (including Moot Court Simulation)	45
D. Transfer Pricing Series	46
1. Practical Course - Transfer Pricing Documentation	46
2. Practical Course - Transfer Pricing Valuation	47
3. Seminar - Transfer Pricing Audit & Dispute Resolution Procedures (MAP & APA)	48
4. Practical Course - Transfer Pricing Audit & Case Law (including Moot Court Simulation)	49
In-house Training (IHT)	51
Calendar	56
Registration Procedures	60
Contact / Information	60
Program Discount	59
Lecturers Profile	61
1. Darussalam	61
2. Danny Septriadi	62
3. David Hamzah Damian	63
4. Romi Irawan	64
5. B. Bawono Kristiaji	65
6. Untoro Sejati	66
7. Yusuf Wangko Ngantung	66
8. Ganda Christian Tobing	67
9. Deborah	68
10. R. Herjuno Wahyu Aji	69
11. Anggi P.I Tambunan	69
12. Cindy Kikhonia Febby	70
13. Veronica Kusumawardani	71
14. Rinan Auvi Metally	71
15. Khisi Armaya Dhora	72
16. Wulan Clara Kartini	72
17. Puput Bayu Wibowo	73
18. Denia Endriani	73
19. Pretty Wulandari	74
20. Flouresa Lousha	74
21. Adzka Fikri Fadhilah	75
22. Fakri Sodikin	75
23. Anisa Nurpratiwi	76
24. Iqbal Sahid	76
25. Yeni Mulyani	77
26. Adri Poesoro	77

Our Programs

Our experienced professional lecturers are ready to share and deliver our expertise, knowledge and practical advice by the following programs.

INTENSIVE COURSE

This program is designed for those who wish to learn in depth about a particular topic in taxation. There are two choices of topics that we provide, namely Transfer Pricing and Tax Treaty Interpretation & Application. With a combination of 70% of material and 30% case study, the program is held for approximately one and a half months including a test (examination) in the last meeting. The learning curriculum of this program is based on international courses attended by DDTCA Academy lecturers. Therefore, this program is also suitable for those who wish to obtain international certification on taxation or related post-graduates program.

PRACTICAL COURSE/WORKSHOP

Practical course/workshop program is designed to provide a balance of "how to do it" with "what is required" as a step-by-step guide in the real work implementation. All participants will benefit from the information provided in all of our practical course/ workshop series. This program consists of a wide range of topics and is held for 1-2 days with a combination of 30% material and 70% case study.

SEMINAR

Seminar program is designed as a one-day (full day) seminar with a variety of domestic and international tax matters. The topics included in this program are advanced topics that are specific, tailored to the current tax issues and developments. Combination of content for each topic dominated by the delivery of material by 70% and the remaining is case study by 30%. Through this program, we will provide you insights in to some of the details and complexities of a range of tax topics that will affect your daily lives.

TRAINING SERIES PROGRAM

This programs are specifically designed for those who are interested in expending their knowledge and experience of tax compliance and assurance, tax policy, dispute resolutions, and transfer pricing. By compiling the topic in series, participants will obtain deep and complete comprehension. As technical delivery of materials, we will provide the new concepts and methods. One of them is to hold a moot court as one method of learning. Thus, the participants can feel the real experience.

IN-HOUSE TRAINING

In this program, we deliver the most comprehensive in-house training to corporations, governments, accounting firms, financial institutions and more, to give you more time to focus on matters most important to you. We develop the contents and training styles on a tailor-made basis.

Learning Methodology



Our Programs

“The training is very practical since it’s supported by some case studies.”

-Lydia Agus, Finance Controller,
PT Shell Indonesia-

CLASSIFICATION	PROGRAM				
	INTENSIVE COURSE	PRACTICAL COURSE/ WORKSHOP	SEMINAR	TRAINING SERIES PROGRAM	IN-HOUSE TRAINING
Time	Approximately One and A half Months	One Day Course and Two Days Course	One Day Seminar	Four Training Series with Different Duration (3 Days, 4 Days, and 7 Days)	In this program, we provide more personal approach to meet with your organization needs. We develop the contents and training styles on a tailor-made basis
Topic	General Topics with Comprehensive Perspectives	Practical Issues and Applied Guidances	Hot Topics and In-depth Elaboration	Professional Tax Specialist Programs	
Certification	With Examination	No Examination	No Examination	No Examination	
Price	Executive Class (IDR 7.500.000)	One Day Course (IDR 1.500.000) and Two Days Course (IDR 4.000.000)	IDR 3.000.000	Prices Range from IDR 6.000.000 - IDR 16.000.000	
Combination of Contents	70% Material	30% Material	70% Material	Based on the Training Itself, Which is Seminar or Practical Course	Based on Request
	30% Case Study	70% Case Study	30% Case Study		

Background



Readiness of human resources is one of the prerequisites that ensures the establishment of an intelligent and critical tax community (tax society), who have a desire to participate in development. Good tax education system produces not only good tax awareness of human resources, but also experts in the field of taxation who will be the locomotive of reform and transformation of the tax system to a better direction.

In 2017, DDTC Academy comes with a new concept and a great stimulating environment to provide the best tax education and training. Through our mission to enlighten and strengthen tax education of Indonesian people as well as the noble desire to be a tax training center that contribute positively to Indonesian taxation system, we believe that DDTC Academy are able to provide training in the field of taxation that would meet the participants' expectations.

DDTC Academy is focused and committed to improve and develop your experience through Intensive Course, Practical Course/Workshop, Seminars, Training Series Program, and In-House Training, with a wide range of topics, either domestic or international topics such as International Taxation, Transfer Pricing, Income Tax, VAT, Tax Policy, Dispute Resolution, Custom, and other interesting topics.

All training programs in DDTC Academy will be presented not only in Bahasa Indonesia but also in English depending on needs.

Our Excellence

Expertise

Domestic



4 Master Degree in Accounting and Taxation from leading universities in Indonesia

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

International



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



9 Master Degree in International Taxation from leading universities abroad



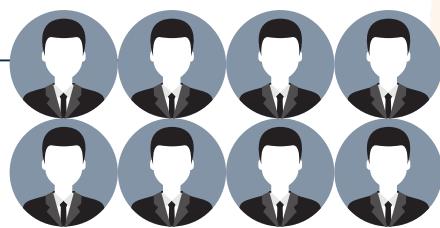
1 Bachelor's Degree (LL.B) in Taxation Law (Fiscal Recht) from Leiden University (Netherlands)



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



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



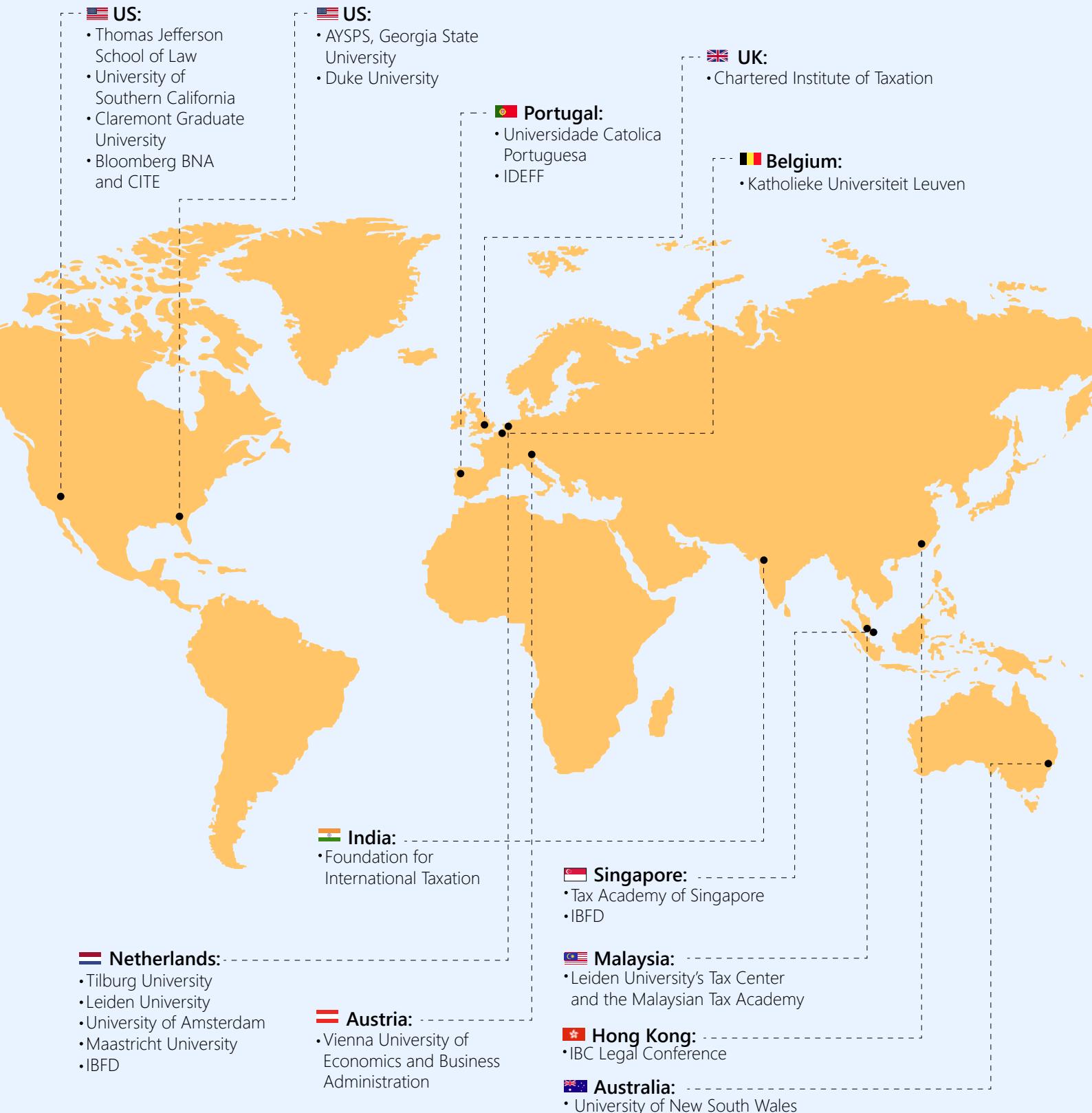
8 Certificate Holders of International Tax Certificate from the Chartered Institute of Taxation (UK), the most in Indonesia



8 Certificate Holders of Transfer Pricing from the Chartered Institute of Taxation (UK), the most in Indonesia

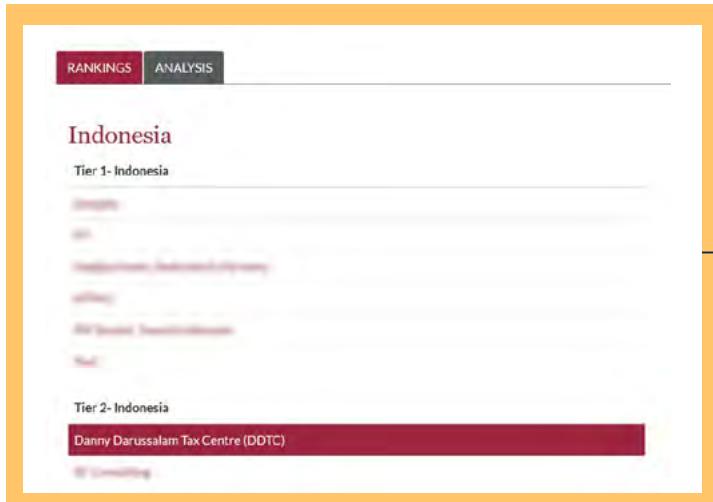
Our Excellence

Investing in Human Capital



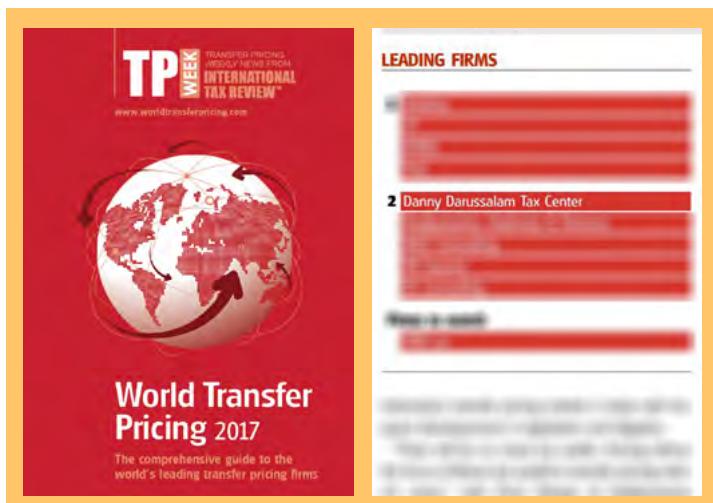
Our Excellence

International Recognitions



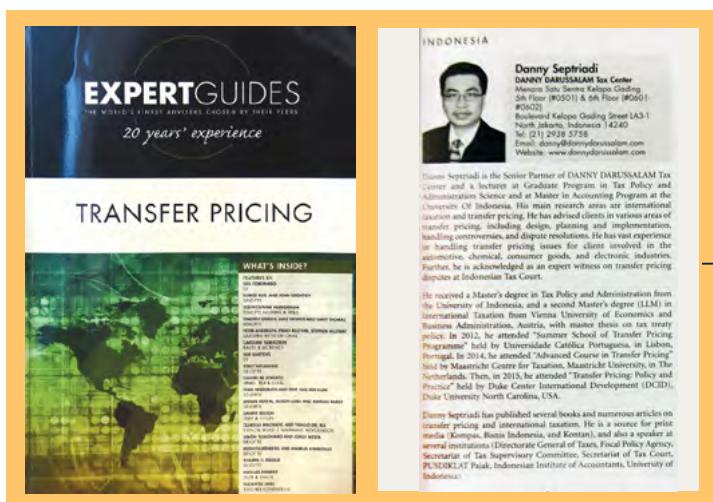
Tier 2 Based ITR World Tax 2016

DDTC is in Tier 2 as the leading tax firm in Indonesia.



Tier 2 Leading Firm based TP Week 2017

DDTC is in Tier 2 of the leading transfer pricing firms in Indonesia **(the only local tax advisor)**.



Danny Septriadi was selected as one of the World's Leading Transfer Pricing Advisers 2015 by Expert Guides (one of the most trusted resources for international buyers of legal services).

Our Excellence

International Recognitions



B. Bawono Kristiaji was chosen as The Winner of CFE Award Albert J. Rädler Medal 2015.

Best thesis on European Taxation awarded by the Confédération Fiscale Européenne (CFE) entitled "Incentives and Disincentives of Profit Shifting in Developing Countries" in academic year 2014/2015 at School of Economics and Management, Tilburg University, the Netherlands.



Yusuf W. Ngantung was chosen as The Winner of WTS Tax Award 2014.

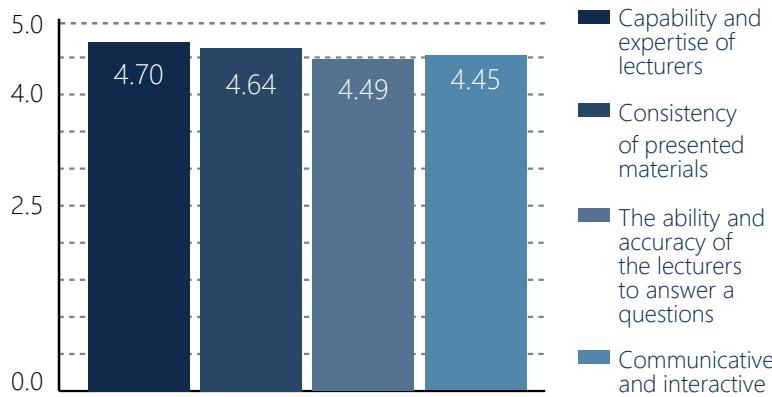
Best master thesis entitled "Tax Treaties and Developing Countries" in academic year 2013/2014 at Vienna University of Economics and Business Administration (WU Vienna). This award was annually held by WU Vienna & WTS Tax Legal Consulting.



Our Competence

Training Evaluation 2016

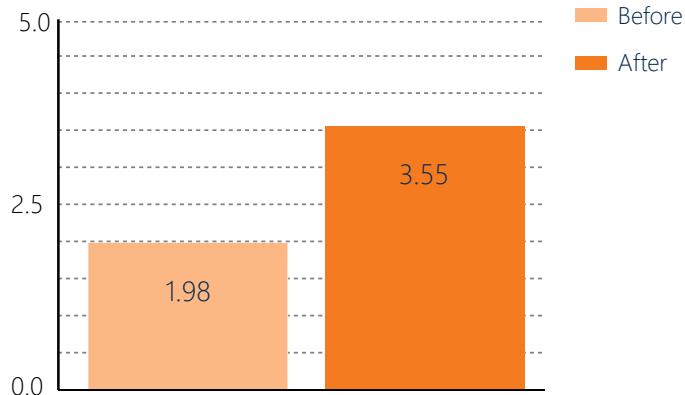
Lecturer's Assessment



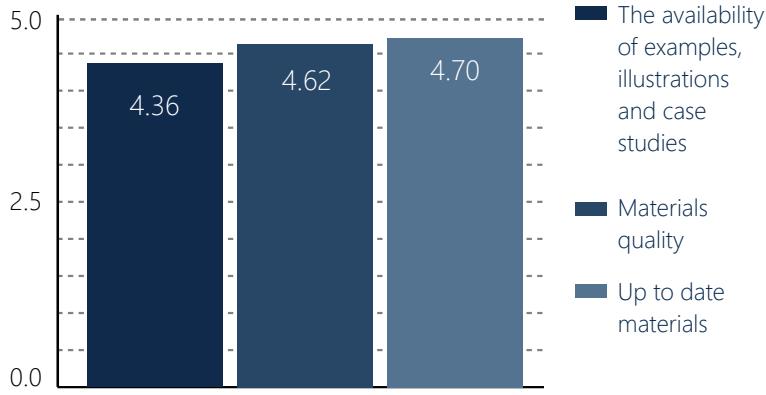
Our post-training surveys show how we have helped participants to acquire the knowledge necessary to manage their tax risk.



Participants' Capability



Material Assessment



Our Competence

MoU with Universities

One of DDTc's mission is an educational mission. The mission is embodied in the form of Memorandum of Understanding (MoU) with well-known universities in Indonesia, including the University of Indonesia, Brawijaya University, Gadjah Mada University, Airlangga University and STIAMI Institute.



Vice Dean for Resources, Ventura & Public Administration, Program study Fiscal Administrative Sciences, University of Indonesia (UI) Titi Muswati (left) and Managing Partner DDTc Darussalam (right) during the handover of MoU.



Managing Partner DDTc Darussalam (left) and Dean of the Faculty of Administrative Science, Brawijaya University (FIA UB), Prof. Bambang Supriyono (right) exchanging the MoU.



Dean of the Faculty of Economics and Business (FEB) Gadjah Mada University (UGM), Prof. Wihana Kirana Jaya (left) and Managing Partner DDTc Darussalam (right) during the handover of MoU.



Rector Institut Sekolah Tinggi Ilmu Administrasi Mandala Indonesia (STIAMI) Panji Hendrasto (left) and Partner DDTc Bawono Kristiaji (right) exchanging the MoU.



Dean of the Faculty of Economics and Business (FEB) Airlangga University (UNAIR) Dian Agustia (second left) and Managing Partner DDTc Darussalam (second right) exchanging the MoU.

Publications

We have published five books covering domestic taxation, transfer pricing and international taxation and we will also publish two new books this year to enrich of transfer pricing and international taxation knowledge in Indonesia and prove that we expert in these fields.

BOOKS



SEMI-JOURNAL MAGAZINE



DDTC NEWS

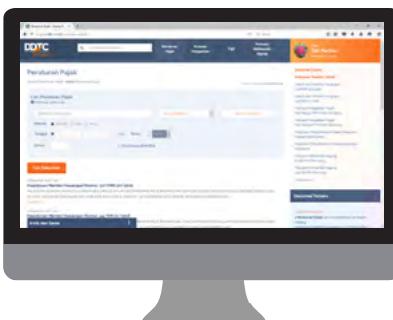


ddtcnews.co.id

INTERNATIONAL JOURNALS



DDTC TAX ENGINE



engine.ddtc.co.id

WORKING PAPERS



Facilities

As a tax training center, we have complete facilities and meet the standards, such as:



Library



Moot Court Simulation Room



Theater Class

- The best and most comprehensive professional training facilities (theater classes, free Wi-Fi, modern facility, moot court simulation room);
- Library access of more than 2000 taxation books and journals;
- Exclusive training kit (goodie bag, notepad, pen);
- Getting 'Kartu Peserta Training' that can be used as a discount card to attend re-training and purchase DDTC publications.

Intensive Course Program

Our tax knowledge elevating trainings are delivered by our dedicated professionals, which are supported by a dedicated tax research team to remain up to date with constant change and to adapt with new challenges.



Intensive Course Program

1. Transfer Pricing – Executive Class

Today, most of the countries around the world start to address the development of multinational structures. Over the years, these various governments including the Indonesia government have realized the risks associated with price manipulation by international groups in their cross-border transactions. Transfer pricing rules exist to address the potential mismatch between profits allocated and the distribution of risks, assets and functions across multinational groups. Many developing countries are inexperienced in dealing with transfer pricing issues and their top priority is to assess the level of potential transfer pricing risk in their own countries and to increase their capability and capacity in their tax administration to effectively address that risk.

Topics Covered:

1. Introduction, Basic Framework and Trends in Transfer Pricing
2. Arm's Length Principle and Functional Analysis
3. Transfer Pricing Methods
4. Comparability and Measurement of Arm's Length
5. Specific Transactions
6. Compliance Issues and Dispute Resolutions
7. Workshop Transfer Pricing Analysis in Practice and Moot Court

In order to develop an understanding of transfer pricing principles and methodologies, consideration of their practical application is paramount. Hereby, DDTC Academy provides the intensive course program to introduce participants to the transfer pricing principles and methodologies which are complemented by case studies.

The focus of this course is on the requirements of the OECD Transfer Pricing Guidelines, UN Manual on Transfer Pricing and Indonesia tax regulation that can arise in the application of these requirements. Further, the developments related to the OECD/G20 Based Erosion and Profit Shifting (BEPS) project will also be covered in this course.

Course Schedule:

- Batch 12 (4 March - 15 April 2017)
- Batch 13 (15 July - 26 August 2017)
- Batch 14 (28 October - 9 December 2017)

Activity Time (Per Batch):

Every Saturday from 09.30 a.m. to 03.30 p.m.

Session (Per Batch):

5x sessions + 1x exam

Investment (Per Batch):

IDR7.500.000,-



We develop
our lecturers
through
overseas
learning.

Intensive Course Program

2. Tax Treaty Interpretation & Application – Executive Class

Tax treaties are a global phenomenon. There are over 3000 bilateral tax treaties concluded by different countries world-wide, yet the wording and structure of such treaties are to a large extent the same. As international treaties, tax treaties are subject to the same rules of interpretation as other countries. The understanding of tax treaty interpretation and application therefore, provides unique opportunities for tax practitioners and interested parties alike. This course is designed for participants wishing to expertise in international tax laws with a perfect combination between theory and practice in concrete experience based on real cases.

Course Schedule:

- Batch 5 (15 July - 26 August 2017)
- Batch 6 (9 September - 21 October 2017)

Activity Time (Per Batch):

Every Saturday from 09.30 a.m. to 03.30 p.m

Session (Per Batch):

5x sessions + 1x exam

Investment (Per Batch):

IDR7.500.000,-

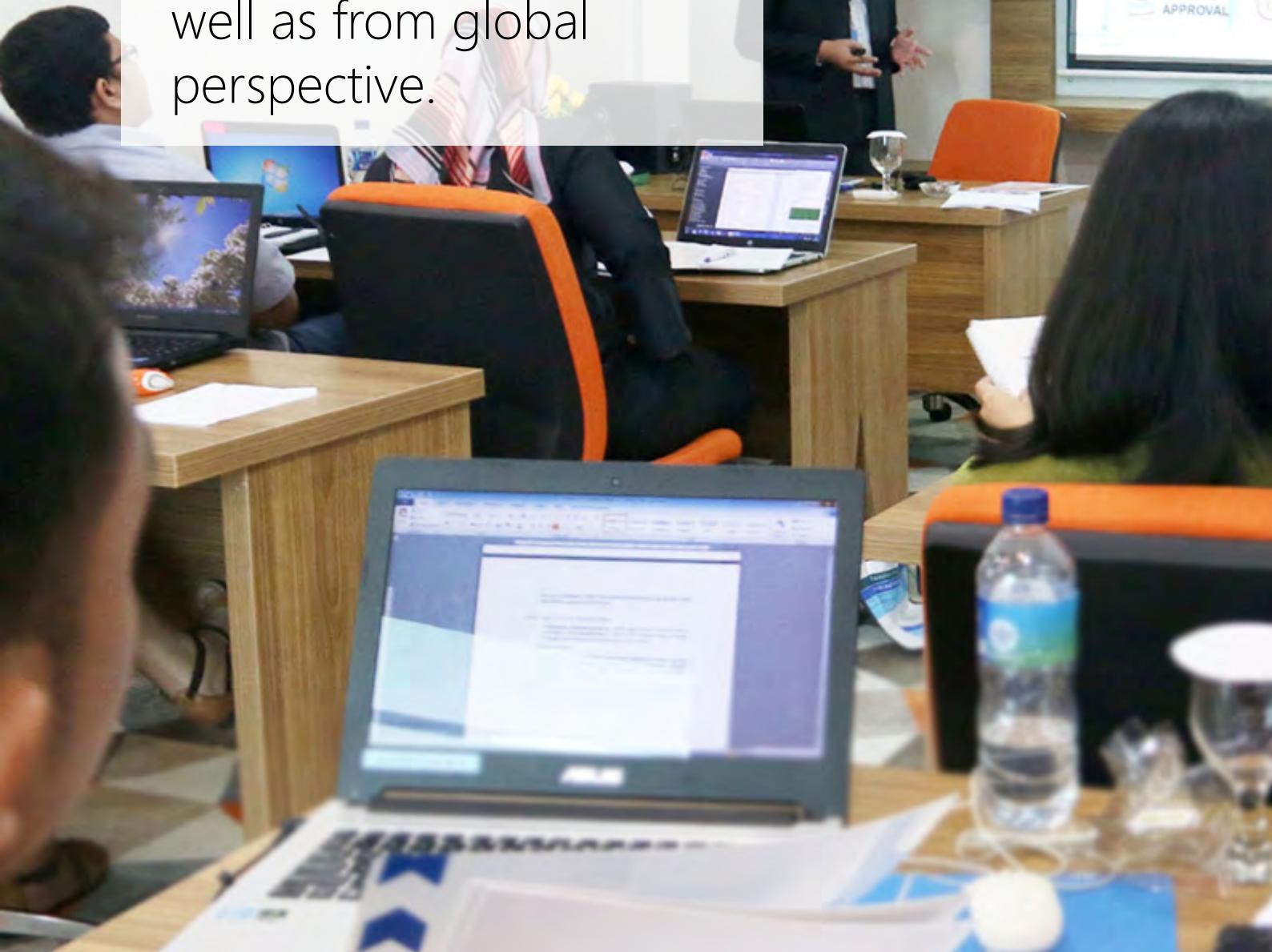
Topics Covered:

1. Structure of tax treaties: The application practice, interaction of domestic law and treaty law, importance of the scope of the convention term with regard to persons and taxes covered, distributive rules and methods for elimination of double taxation
2. Interpretation: rule of Art. 3 (2) OECD Model Convention, relevance of OECD Commentary and modifications in practice
3. Abuse of tax treaties: Where are the limits? analysis on Google Double Irish Dutch Sandwich structure, other multinationals tax structures and recent developments
4. Business profits (Art.7) and connection with other distributive rules, Permanent Establishments (Art.5), Passive income (Art. 10, 11, and 12), Capital Gains (Art. 13) and indirect transfer of shares
5. Income from dependent work (employees); 183 rule
6. Artistes and Sportsmen (Art. 17), with real case examples (U2 case)



Practical Course / Workshop

We are confident to provide participants in-depth knowledge in terms of the concept of practical approach to a variety of tax issues and the latest developments from domestic as well as from global perspective.



Practical Course / Workshop

1. Tax Compliance post-Tax Amnesty

Tax amnesty program implemented since July 2016 has drawn much public attention. One proof is the enthusiasm of taxpayers who participated and implemented their rights to participate in the first period of tax amnesty which ended on September 30, 2016. According to the Directorate General of Taxes statistics, tax amnesty achievement in the first period, which lasted from July to September 30, 2016, the total repatriation of funds reached IDR137 trillion. While the total redemption money subscription reached IDR97.2 trillion or over 50% of the target of IDR165 trillion as of March 31, 2017. Entering the second phase which began in October 2016 and ended on December 31, 2016, the value of the redemption proceeds or property tax amnesty declaration continued to grow.

Topics Covered:

1. Procedures for reporting to DGT post-Tax Amnesty
2. Practice of making a report to DGT post-Tax Amnesty
3. Tax compliance post-Tax Amnesty (How to report tax return and financial statement)
4. How to prepare working paper to analyze potential tax issues post-Tax Amnesty

The struggle of taxpayers who participate in tax amnesty program is not complete because there are obligations that must be fulfilled by the parties after the tax amnesty. One of them is the obligation to submit a report to the Director General of Taxes as stipulated in Article 38 paragraph (1) PMK 118/PMK.03/2016. Implementation of this obligation is very important due to the sanctions that will be given to the party which fails to implement. In addition, Tax Amnesty also has an impact on another tax liability for taxpayer. Especially for tax payers who face specific cases before participating in tax amnesty.

This course will provide a full understanding about tax compliance that should be conducted by taxpayers post tax amnesty.

5. Tax Compliance Testing and Investigation by using management data resulted in Tax Amnesty

Course Schedule:

Thursday, 2 February 2017 (09.00 a.m. - 05.00 p.m.)

Investment:

IDR1.500.000,-



Because the struggle of taxpayers who participate in tax amnesty program is not complete. There are obligations that must be fulfilled by the parties after the tax amnesty.

Practical Course / Workshop

2. Legal Proceedings in the Tax Court

Tax dispute resolution at the judicial level is first settled in the Tax Court. Accordingly, taxpayers who want to challenge the decision of the DGT should be prepared to carry the appeal process at least to the Tax Court. The Tax Court will only be able to accept an application for a lawsuit or appeal from the taxpayer. If the taxpayer or tax authority wants to challenge the Tax Court decision, either or both could file a civil review to the Supreme Court. Decisions of the Constitutional Court are final, binding and cannot be appealed.

Topics Covered - Day 1:

1. Legal system of tax court and dispute resolution
2. Concept and application of tax appeal procedures
3. Audit "fundamentum petendi" and DGT's assessment
4. Documents to be prepared by taxpayers and tax attorneys in the beginning of litigation process
5. Burden of proof arguments
6. Strategy and management of evidence at the court

Topics Covered - Day 2:

7. Moot court simulation
8. Procedure and application of the submission judicial review

Further, to maximize their position upon tax dispute proposed, taxpayer needs to know and understand the mechanism of legal proceedings in the Tax Court. This course is designed specially to discuss all the problems that might arise when taxpayers take on their dispute upfront tax court and will also provide a useful refresher from experts who have more experience in the field.

Course Schedule:

Tuesday - Wednesday, 21 - 22 February 2017
(09.00 a.m. - 05.00 p.m.)

Investment:

IDR4.000.000,-

“Dengan mengikuti pelatihan ini, saya dapat ‘feel’ nya secara langsung berhadapan dengan majelis hakim. Karena selama ini hanya diwakilkan kepada kuasa”

-Adel Bustami, Tax Manager,
Coca-Cola Indonesia-



Practical Course / Workshop

3. Taxation of Business & Investment Activity

Nowadays, there are two main economic activities that can be run to earn income, i.e. business activities and investment activities. These two activities cannot be separated from tax implication contained therein.

The first is business activity. All business activities will not be spared from tax liability. Although the business activity involved is only small to medium-sized, business owners still have the obligation to pay taxes. In other words, tax has a very strategic position in business. Therefore, before determining business policies, business owners need to integrate tax rules in them. Business owners need to understand the aspects of any tax arising from any transaction that they conduct, both aspects of the tax effects on their business activities and the effect on themselves as a taxpayers. In this case, business people must have a clear understanding of taxes, both income tax, VAT, and other taxes.

Topics Covered:

1. Taxation for Business Activity
 - Corporate Income Tax implication
 - Withholding Tax implication
 - General Administrative Procedure of Withholding Tax
 - VAT implication
 - General Administrative Procedure of VAT
 - Income Tax implication for the business owner
 - General Administrative Procedure of Personal Income Tax for business owner
2. Taxation for individual investment
 - What is an investment
 - Types of income earned by individual investment and its tax implication
 - Deductible expenses
 - Basis of assessment
3. Taxation of Investment Holding Companies
 - What is an investment holding company
 - Types of income earned by investment holding company and its tax implication

Other than business activity, investment activity is also an activity that aims to generate income, either investments by individual or by companies. What should be highlighted here is the ownership of investment also has tax implications of its own. This is certainly different from taxes generated from business activities. Therefore, understanding this is also very important for business people who want to 'play' in the investment world.

However, the understanding of it is not limited to the concept, but also includes an understanding of the procedures and administration in the field. With a thorough understanding, business owners and investors can avoid tax risks that arise in the future.

This course is designed for individuals and companies that conduct business or own investments such as properties and shares for long-term investment and derive investment income such as rental, dividend and interest, which could be from Indonesia or overseas.

- Deductible expenses
 - Basis of assessment
4. Selected issues: investment dealing company

Course Schedule:

Every Tuesday, 09.00 a.m. – 05.00 p.m.

- Batch 1 (21 March 2017)
- Batch 2 (4 April 2017)
- Batch 3 (8 August 2017)

Activity Time (Per Batch):

09.00 a.m. to 05.00 p.m.

Investment:

IDR3.000.000,-

The understanding of taxation for business and investment activity is not only limited to the concept, but also the procedure and administration in the field.

Seminar

We are focused and committed to improve and develop your experience with a variety of seminar options we offer which are open for all taxation stakeholders, business owners, investors, up to academics.



Seminar

1. Domestic & International Corporate Tax Planning

This seminar is designed to provide participants who deal with international tax planning in practice with updates on domestic tax regulation, relevant tax treaty, and transfer pricing developments that are relevant to their day-to-day work.

This seminar focuses on a number of common domestic and international tax planning tools and the role that tax treaties and transfer pricing play in

international tax planning strategies. It covers, through a combination of formal presentations and complex case studies, some common structures that rely on tax treaties and transfer pricing and the risks associated with their use in tax planning.

The seminar is suitable for practitioners in tax advisory firms, tax specialists in commerce and industry, and government officials.

Topics Covered:

1. An overview of domestic and international tax planning methods and their relative importance
2. The international tax treaty issues relevant to tax planning of treasury functions
3. Supply chain restructuring and intangibles, as well as specific transfer pricing considerations in these areas
4. Current Tax Issues:
 - The effectiveness of anti-avoidance measures such as GAARs, CFC regimes, thin capitalization rules and treaty anti-abuse rules
 - Transactions involving intangibles
 - Application of treaty concepts to profits derived from the delivery of digital goods and services and services

Course Schedule:

Thursday, 9 February 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

“Planning techniques are described in a neutral and concise manner, without necessarily taking into account a specific jurisdiction but based on the principles that underline them.”

-the Authors of Fundamental of International Tax Planning-



Seminar

2. Updating Foreign Account Tax Compliance Act (FATCA) & Automatic Exchange of Information (AEOI)

Automatic Exchange of Information (AEOI) to exchange financial account information in tax matters internationally, is much in the news these days. This new global initiative is intended to reduce possible (offshore) tax avoidance and evasion. There are at least two types of frameworks on exchange of information that will impact Indonesian taxpayers and financial institutions.

Firstly, The Foreign Accounts Tax Compliance Act (FATCA) launched by US. FATCA provisions impose a 30% withholding tax on certain U.S. source of payments made to foreign financial institutions (FFIs) and non-financial foreign entities (NFFEIs). This provision is intended for such entities that refuse to identify certain U.S. investors, even if such U.S. persons directly or indirectly hold only

non-U.S. assets. The provisions are effective for payments made after January 1, 2013 and will be implemented in 2017.

Secondly, Global Forum on Transparency and Exchange of Information for Tax Purposes – OECD set-up a new AEOI framework. Participating jurisdictions that implement AEOI exchanged their pre-agreed information each year, without having to send a specific request. To implement this global standard, the participating jurisdictions should refer to a model agreement, a common reporting standard (CRS), a commentary on interpretation and basic data for an information technology solution. This model is also endorsed by G20 and will be implemented by Indonesia in 2018.

Topics Covered:

1. Introduction: Recent Updates of AEOI
2. Fundamental Concept and Critical Point of FATCA
3. Updating FATCA regulation
4. Framework and Model of CRS
5. Legal framework in Indonesia to Implement FATCA and CRS
6. Expected Implications for Indonesian Taxpayers and Financial Institutions

Course Schedule:

Tuesday, 7 March 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

“Latar belakang dan konsep FATCA & CRS dijelaskan dengan bagus.”

-Irawati, Manager Corporate Tax,
PT HM Sampoerna Tbk-



Seminar

3. Advanced Indonesian Value Added Tax (VAT) - Selected Issues

VAT is becoming increasingly more important throughout the world. Indonesia was one of countries that implement VAT system since 1985 to replace the previous sales tax system. Despite the fact that has been applied for a long time, not everyone is familiar with this form of taxation and the impact of this tax system to business activity. Given these important developments and interests, this seminar starts by identifying the concept and general application of VAT.

Topics Covered:

1. Concept and Application of VAT
2. Special Industry
 - VAT on mining sectors in the form of a Contract of Work or a Production Sharing Contract
 - VAT on Immoveable Property
 - VAT on Financial Services
 - Comparative Study: VAT in EU
3. Special Transaction
 - Zero Rate, Exemption
 - VAT Integrated

The main purpose of this seminar is to provide academic knowledge and understanding in the field of Value Added Tax (VAT) in business activity. The seminar also deals with policy and practice problems in Indonesian VAT. The emphasis of this seminar is on the VAT treatment of cross-border transactions and the impact thereof on decision-making processes concerning multinational enterprises when conducting their business.

4. VAT Treatment on Personal use and Provided Free of Charged
5. International Transaction
 - Import
 - Export
 - VAT on Cross-Border Services/Intangible: Telecommunication, E-Commerce

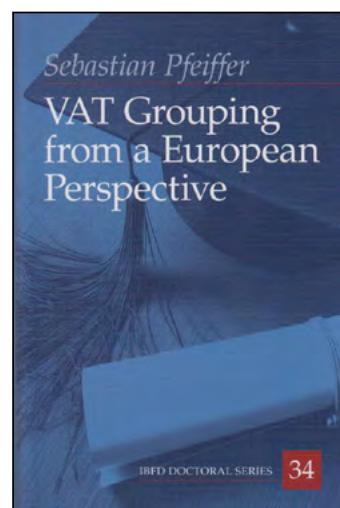
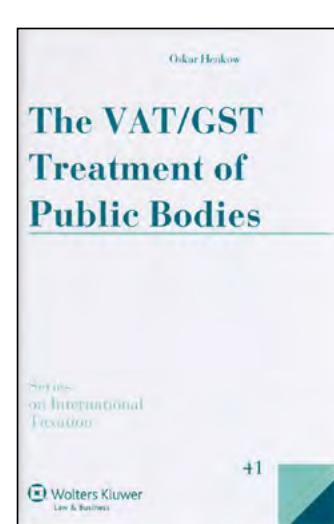
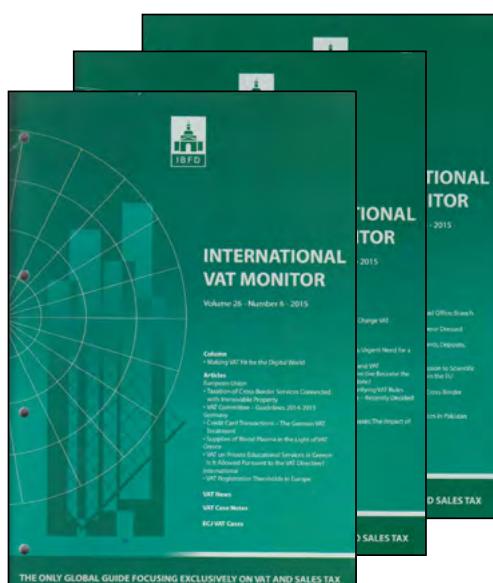
Course Schedule:

Tuesday, 14 March 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

Some of our VAT books. Visit our library to read these.



Seminar

4. Recent Development and Emerging Issues of Oil & Gas Taxation

Exploration, development and producing companies and their investors in oil and gas industry are addressing the significant extent of tax issues, like a transfer pricing, and investment issues that are specific to it. This industry has specialized in capital cost recovery rules for geological and geophysical costs, intangible drilling and developments costs and depletion, complex rules for transfers of oil and gas property interests (pool of capital, sale versus lease) and partnership rules.

To govern proper tax treatment of oil and gas transactions, one needs to have a basic understanding of the primary concept about oil and gas industry such as the upstream primary midstream, and downstream. Therefore we designed a seminar to provide participants with in-depth analysis of international taxation and transfer pricing issues that are commonly found in the oil and gas industry. We also provide insights on how these issues are managed.

Topics Covered:

1. Introduction to oil and gas industry
 - Kinds of mineral property interest
 - Cross-border tax implications
 - Relation domestic tax laws at source and jurisdiction
 - Economic interest and unit property concepts
2. Domestic taxation of oil and gas
 - PP 79/2010
 - Head office overhead cost
 - PMK 257/2011
 - OECD Model Commentaries vs PSC
3. Key issues

Course Schedule:

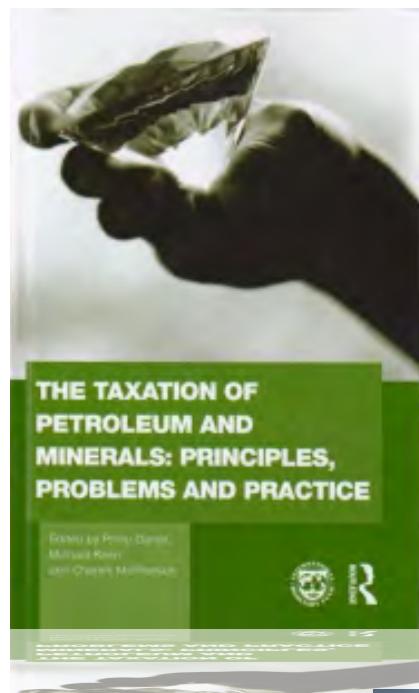
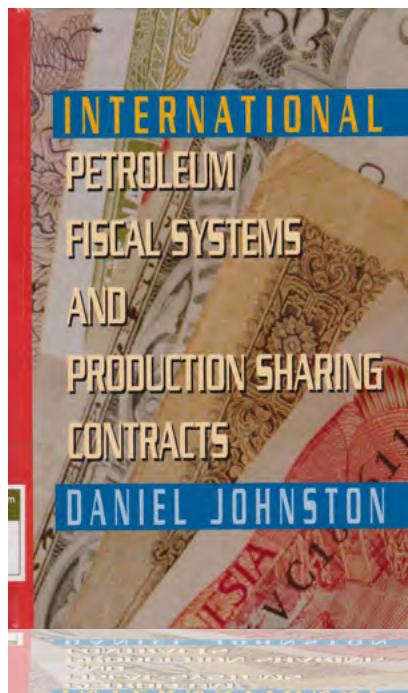
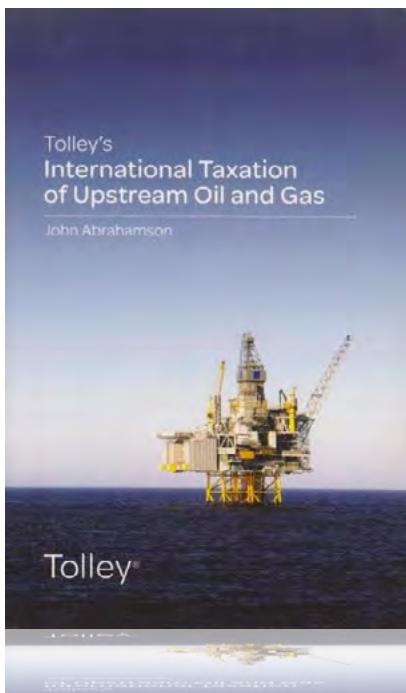
Thursday, 13 April 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

**“Mentor (pengajar)
memiliki pengetahuan yang
excellent, penuh informasi
dan pengetahuan bagi saya
pribadi.”**

-Lini Amy Berlian Tampubolon,
Manager Treasury & Tax,
PT Perusahaan Gas Negara Persero Tbk-



Seminar

5. Connection between Transfer Pricing, Custom Valuation & Voluntary Declaration

Customs and transfer pricing rules are designed to reach arm's length value, but the differences in the processes and valuation standards may mean that transfer prices set for income tax purposes do not withstand the scrutiny of customs authorities, or vice versa. This seminar explains the significance of different views between tax and customs authorities in cross border business environment, which typically could create tension between these regimes and make it difficult to manage transfer pricing and customs in a coordinated manner. At a glance, our approach to deliver this topic is by explaining the sample case by case or issue encountered by an enterprise.

Our detailed key differences in approach and process are as below:

- Customs procedures and scrutiny occur in real-time as customs officials will investigate products and pricing as the goods are imported. Transfer pricing occurs after the fact as it is based on annual filings, tax returns and documentation studies covering the entire financial year. Tax authorities can review annual tax returns, often months or years after the actual transaction has taken place.
- Customs officials tend to look at transactions on a case-by-case basis as they are interested in import values for each customs entry. Tax officials tend to

focus on aggregated or legal entity level results. The consequence of this is that customs officials are likely to focus on price comparisons while tax officials often turn to margin comparisons. This often makes it difficult for customs authorities to take any holistic view on the business model or any strategic reasons for low import values. This can be better communicated to tax authorities who review the overall tax return and get a snapshot of their business.

- Customs officials generally focus on goods only, while tax officials can look at tangibles, intangibles and services. However, some payments for intangibles may give rise to customs duties as well. These issues are sometimes overlooked when setting transfer prices.
- There is an inherent tension and a conflict between the objectives of customs and transfer pricing authorities, as customs would like to see inbound prices maximized whereas tax authorities in the importing countries would look for low inbound prices which maximize profits for the local entity.
- Transfer pricing regulations may lead to greater voluntary or imposed adjustments to taxable profits on an ex-post basis. These adjustments will typically lead to challenges on the customs side.

Topics Covered:

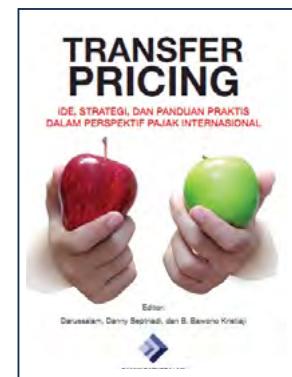
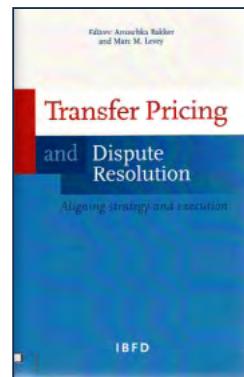
1. Background and introduction: mapping the problems
2. Comparison between customs and transfer pricing: exploring some key differences and similarities
3. Voluntary declaration
4. Seeking for integration or joint approaches of customs and transfer pricing
5. Transfer pricing from OECD policy framework vs. customs value from
6. WTO perspective
7. Comparative study
8. Administration issue
9. Compliance and disputes resolution

Course Schedule:

Tuesday, 18 April 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-



Seminar

6. Taxation on Shipping & Aircraft

Generally, tax regulation on shipping and aircraft is quite simple. However, the development of the types of transaction in shipping and aircraft has made these tax issues interesting to study further. The special nature of shipping and aviation activities is also reflected by the fact that in most tax treaties, the tax treatment of shipping and aircraft is discussed separately in a special article.

Topics Covered:

1. Overview: types of income from shipping and aircraft activities
 2. Corporate income tax aspect of shipping and aircraft
 3. Withholding tax on income from shipping and aircraft activities
 4. Permanent Establishment requirement in determining the taxation of shipping and aircraft

This seminar is intended for shipping and aircraft entrepreneurs and companies as well as tax professionals who wish to obtain in-depth knowledge about the taxation of shipping and aircraft activities. In this seminar, the participant not only will gain overall concept, but also, practices and cases about taxation of shipping and aviation activities

5. Value Added Tax (VAT) on shipping and aircraft activities
 6. International tax on income from shipping and aircraft activities

Course Schedule:

Thursday, 4 May 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

The development of the types of transaction in shipping and aircraft has made these tax issues interesting to study further.

Seminar

7. International Tax Structuring for Real Estate & Immovable Property Investments

When investing in real estate an initial consideration should be how to minimise the tax burden with respect to the prospective sale of the property. The choice of the legal form of the company acquiring the property (the property holding company) can determine a tax-optimised future sale. Considerable differences in taxation also result from the type of the sale: by way of an asset deal or share deal. Therefore, tax structuring of real estate investments aims at, among other things, minimising or avoiding the trade tax burden.

The seminar will deal with the tax planning opportunities and risks regarding acquisition, holding and financing activities related to real estate and post-acquisition structuring, as well as disposition of foreign movable and immovable property investments.

Topics Covered:

1. Overview of relevant business considerations in making immovable property investments
2. International tax related to the real estate sector and immovable property investments across jurisdictions
3. VAT related to the real estate sector and immovable property investments across jurisdictions
4. Tax Planning concepts in the real estate sector and immovable property investments
5. Transfer tax issues and case study
6. Boundaries related to the sector in the post-BEPS world

Participants will explore the fundamental tax consequences of business decisions on cross-border investments through a comprehensive case study. In the final session of the seminar, some domestic legislations will be looked at in specific details and an expert panel Q&A will be conducted to discuss the participants' questions and the most pressing issues.

The seminar is ideal for in-house tax directors and/or managers and CFOs and/or financial staff of real estate owners, developers, REITs, investment advisers, asset management companies, pension funds, mortgage brokers and bankers, advisers and government officials working with enterprises or individuals involved in the real estate sector or managing immovable property investments.

Course Schedule:

Tuesday, 18 July 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

We will deal with the tax planning opportunities and risks regarding acquisition, holding and financing activities related to real estate.



Seminar

8. Taxation on Digital Economy and E-Commerce

Today, data, digitized goods and services are generated without physical or territorial limitations. A current model business has changed and virtually all commerce is digital. The Indonesian government reacts to this challenge and releases the roadmap of e-commerce to become a national agenda. In domestic taxation, the only tax regulation in Indonesia confirms that e-commerce follows the existing tax provisions. Nevertheless, tax rules have not kept pace with the changing business environment, including the growing importance of the digital economy. OECD and G-20

project called an Action Plan for the taxation of digital economy.

This seminar is dedicated to anyone who is interested in tax challenges of the digital economy and e-commerce business. This seminar will not only discuss domestic tax issues arising from the domestic trade of digital goods and services, but also from the international tax perspective of digital business. Material in this seminar will cover the practice of taxation of digital economy in other countries and challenge faced by taxpayers in an era of changing landscape of taxation.

Topics Covered:

1. Overview of Current Regulation
2. Principle of E-Commerce Taxation
3. BEPS Action Plan 1: Taxation of Digital Economy
4. Permanent Establishment Issues in the Era of Digital Economy (Virtual Permanent Establishment and Digital Presence)
5. Withholding Tax Issues on Digital Transactions
6. Taxation of Cloud Computing

7. VAT Issues on Digital Transactions
8. Comparative Taxation on Digital Companies

Course Schedule:

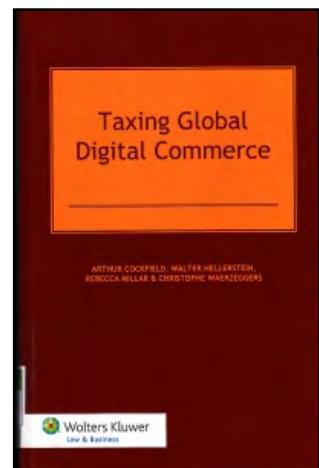
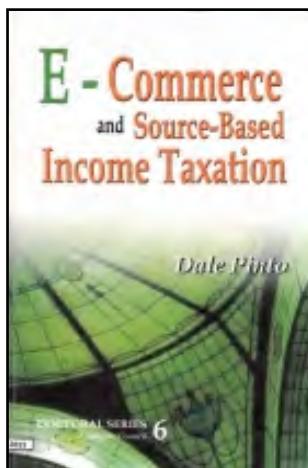
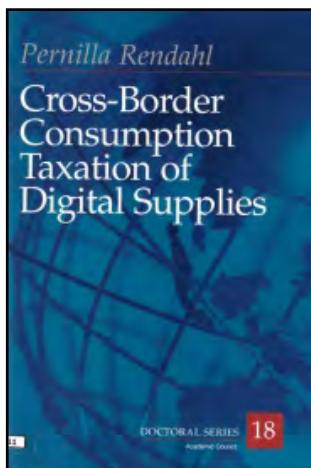
Tuesday, 19 September 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

Today, data, digitized goods and services are generated without physical or territorial limitations. Therefore, knowledge about taxation on digital economy and e-commerce, domestic and international, become important.

Some of our E-Commerce books. Visit our library to read these.



Seminar

9. Taxation of Intercompany Financing

Different tax treatment among debt and equity creates a distortionary effect on financing decision. Financing strategy through debt is more preferable regarding to tax base reduction, and as a consequence, lower cost of capital. This is also supported by the idea of the optimal value cost of capital which can be measured through a weighted average of the cost of debt and cost of equity (weighted cost of capital), where cost of debt is considered after tax cost of debt. As a result, taxable firms will react by preferring more debt in their capital structure, particularly in the context of cross-border financing.

The idea of cross border excessive debt will be much more important if they take place within multinational enterprises (intra-group). With their common strategy

Topics Covered:

1. Tax debt bias and business behavior
2. Hybrid financial instrument
3. OECD/G20 BEPS Action 2 and 4
4. Thin capitalization and interest limitation rule
5. Debt to equity ratio vs. arm's length capital structure
6. Arm's length financing behavior and interest rate
7. Managing tax compliance toward DER rule in Indonesia

and ability to coordinate under the same effective control, multinational enterprises would have the flexibility to build any debt scheme and to place debt in a high tax country. For instance, the use of hybrid financial instrument has gained significance in international finance, while thin capitalization and back to back loan has received attention from G20 countries on their BEPS project. Further, intercompany financing also received some attention from transfer pricing issues. Apart from the theory and intentional best practices, the seminar concludes with recent domestic law and how companies should comply with the rules.

Course Schedule:

Tuesday, 10 October 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

External funding has become more challenging and stricter. This is how intercompany financing becomes an alternative for company funding.



Seminar

10. Taxation on Professional Income

Since 2015, Directorate General of Taxes has planned to implement more intensively imposing personal income tax from individuals with strategic professions such as consultants, lawyers, doctors, architects, appraisals, directors, and others. This was triggered by a growing number of individuals that conduct the professions. Not only is that professional work done in the country, but has also expanded abroad. As a result, the potential tax revenue from that income is predicted to be very high.

Topics Covered:

1. Domestic taxation perspective on professional income
 - Tax regulations related to professional income
 - Definition of professional
 - Scope of professional income
 - How to calculate tax on professional income
 - General provision and administrative taxation procedure of professional income
 - How to comply with your tax on professional income
2. International taxation perspective on professional income

One of the Directorate General of Taxes' efforts to increase tax revenue from professional income tax is to enforce compliance in personal income tax on professional income. This means, for taxpayers who perform this profession, understanding of tax aspect on income from professional work is very important, so that taxpayers will still comply and not face tax issues in the future.

- International tax on income from dependent personal services
 - International tax on director fees
 - International tax on entertainers and sport person
3. Case study

Course Schedule:

Tuesday, 24 October 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-



Seminar

11. Transfer Pricing post BEPS-OECD/G20

At the end of 2015, the OECD, together with G20, completed a framework which contains measures in anticipation of and response to BEPS practices that have become a global problem. This framework consists of 15 BEPS recommended action plans for the countries of the world to be further accommodated by domestic regulations. Indonesia as a G20 member country participates and supports the implementation of these BEPS action plans.

To be able to apply and work together with a BEPS action plan, Indonesia needs to make adjustments to the

provisions of domestic regulation. These adjustments will certainly give their own influence on the tax system in Indonesia and the effect would be felt primarily by multinational companies that conduct a great deal of cross-border transactions as well as having international tax planning schemes (international tax planning).

Owing to this fact, multinationals are demanded to immediately prepare for the changes that will occur from the application of BEPS action plans in Indonesia. Therefore, an understanding of BEPS and the action plan and the implications and plans to apply in Indonesia is very important to know.

Topics Covered:

1. Background
2. What is BEPS?
3. BEPS Actions: An Overview
4. The transfer pricing Action Plans, which may have an impact on a company's operation (Action 4, 8 – 10, 12 & 13)
5. Understanding the implication of BEPS for Indonesia

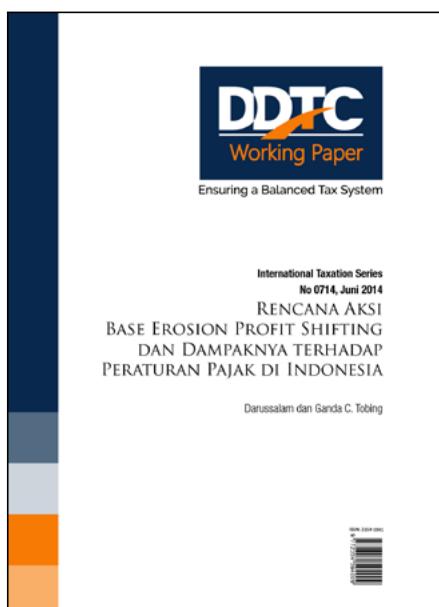
Course Schedule:

Tuesday, 14 November 2017 (09.00 a.m.–05.00 p.m.)

Investment:

IDR3.000.000,-

Our Working Paper and InsideTax Magazine. Free download at ddtc.co.id



“We need an international tax transfer pricing regime for the 21st century, one based on 21st century multinationals.”
-Eden-

Training Series Program

We trust that we have the ideal combination of experience, knowledge, and resource needed to provide our training series programs to you. Our credits are proven with vast track records with a high rate of success, work product quality, and in depth-knowledge.

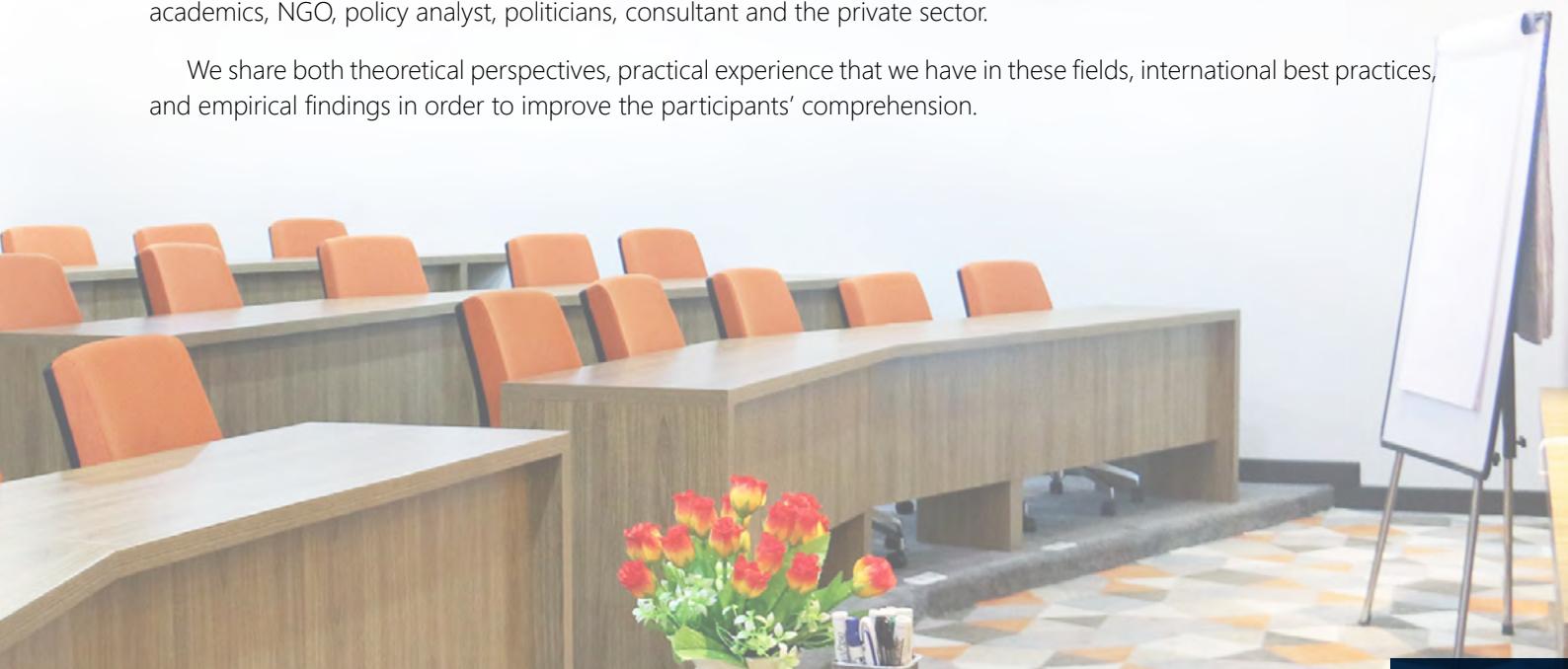
DDTC has a good reputation for its expertise in transfer pricing services, international taxation, and general tax compliance services. It is proven by the international achievement from International Tax Review (ITR) that classified DDTC as tier 2 in transfer pricing firms in Indonesia. This year, DDTC is also in tier 2 as the best tax firm in Indonesia according to World Tax 2017, International Tax Review (ITR). This makes DDTC the only local tax advisors with no affiliations included in the tiers.

In a relatively young age, DDTC has had a variety of experiences in the field of transfer pricing, general tax compliance services, and also dispute resolution. Supported by a team with strong educational background and in-depth experience in handling multinational companies' tax problems, DDTC's respectable position is acknowledged by any stakeholders, including tax authorities, business specialists, and other parties. In addition, client's satisfaction is shown by the high rate of successive arrangement by 95%.

DDTC has also been acknowledged for its contribution as the government's sparring partner in tax policy and administration issues. Today, there is a strong concern in the tax arena as the proportion of revenue from this sector has escalated while at the same time the idea of fiscal sufficiency was one of the government's agenda. With the consideration that improvement and reforms in the taxation sector should be balanced with the availability of tax policy experts, we initiated to launch this program.

With the consideration that one of DDTC's purpose is to raise tax professionals' competency in Indonesia, we are willing to share our knowledge and expert experience in these fields through this program. Contents of this program is designed for professionals, consultant, private sector, professionals from central government agencies as well as local, academics, NGO, policy analyst, politicians, consultant and the private sector.

We share both theoretical perspectives, practical experience that we have in these fields, international best practices, and empirical findings in order to improve the participants' comprehension.



In 2017, we offer four training series program in the following areas:

A. Tax Compliance and Assurance Series

1. Practical Course - Preparation and Calculation of Corporate Income Tax 2016
2. Practical Course - Tax Accounting and Fiscal Reconciliation
3. Practical Course - Tax Diagnostic Review & Due Diligence

B. Tax Policy Training Series

1. Seminar - Tax Policy and Administration Course
2. Seminar - Fical Decentralization and Local Tax Management Course
3. Seminar - International Tax Policy

C. Dispute Resolution Series

1. Seminar - Updating Procedure of Tax Audit and Dispute Resolution
2. Practical Course - Withholding Tax, VAT, and Corporate Income Tax Dispute Resolution
3. Practical Course - International Tax Dispute Resolution

D. Transfer Pricing Series

1. Practical Course - Transfer Pricing Documentation
2. Practical Course - Transfer Pricing Valuation
3. Seminar - Transfer Pricing Audit and Dispute Resolution Procedures (MAP & APA)
4. Practical Course - Transfer Pricing Audit and Case Law

A. Tax Compliance and Assurance Series

1. Practical Course - Preparation and Calculation of Corporate Income Tax 2016

One of the obligations that must be met by the taxpayer is to deliver the Annual Income Tax Return correctly, completely, and clearly. Correct is right in the calculation, including the application of the provisions of tax legislation, in writing, and in accordance with the actual situation. Complete is loading all the elements relating to taxes and other elements that must be reported on the

Notice. Clear is to report the origin or source of taxes and other elements that must be reported on the Notice.

In order to meet the requirements of Annual Income Tax Return, participants will be given training courses related to that issues.

Topics Covered:

1. Setting up a working paper calculation Annual Income Tax Agency by using Microsoft Excel, including the calculation of depreciation and fiscal amortization
2. Identifying the final income tax payable and income not subject to tax
3. Identifying expenses that are not deductible from gross income (tax nondeductible expenses)
4. Calculating the deferred tax expense (deferred tax)
5. Calculating the tax credits and tax losses that can be compensated
6. Calculating the Income Tax less (more) paid
7. Calculating Tax Article 25 for the current year
8. Preparing files for import process data to the e-SPT application

Course Schedule:

Tuesday - Wednesday,
17 – 18 January 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

Our talented team, worldwide and updated knowledge, followed by unwavering commitment to quality services will help you build strong compliance.



A. Tax Compliance and Assurance Series

2. Practical Course - Tax Accounting and Fiscal Reconciliation

At the end of the year company must commercially prepare financial statements commercially for the purposes of taxation. These adjustments arise due to the differences in the recognition of income and expense in a given period (fiscal year) between the recognition of revenue based on IAS and recognition of revenue based tax legislation. IAS only provides guidance in preparing the financial statements of commercial and does not specifically prescribe the accounting treatment related to the tax legislation. Thus, came the fiscal reconciliation to the financial statements of commercial for tax purposes. Fiscal reconciliation is performed by taxpayers because there are differences in the calculation, in particular the accounting profit with the profit according to the tax.

Commercial or business financial report is intended to assess the economic performance and financial condition of private sector, while the financial statements of the fiscal is intended to calculate tax. For commercial or business interests, the financial statements are prepared based on IAS, whereas for the sake of fiscal, financial statements are prepared based on tax regulations. The second difference is that the basis of preparation of the financial statements results in the computation difference of earnings (loss) of an entity.

This course will provide an understanding of the Tax Accounting and appropriate steps in fiscal reconciliation and how to optimize the company's ability to achieve the company's strategic goals.

Topics Covered:

1. Tax Accounting
 - General Principles of Tax Accounting
 - Application of Tax Accounting on general cost, depreciation, foreign exchange, and leasing
 - Fiscal Financial Statements
 - Financial Statements and Users
2. Fiscal Reconciliation
 - Types of Fiscal Correction
 - Fiscal Reconciliation Techniques
 - Case study

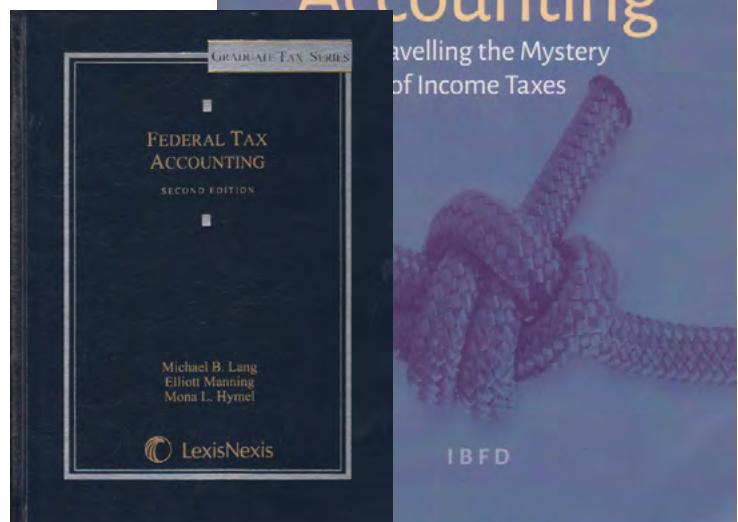
Course Schedule:

Tuesday, 24 January 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR1.500.000,-

We will provide an understanding of the tax accounting and appropriate steps in fiscal reconciliation, and how to optimize the company's ability to achieve the its strategic goals.



A. Tax Compliance and Assurance Series

3. Practical Course - Tax Diagnostic Review & Due Diligence

Tax diagnostic review and due diligence are the processes by which some or all tax affairs of a company or business are independently reviewed in connection with a transaction to identify tax risk and/or benefits inherent in the company or business and/or to establish particular facts or circumstances with regard to its tax position.

Tax diagnostic review and due diligence, of course, can be performed in any circumstances where the knowledge of a company's or business's tax position is required. But as the term is generally understood, and a the above definition suggests, tax diagnostic review and due diligence is normally performed:

- in the context of transaction;
- with a third party;
- in which one party will directly or indirectly assume liability for, or the benefit of, or otherwise be affected by, some aspect of the tax history of a target company or business.

Topics Covered:

1. The principal types of tax diagnostic review and due diligence
2. The tax diagnostic review and due diligence process
3. Defining the scope of tax diagnostic review and due diligence
4. Reporting tax diagnostic review and due diligence findings
5. Tax due diligence: Implication for the contract
6. Dealing with specific area

In whatever context it is performed, tax diagnostic review and due diligence should not merely be a fact-finding exercise. Facts without interpretation are of limited value. Users of tax diagnostic review and due diligence require guidance on the implications of those facts and how to address those implications in the context of a particular transaction. Above all, tax diagnostic review and due diligence serve a commercial purpose. It should help the person who commissioned it to make the commercial decisions critical to a transaction, in particular whether or not to complete the transaction either in its entirety or even at all, how to complete the transaction in question, at what price, and what terms.

Considering the significance of tax diagnostic review and due diligence, this course will provide you with understanding and practical guidance on it.

Course Schedule:

Tuesday, 10 May 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR2.000.000,-

The main objective of tax diagnostic review and due diligence is to determine the past, present, and future tax liabilities.



B. Tax Policy Training Series

1. Seminar - Tax Policy and Administration Course

Taxation (policy and administration) in developing countries has been a concern for many researchers and received much attention because of its various dimensions. The first dimension is taxation plays a key role in state building via two channels. On one hand, taxation can build fiscal contract that may bring a representative democracy, and as the main source of revenue to strengthening state capacity on the other. Second, after the 2008 crisis, many governments reformed their tax system and policies. Lastly, dimension of effort to finance development in order to fulfil any multilateral agreements, such as Doha Conference or Sustainable Development Goals (SDGs).

Topics Covered:

1. Fundamental perspectives of tax system
2. Resource mobilization and policy dilemma
3. Overview and trends in direct taxation
4. Overview and trends in indirect taxation
5. Tax administration: comparative study
6. Tax compliance and taxing the hard to tax sector
7. Estimating tax potential revenue and targeting
8. Political economy of tax reform
9. Recent issues in Indonesian taxation

However, in Indonesia setting, several questions still remain. How good (or bad) was the tax revenue performance in Indonesia? Concerning its political, social, demographic, and economic status, how much could tax potential tax revenue be achieved? What major improvements need to be implemented in tax policy and tax administration? In order to answer these questions, we explore the theory, international best practice, trends and empirical studies from various countries.

Course Schedule:

Thursday, 27 April 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR2.000.000,-

The first dimension is taxation plays the key important role in state building via two channels.



B. Tax Policy Training Series

2. Seminar - Fiscal Decentralization and Local Tax Management Course

After more than 15 years of implementation of the fiscal decentralization in Indonesia, it is still difficult to judge whether the process is a successful one or not. Most of the second and third tier of the government (provinces and municipals), are now still struggling to increase their local tax revenue while at the same time are largely dependent on central government transfer. However, decentralization framework embarked upon without a clear consensus on the institutional and system required to guide the basic design of local tax policy and administration.

This course is specifically designed for those who are interested in expanding their knowledge of theory and practice of local public finance. Further,

the course contents will explore the challenges and opportunities for local government to mobilize their revenue in fiscal decentralization context. The course considers fiscal decentralization from two angles: the optimal sharing of responsibilities and/or optimal of local government capacity to collect taxes. Apart from these theoretical approaches we also analyze from a comparative perspective the actual management local tax work in the world. The contents of this course will support government officials to setup their policy agenda and priority.

Topics Covered:

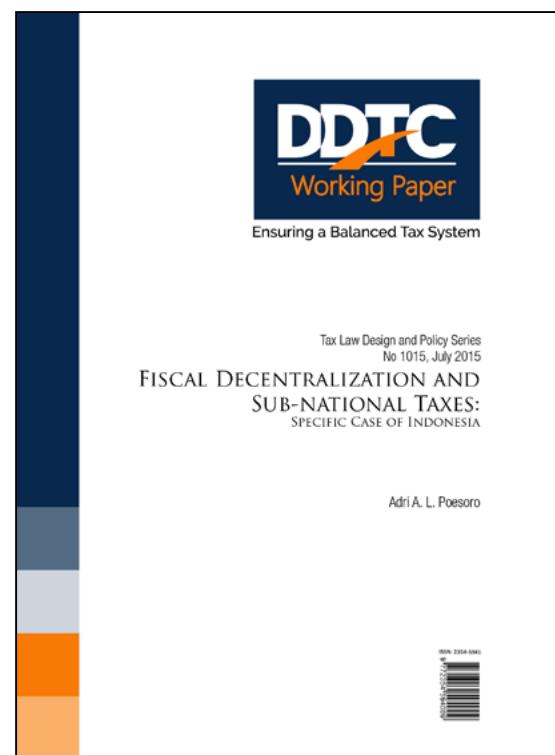
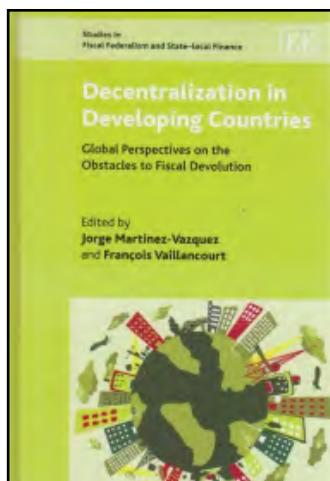
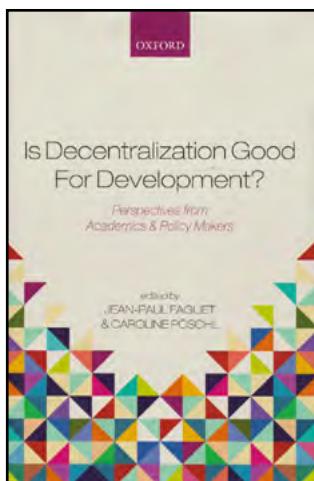
1. Fiscal Decentralization Framework
2. Local Tax in the Economic Competitiveness Context
3. Trend and Comparative Perspective
4. Budgeting and Revenue Forecasting
5. Local Tax Administration System and Compliance
6. Tax Law Design
7. Site Visit/ Local Public Finance Management
8. Intergovernmental Fiscal Relations

Course Schedule:

Tuesday, 2 May 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR2.000.000,-



Our books and Working Paper about Fiscal Decentralization

B. Tax Policy Training Series

3. Seminar - International Tax Policy

The interdependency of the world economy marked by global value chain and free movement of products and production input has brought more concern on international aspect of public finance. Tax policy is extended from domestic to global, from national to international. Nevertheless, this does not immediately translate to the existence of a single tax system. It is merely concerned that any country's tax policy could not be seen as isolated expanse as it also affected other countries, and vice versa.

In global economy, when capital and labor are mobile, countries are dealing with questions on how to set taxation for non-residents income and taxation for residents who generate income abroad. Since tax sovereignty is limited to domestic economic activities,

tax on cross-border activity should also be allocated between countries. With regards to tax sovereignty and national interest (revenue), each country will choose the best system to tax them. On the other hand, to achieve competitiveness, almost all countries have tried to reduce their statutory tax rate, while some of them also behave as fiscal paradise (tax havens). The interaction between national tax systems creates a tax distortionary effect, since there are possibilities to over taxation (double taxation) and under taxation (double non-taxation).

This course will explore normative and pragmatic 'international' tax policy for Indonesia to meet their revenue target, competitiveness, and at the same time in line with international best practices.

Topics Covered:

1. Globalization and International Tax System
2. Tax Competition and Tax Law Market
3. Tax Treaty Policy
4. Anti-Avoidance Rules
5. Cross Border Financial Market and Tax Evasion
6. Empirical Study on International Tax Policy
7. International VAT System
8. Global Tax Cooperation and Future Landscape

Course Schedule:

Tuesday, 7 November 2017 (09.00 a.m.–05.00 p.m.)

Investment:

IDR2.000.000,-



Tax policy is extended from domestic to global, from national to international. Nevertheless, this does not immediately translate to the existence of a single tax system.

C. Dispute Resolution Series

1. Seminar - Updating Procedure of Tax Audit and Dispute Resolution

Taxpayers frequently experience underpayment assessment as audit result, while their tax return requests for refund of overpayment. In addition, during the audit process, the Directorate of General Taxes (DGT) frequently requests for boxes of documents while at the end of the process, the documents never become a part of their consideration resulting in the underpayment assessment.

Further, in the objection level, it is hard not to say that the results would frequently be the same as in the audit process. Again, the position of the taxpayers has been frequently unfavorable.

Topics Covered:

1. Update basic rules for tax audit
2. Comprehension of tax audit methods utilized by the DGT
3. Information and documentation management
4. Taxpayer rights management
5. Special tax audit
6. Amplification of contra-argumentation of DGT standing
7. Strategy of the case presented before the court

The taxpayers may assess their right to take the disputes to appeal level. However, time and resources consumption in the process sometimes decreases the taxpayers' assurance, not including the uncertain results.

This course is designed to discuss all the matters of audit, objection and appeal process and their types of burden as being elucidated above. The course would also provide the strategy to ensure the taxpayers' position in the disputes and how to prevent potential disputes since the very beginning of the process.

Course Schedule:

Tuesday, 9 May 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

Dispute resolutions and negotiations generally involve face-to-face interactions with tax authority.



C. Dispute Resolution Series

2. Practical Course - Withholding Tax, VAT, and Corporate Income Tax Dispute Resolution

The perceived difference in interpreting tax regulations between taxpayers and tax authority can cause problems if the way to settlement is not found and finally a tax dispute arises. Due to the pace of settlement, the Government has provided the means to resolve tax disputes, both at the level of objection and at the level of the tax court.

Knowledge about strategies to resolve tax disputes is essential. However, the preparation of this strategy requires a clear understanding of the dispute as well as considerable experience in the field. Experience is required in tax disputes experienced by a taxpayer which may also be experienced by other taxpayers, so knowledge about chances of successful completion of

such disputes is very important for taxpayers. Thus, taxpayers can sort and assess which disputes have successful completion and which do not, so that the strategy can be in high accordance with the target.

The objective of this course is to provide a clear understanding of how to resolve withholding tax, VAT, and Corporate Income Tax based on the experience of instructors. In this course, participants will be given an overview of the mapping dispute where participants can see what is often disputed in withholding tax, VAT, and Corporate Income Tax. In addition, participants will also be invited to sense how to resolve a real tax dispute through moot court.

Topics Covered:

1. Identification and anticipation withholding tax issues
2. Mapping withholding tax dispute based on real case (at the level of objection and the tax court)
3. Withholding tax dispute resolution
4. Overview: Selected issues in VAT
5. Mapping VAT disputes based on real case (at the level of objection and the tax court)
6. VAT dispute resolution
7. Specific issues in Corporate Income Tax
8. Mapping Corporate Income Tax disputes based on real case (at the level of objection and the tax court)
9. Corporate Income Tax resolution
10. Moot court

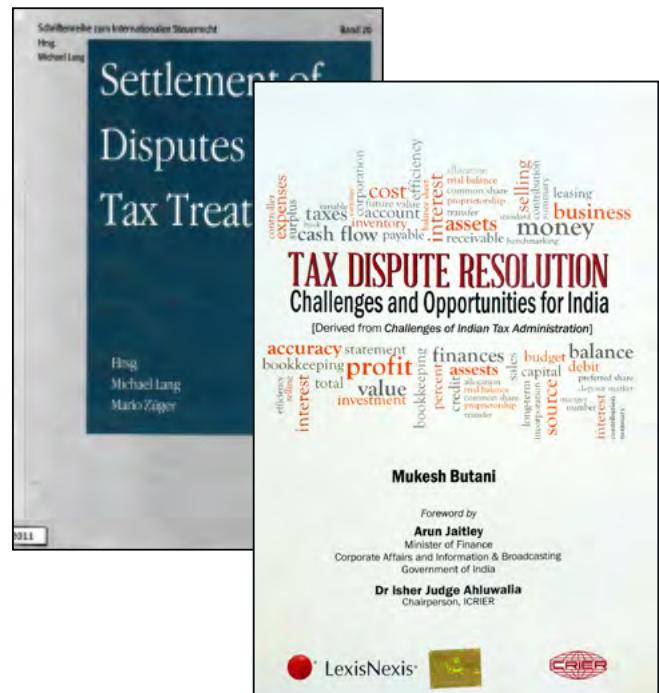
Course Schedule:

Tuesday - Wednesday,
16 - 17 Mei 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR4.000.000,-

Knowledge about strategies to resolve tax disputes is essential and knowledge about chances of successful completion of it, is very important for taxpayers.



C. Dispute Resolution Series

3. Practical Course - International Tax Dispute Resolution

International tax is one issue that is often debated among tax practitioners and tax authorities. Moreover, the differences in interpreting the provisions of the tax treaties between the taxpayer and the tax authorities as well as issues regarding the application of a tax treaty procedures are often the cause of international tax disputes in Indonesia. Even some of the major disputes included in the tax court are due to differences in interpretation of the provisions of the tax treaty.

Considering the magnitude of the impact that may arise from disputes regarding international tax, it is important to know the strategies and ways of its

solution. In addition, it is also important to know the trend of international tax disputes concerning what often happens and how to settle the dispute in court. Again, knowledge and experience become the important keys to understand it.

Therefore, through this course participants will be given an understanding and knowledge in formulating a strategy to resolve disputes regarding international tax using real cases which occur. Through this course, we will share our experience in resolving international tax disputes that we have faced.

Topics Covered:

1. Overview: International tax issues
2. Mapping international tax dispute based on real case (at the level of objection and the tax court)
3. International tax dispute resolution
4. Moot court

Course Schedule:

Tuesday, 11 July 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR2.000.000,-



D. Transfer Pricing Series

1. Practical Course - Transfer Pricing Documentation

In October 2015, the Organization for Economic Co-operation and Development (OECD), and the G20 finalized the report of Action Plan 13 on Base Erosion and Profit Shifting (BEPS). The main focus of this report is related to revision of standards for transfer pricing documentation as set out in Chapter 5 OECD Transfer Pricing Guidelines. Revisions to the standards for transfer pricing documentation are emphasized in the information transparency concerning the allocation of MNE profits, capital, and the substance of business activities in each jurisdiction where MNE operates.

Indonesia, as one of the G20 countries that support the BEPS project, also plans to adopt these latest

guidelines. At present, the rules regarding transfer pricing documentation in Indonesia are stipulated in DGT regulation No. PER-32/PJ/2011, in which amendments of this regulation are planned to be finalized in the near future.

DDTC Academy presents a two-day transfer pricing documentation practical course which not only aims to develop the technical knowledge regarding transfer pricing documentation, but also to help the participants obtain a better understanding implement and prepare the three tier transfer pricing documentation, as required by BEPS project.

Topics Covered:

1. Brief overview of Indonesian transfer pricing legislation
2. Practical case studies: examples of transactions that would be subject to be reviewed
3. Basic format of transfer pricing documentation based on current regulation in Indonesia (PER-32/PJ/2011)
4. Practical application of functional and risk analysis, including basic technique to gather relevant facts of the case
5. Applying transfer pricing methods
6. Benchmarking and use of comparable in support of pricing
7. Sources and selecting your comparables
8. Transfer pricing adjustments
9. Determining the arm's length outcome

Course Schedule:

Tuesday – Wednesday,
25 – 26 July 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR5.000.000,-

“Melalui *course* ini, saya dapat memahami *transfer pricing* lebih mendalam.”

-Soegito Permadi, Manager,
PT Charoen Pokphand Indonesia-



D. Transfer Pricing Series

2. Practical Course - Transfer Pricing Valuation

Comparability is at the heart of transfer pricing. The application of the arm's length principle relies on a comparison of the prices charged in controlled transactions with the prices charged in similar transactions between independent enterprises. Finding a comparable is challenging due to the lack of similar companies in the market and because comparable information may be incomplete, difficult to analyse or may not exist. In addition, most information in databases concerns developed countries and thus may not provide adequate solutions when determining a comparable for a transaction in an emerging economy or developing country.

This intermediate-level, interactive workshop is designed for participants who already have knowledge of transfer pricing but would like to gain a more in-depth comprehension of its valuation aspects. Participants will

receive guidance and/or assistance in the effective use of databases and other information.

The objective of the course is to introduce the participants to valuation principles and methodologies and to provide an understanding of the application of these principles. Following a brief introduction to the individual topics, the sessions are complemented with case studies that focus on specific transactions. Each session is practical and covers the application of the OECD Transfer Pricing Guidelines and its transfer pricing methods in practice.

The course is suitable for finance and tax personnel of multinational enterprises, tax accountants, economists and lawyers, in-house tax managers, tax and transfer pricing advisers, and government officials and tax officers.

Topics Covered:

1. Case study: internal and external comparables
2. Case study: comparability adjustments
3. Case study: interest rates for intercompany loans and fees for guarantees
4. Case study: valuation aspects of intangibles

Course Schedule:

Tuesday – Wednesday,
15 – 16 August 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR4.000.000,-

Finding a comparable
is challenging due
to a lack of similar
companies in a
market and because
comparable information
may be incomplete,
difficult to analyse or
may not exist.



D. Transfer Pricing Series

3. Seminar - Transfer Pricing Audit and Dispute Resolution Procedures (MAP & APA)

Currently, issues related transfer pricing are crucial among multinational companies. Various business expansions conducted by the majority of multinational companies will increase transactions with related parties. Furthermore, transaction with related parties will lead to disputes with Directorate General of Taxes (DGT) or tax authority counterparty related to the arm's length principle.

To face the disputes related to transfer pricing adjustments due to differences in the application of

an arm's length principle, several ways can be used by the taxpayer in order to solve the problem (dispute resolution), such as by applying Mutual Agreement Procedure/MAP, through Advance Pricing Agreement/APA, or appealing to the Tax Court until Judicial review to the Supreme Court.

This seminar will focus on the dispute resolution using the MAP and APA.

Topics Covered:

1. Overview of the MAP and APA procedures related to Indonesian Tax regulations and tax treaty
2. Understanding and managing the MAP and APA application process in Indonesia
3. The advantages and disadvantages of a MAP and APA, and issues that may arise

Course Schedule:

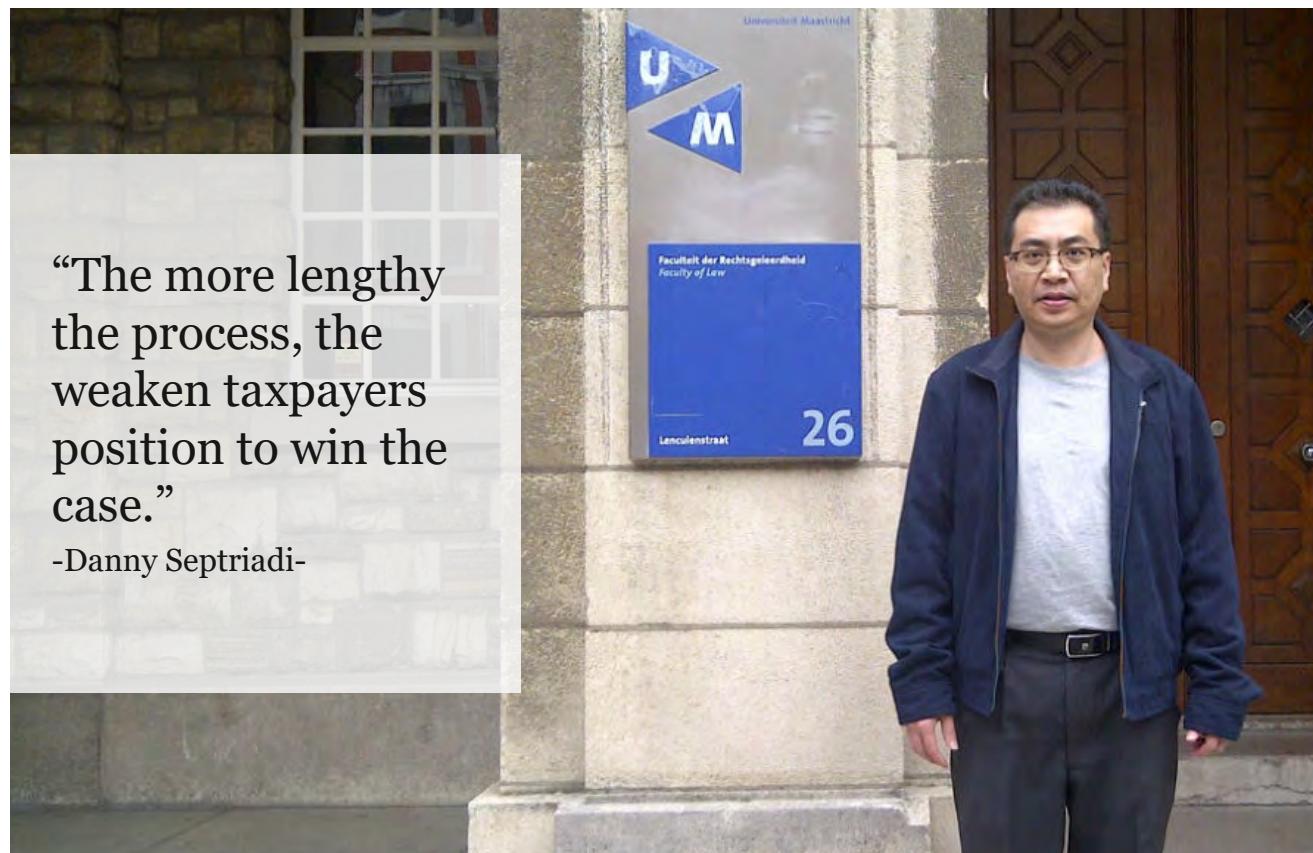
Thursday, 24 August 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR3.000.000,-

“The more lengthy the process, the weaken taxpayers position to win the case.”

-Danny Septriadi-



D. Transfer Pricing Series

4. Practical Course - Transfer Pricing Audit and Case Law

Transfer pricing (TP) has been noted by the Directorate General of Taxes (DGT) as a specific area where enforcement is increased for compliance purpose. In recent years, DGT has issued several tax regulations concerning transfer pricing, and the pinnacle is the transfer pricing audit standard governed in DGT regulation No. PER-22/PJ/2013 (TP Audit Standard) and its implementing instruction for tax auditors set out in DGT Circular Letter No. SE-50/PJ/2013 (Auditor's TP Audit Manual).

TP Audit Standard confirms the application of arm's length principle accordingly with international best practices, and covers almost every complex transaction including:

1. Intra-group services
2. Use or transfer of intangible property
3. Intra-group financing

TP Audit Standard also introduces other transfer pricing methodologies to be implemented on the use or transfer of intangible property, namely income based approach, cost based approach, and market based approach. It also increases the coverage area of information to the affiliated parties of relevant supply chain. In addition to the new features above, the Auditor's TP Audit Manual also introduces the use of secret comparables in TP analysis.

Prior to TP Audit Standard and Auditor's TP Audit Manual, DGT had ruled out 'Application of Arm's Length Principle Rules' set out in DGT regulation No. PER-43/PJ/2010 (issued on 6 September 2010) last amended by PER-32/PJ/2011 (issued on 11 November 2011). The Application of Arm's Length Principle Rules also confirms the application of arm's length principle based on international best practices, and includes also 'Cost Contribution Agreements' besides the above mentioned complex transaction as area of application.

Topics Covered:

1. The Application of Arm's Length Principle Rules (PER-43 and PER-32)
2. How to manage flow of information to substantiate the affiliated transactions
3. Relating the Indonesian Transfer Pricing Rules to the International Best Practices?
4. How TP international best practices can be helpful in defending your TP positions
5. The view of tax auditors or tax court judges concerning International Best TP Practices
6. In cross-border transaction, how to relate Transfer Pricing rules with International Tax rules?
7. Where to settle the dispute, tax audit stage, 'mutual agreement procedure', objection,

appeal, or even civil review, and what is the likelihood of success in each of those stages?

8. In the end, how to manage transfer pricing audit and defend your company's transfer pricing tax position?

Course Schedule:

Tuesday – Wednesday,
5 – 6 September 2017 (09.00 a.m. – 05.00 p.m.)

Investment:

IDR4.000.000,-

“...in the financial analysis, transfer pricing is a largely a question of facts and circumstances coupled with a high dose of common sense...”

-Justin Hogan-

Training Series Program

The series are delivered by DDTC Academy specialist lecturers whose reputation in this field has been recognized by many parties. Tax Policy Series are specially supported by national experts (guest lecturers) in this field.



1. Participant can join in one or more than one topic in the same or different series;
2. We offer special price for participants that enroll in all topics in the same series (bundling price);
3. We also offer a private group program that requires a minimum of 10 participants under reservation procedure and notification at least two weeks before;
4. For Tax Policy Training series, we can also provide the hotel accommodation and arrange transportation from airport to hotel with our negotiated special rates with Harris Hotel Kelapa Gading-North Jakarta.



In-House Training

We provide tax knowledge elevating training that supported by tremendous academic taste.



Nowadays, business environment is getting more complex. Multinationals/local companies are dealing with and being influenced by numerous new business models, tax laws, digital economy, and international/local politics in order to reach a responsible level of taxation and escalate quality of the company to the next level. These would consume companies' resources (human resources, cost, etc.), while at the same time shareholder needs to be promised of company growth. In order to improve company growth, tax system needs to be observed further, thus company can avoid unnecessary mistakes and comply with the tax law.

As per our understanding on the condition mentioned, we formulate three core questions that critical to the business and tax development:

- How complex are the tax regimes in Indonesia?
- How consistently are the laws and regulations applied?
- How predictable are such laws and their enforcement?

Through our trusted experts and progressive resources & knowledge, we provide the most comprehensive in-house training which has more personal approach to meet your organization needs. Our in-house training is provided to mitigate the taxation risk and its impact which might jeopardize your business operations.

We try to emphasize the multidisciplinary nature and draw from the fields of taxation, economics, accounting framework, business management and law to provide the participants with the basic knowledge required to understand advanced tax problems in your corporation.

In-House Training

Objective

- Tax function in your corporation will have excellent understanding about the significance and fundamental concept of taxation, both of Indonesian perspective or international perspective;
- With comprehensive of discussion case by case, all tax functions will be prepared for issues rising in the area of tax matters as their routine job;
- All tax functions will be prepared when facing audit performed by the DGT and have a sense of resolution when facing double taxation's dispute.

Some of our tailored In-house topics but not limited to:

A. Transfer Pricing

Basic Framework and Trends in Transfer Pricing

Arm's Length Principle, and Functional Analysis
Comparability and Measurement of Arm's Length
Transfer Pricing Method

Intermediate

Transfer Pricing of Intangible
Intra Group Services Transaction
Intra Group Financing
Transfer Pricing for Branches and Permanent Establishment
Transfer Pricing Risk Management
Transfer Pricing Aspect of International Tax Planning

Special Workshop

Transfer Pricing Documentation
Compliance Issues and Dispute Resolutions

B. International Taxation

Introductory

Basic Principle of International Tax Law
Comprehensive Feature of Industry and Relationship between Income Tax and Tax Treaties
Legal Status of The Contract in The Context of The Tax Law

Introductory or Intermediate

Tax Treaty Interpretation
Permanent Establishment Concept
Passive Income and Capital Gain
Conflict of Income Characterization for Treaty Purposes and Examples of Case Law
Taxation of Expatriate Employees
Beneficial Ownership and International Tax Avoidance
Transfer Pricing Documentation
Compliance Issues and Dispute Resolutions

In-House Training

C. Corporate Income Tax (CIT)

Introductory

- Taxable and Non-Taxable Subject of CIT
- Special Relationship in the Context of CIT
- Calculation of Taxable Base and Tax Rate
- Application of Final WHT under Government Regulation PP 46/2013
- Case Study on Taxable Subject and Object of CIT

Intermediate

- Fiscal Adjustment
- Calculation Annual Tax Due and Tax Credit of CIT
- Annual Tax Return of CIT and e-SPT 1771
- Tax Risk Mitigation of CIT

D. Withholding Tax (WHT)

Introductory

- Introduction to Taxable Subject and Tax Object of WHT Art. 22, 23, 26, Art. 4 Paragraph 2, and Art. 15
- Exemption of WHT Art. 22, 23, 26, Art. 4 Paragraph 2, and Art. 15

Intermediate: Analysis in Practice

- Withholding Tax of Article 22 (WHT Art. 22)
- Withholding Tax of Article 23 (WHT Art. 23)
- Withholding Tax of Article 26 (WHT Art. 26)
- Withholding Tax of Article 4 Paragraph (2) (WHT Art. 4(2))
- Withholding Tax of Article 15 (WHT Art. 15)

E. Value Added Tax (VAT)

Introductory

- Basic Concepts of VAT
- VAT Mechanism
- Subject and Object of VAT
- Place and Timing of VAT Payable
- Administrative Procedure of VAT

Intermediate

- VAT Invoice and Return Bill
- Mechanism of Creditable Input of VAT Invoice
- VAT Collector
- Restitution Procedure

In-House Training

F. Specific Tax Topics

Strengthening Tax Risk Management and Audit Strategy

Tax Control Framework
Identify Tax Risks on the Performance Financial
Tax Risk Management and Corporate Taxpayer
Illustrations and Case Studies
Mapping Current Tax Risk: Global And Domestic

Tax Aspects on Holding Company

Tax Exposure of Holding Companies
VAT Law of Art. 16D

International Taxation of Oil and Gas Industries

Comprehensive Features of the Industry
Relationship Between Income Tax of Domestic Law and Tax Treaties
Characterization of Income for Treaty Purposes and Examples of Case Law
Taxation of Expatriate Employees
Transfer Pricing Issues in The Gas Industry
Cost Recovery for Gas Industry

Tax Incentives

Fundamental Concepts Tax Incentives
Incentive on Income Tax
Incentive on Withholding Income Tax
Incentives on Value Added Tax
Customs and Excise

Tax Policy and Tax Monitoring

Development and Current Tax Issues in Indonesia
Identification of Taxpayer Rights and Obligations
Policies to Expand and Compliance Simplification
Tax Intensification of Economic Sector in the Field of Natural Resources and Agriculture
Special Examination for Taxpayers Strategic and Implementation Model Compliance Risk Management (CRM)
Implications Action Plan Base Erosion and Profit Shifting (BEPS) against Indonesian Domestic Tax Regulations

G. Local Tax

Introductory and Intermediate

Overview of Local Tax
Implementation of Local Taxing Empowerment
Issues Arising and Strip Tax Collection
Local Tax Dispute Resolution Process

In-house Training

Some of Our Training Participants and In-house Training:



Calendar



Intensive Course



Practical Course
/ Workshop



Seminar



Click the date for more details

January

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

17 - 18 : Preparation and Calculation of Corporate Income Tax 2016

24 : Tax Accounting & Fiscal Reconciliation

February

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28				

2 : Tax Compliance Post-Tax Amnesty

9 : Domestic and International Corporate Tax Planning

21 - 22 : Legal Proceedings in the Tax Court

March

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

4-15 Apr : Transfer Pricing Course - Executive Class (Batch 12)

7 : Updating FATCA and AEOI

14 : Advanced Indonesian Value Added Tax (VAT) - Selected Issues

21 : Taxation of Business & Investment Activities (Batch 1)

April

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

4 : Taxation for Business & Investment Activities (Batch 2)

13 : Recent Development and Emerging Issues of Oil & Gas Taxation

18 : Connection between Transfer Pricing, Custom Valuation, & Voluntary Declaration

27 : Tax Policy and Administration

Calendar



Intensive Course



Practical Course
/ Workshop



Seminar



Click the date for more details

May

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				2	3	4
1					5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

- 2 : Fiscal Decentralization and Local Tax Management
- 4 : Taxation on Shipping and Aircraft
- 9 : Updating Procedure of Tax Audit and Dispute Resolution
- 10 : Tax Diagnostic Review and Due Diligence
- 16 - 17 : Withholding Tax, VAT, and Corporate Income Tax Dispute Resolution

June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
4					3	
				5	6	7
			7	8	9	10
11			12	13	14	15
18			19	20	21	22
25			26	27	28	29
					30	

July

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

- 11 : International Tax Dispute Resolution
- 15 Jul - : Transfer Pricing Course - Executive Class (Batch 13)
- 26 Aug & Tax Treaty Interpretation and Application Course - Executive Class (Batch 5)
- 18 : International Tax Structuring for Real Estate and Immovable Property Investments
- 25 - 26 : Transfer Pricing Documentation

August

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
				4	5	
6		7	8	9	10	11
13		14	15	16	17	18
20		21	22	23	24	25
27		28	29	30	31	

- 8 : Taxation for Business and Investment Activities (Batch 3)
- 15 - 16 : Transfer Pricing Valuation
- 24 : Transfer Pricing Audit and Dispute Resolution Procedures (MAP & APA)

Calendar



Intensive Course



Practical Course
/ Workshop



Seminar



Click the date for more details

September

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

- 5 - 6 : Transfer Pricing Audit and Case Law
 9 - 21 : Tax Treaty Interpretation and Application Course - Oct Executive Class (Batch 6)
 19 : Taxation on Digital Economy and E-Commerce

October

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

- 10 : Taxation of Intercompany Financing
 24 : Taxation on Professional Income
 28 - 9 : Transfer Pricing Course - Executive Class (Batch 14)
 Dec

November

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

- 7 : International Tax Policy
 14 : Transfer Pricing post BEPS-OECD/G20

December

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

Program Discount



15% discount will be given if the fee has been paid at least 20 days before the starting date of the training.



All participants of DDTC Academy will get "Kartu Peserta Training". Get 20% discount to subscribe to the next training programs and valid until December 2017. (for only 3 (three) more training programs).



Only one discount is available at the time the registration is made.

Registration Procedures

- Registration can be done at DDTC Academy in person or by telephone, letter, e-mail or fax, Monday - Friday from 08.30 - 17.30;
- To participate in the DDTC Academy Program a participant-to be is expected to confirm no later than 1 (one) week before the training commences;
- The fees indicated for each training program covers updated hardcopy material, course kit, certificate, snack, coffee break and meals.

Method of Payment:

Direct payment to DDTC Academy or by Bank Transfer to:

Bank Central Asia (BCA) - KCP Ruko Artha Gading

Acct No: 8400031020 (IDR)

Acct Name: PT DIMENSI INTERNASIONAL TAX

(Please send the copy of bank transfer form to us by email: eny@ddtc.co.id or by fax to (021) 29385759).

Contact / Information



DDTC Academy:

 Menara Satu Sentra Kelapa Gading, 5th Floor, Unit #0501
Jl. Bulevar Kelapa Gading LA3 No. 1
Jakarta Utara 14240, Indonesia
P: +622129385758 | F: +622129385759

For more information regarding administrative policies, or for further assistance, please contact:

Eny Marliana
 Mobile: +628158980228
 Email: eny@ddtc.co.id

Ana Lailatul
 Mobile: +6282114239142
 Email: ana_lailatul@ddtc.co.id

Follow our social media for up to date information about all training programs:

 Be our subscriber:
www.ddtc.co.id
 Like our fanpage:
DDTC Indonesia

 Follow our twitter:
@DDTCIndonesia
 Follow our linkedin:
DDTC

 Follow our instagram:
@DDTCIndonesia

Lecturers Profile



DARUSSALAM

DARUSSALAM is the Managing Partner of DDTC. His main focus in academic are tax planning and international tax. Currently, he is also the Vice President at Indonesian International Tax Society (IITS), the Head of Research and Development at Indonesian Taxpayers Association, and at Indonesian Fiscal Association. He is also the Head of Tax Development, Tax Accountant Compartment, the Indonesian Institute of Accountant (IAI).

He is a respected member of Tax Revenue Optimization Steering Committee. He is acknowledged as a tax expert witness in various tax cases at the District Court, the Corruption Court and the Constitutional Court. In addition, he recently has been chosen as 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 was titled

"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. Darussalam is the author of several books (5 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, the University of Indonesia, Brawijaya University, Gadjah Mada University, Parahyangan Catholic University, Tarumanagara University, Trisakti University, Petra Christian University, Bina Nusantara University, Christian University of Indonesia, Sebelas Maret University).

Lecturers Profile



DANNY SEPRIADI

DANNY SEPRIADI is the Senior Partner of DDTC and a lecturer at Graduate Program in Tax Policy and Administration Science at Master in Accounting Program at the University of Indonesia. His main research areas are international tax 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. Further, he is acknowledged as an expert witness in transfer pricing disputes at Indonesian Tax Court.

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.

He was selected as one of the World's Leading Transfer Pricing Advisers 2015 by Expert Guides. He 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.

Danny Sepriadi has published several books and numerous articles on transfer pricing and international taxation. He is a source for print media (Kompas, Bisnis Indonesia, Kontan and Republika), 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, Indonesian Tax Consultants Association, University of Indonesia, Bina Nusantara University, Tarumanagara University and so forth).

Lecturers Profile



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.

Lecturers Profile



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.

Lecturers Profile



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), 21st 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.

Lecturers Profile



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

Lecturers Profile

"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.



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.

Lecturers Profile



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.

Lecturers Profile



R. HERJUNO WAHYU AJI

R. HERJUNO WAHYU AJI is the Senior Manager of Tax Compliance and Litigation Services at DDTC. He is responsible for Tax Advisory and Compliance Services for multinational companies including those engaged in automotive industry, mining and poultry feed industry. He is also responsible for Tax Dispute and Litigation Strategies.

Prior to joining DDTC, he was an Account Representative at Directorate General of Taxes (DGT).

He received his Master's degree in Accounting from the University of Indonesia.

He has completed certificate B of Indonesian Tax Consultant Examination and has been licensed to practice as registered tax consultant. In 2010, he attended a course on "Statement of Financial Accounting Standard No. 50 and 55", held by DGT (2010). In 2013, he attended a course on "International Taxation of Oil and Gas and other Mining Activities", held by IBFD, Singapore. In June 2014, he attended GREIT Lisbon Summer Course "Tax Good Governance and The BEPS Action Plan", held by IDEFF, Portugal. In 2015, he attended "International Tax Aspects of Mergers, Acquisitions and Corporate Finance", held by IBFD, Amsterdam.

He is also frequently involved as a trainer, lecturer or speaker in several tax trainings and seminars held by private institutions, government institutions, and universities including Petra University, Trisakti University, Kalbe Group, 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

Lecturers Profile

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.



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.

She received her Bachelor's degree in Fiscal Administration from the University of Indonesia, and currently she is pursuing her Master's degree in Strategic Management at Gadjah Mada 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 Programme" held by the Universidade Católica Portuguesa, in Lisbon, Portugal. On October 10 – 14, 2016 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.

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.

Lecturers Profile



VERONICA KUSUMARDANI

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.



RINAN AUVI METALLY

RINAN AUVI METALLY is the Assistant Manager of Tax Compliance and Litigation Services at DDTC. Her expertise focuses on Tax Advisory and Tax Compliance

services for several multinational companies including those engaged in heavy equipment industry, coal mining industry, and leather manufacturer industry. She received her Bachelor's degree in Fiscal Administration with cum laude from the University of Indonesia.

In 2011, she attended a course on "Principles of International Taxation", held by IBFD, in Kuala Lumpur, Malaysia. In 2012, she attended a course on "Practical Aspects of International Tax Planning", held by IBFD, in Kuala Lumpur, Malaysia. She is a trainer, lecturer or speaker in several tax trainings or seminars, held by private institutions and universities, including the Fiscal Administration Study Group of the University of Indonesia.

Lecturers Profile



KHISI ARMAYA DHORA

KHISI ARMAYA DHORA is the Assistant Manager of Tax Premier Controversy Services at DDTC. She is particularly involved in tax advisory projects, where she has received outstanding feedback from clients and peers alike for providing noteworthy tax advises. She has represented several multinational companies in dispute resolution procedures, including tax objection, tax appeal, lawsuits and litigation in the tax court.

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

In 2012, she attended a course on "Principles of International Taxation", held by IBFD, Kuala Lumpur, Malaysia. In June 2013, she attended "Summer School of Value Added Tax Programme", held by the Universidade Católica Portuguesa, Lisbon, Portugal. In September – December 2015, she attended "ITC Leiden SEA Executive Program in International Tax Laws", held by Leiden University's Tax Center and the Malaysian Tax Academy, Malaysia.

She has completed certificate A of Indonesian Tax Consultant Examination 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 a lecturer on International Taxation at Bachelor in Administration (Taxation) at the Sekolah Tinggi Ilmu Administrasi Mandala Indonesia (STIAMI) and she is also involved as a trainer or speaker in tax training or seminar, held by DDTC and PAMA Persada Nusantara.



WULAN CLARA KARTINI

WULAN CLARA KARTINI is the Senior Specialist of Tax Compliance and Litigation Services at DDTC. She is particularly involved in tax advisory projects. She

has represented several multinational companies in dispute resolution procedures, including tax objection, tax appeal, lawsuits and litigation at the tax court. She is also a regular speaker in topics regarding domestic Indonesian tax in seminars, training, and group discussions held by DDTC.

She received her Bachelor's degree in Fiscal Administration from the University of Indonesia and is pursuing her Master's degree in Accounting at the University of Indonesia, under scholarship from DDTC.

In 2014, she passed the exam of Ujian Sertifikasi Konsultan Pajak (USKP) A, organized by Indonesian Tax Consulting Association (IKPI). She holds a license to practice as tax attorney by Tax Court.

Lecturers Profile



PUPUT BAYU WIBOWO

PUPUT BAYU WIBOWO is the Senior Specialist of Tax Compliance and Litigation Services at DDTC. His expertise focuses on diagnostic tax review,

tax advisory and tax compliance for multinational companies. He is also involved in tax audit, tax objection and tax litigation at the tax court for clients in various industries, such as automotive, heavy equipment, cigarettes, transportation, and coal mining industry.

He received his Diploma's Degree in Tax Administration from the University of Diponegoro and pursuing his Bachelor's degree in Faculty of Economics, the University of Trisakti.

In 2013, he is attended a regular course on "Transfer Pricing" and "International Taxation" held by DDTC. In 2015, he is attended "BEPS Conference" held by Foundation for International Taxation in Mumbai, India.



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 natural ingredients, and coal mining industry. Subsequently, she has also been involved in transfer pricing advisory, audit defense and litigation services

She received her Diploma degree in Tax Administration from the University of Indonesia and her Bachelor's degree in Economics at the same university, under scholarship from DDTC.

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.

Lecturers Profile



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.



FLOURESYA LOUSHA

FLOURESYA LOUSHA 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, coal, automotive, pulp and paper,

chemicals, plastics and natural ingredients. Subsequently, she has also been involved in transfer pricing advisory, audit defense and litigation services.

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.

Lecturers Profile



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.



FAKRY

FAKRY is the Senior Specialist of Tax Compliance & Litigation Services at DDTc. His expertise is on

Corporate Income Tax (CIT) and preparation of CIT Return for various industries. He has also been involved in tax compliance, tax advisory, tax audit, tax objection, tax litigation (appeal & lawsuit) in the tax court, and tax judicial review in the supreme court for clients in various industries, such as automotive, heavy equipment, cigarette, pharmacy, and coal mining industry.

He received his diploma's degree Finance and Banking Majority in Accounting from the State Polytechnic of Jakarta (PNJ) and he received his Bachelor's degree in Accounting from the Indonesian College of Economics.

In 2013, he attended a regular course on "Transfer Pricing" held by DDTc.

Lecturers Profile



ANISA NURPRATIWI

ANISA NURPRATIWI is the Specialist of Tax Compliance & Litigation Services at DDTC. She has been involved in various projects such as, tax

compliance, tax advisory, tax audit and dispute resolution procedures, including tax objection and tax litigation (appeal) in the tax court for several companies. She has also filed in a Corporate Income Tax Return (CITR) for various industries and a preparation Individual Income Tax Return (IITR) for individual taxpayers.

She received her Bachelor's Degree in Taxation from Brawijaya University.

In 2015, she attended a regular course on "Transfer Pricing" and a seminar on "OECD/G-20 BEPS Project: Outcomes and Implications" held by DDTC. She holds a license to practice as a tax attorney by the Tax Court.



IQBAL SAHID

IQBAL SAHID is the Specialist of Tax Compliance & Litigation Services at DDTC. He has represented various multinational companies in dispute resolution procedures, including tax objection, tax appeal, lawsuits and litigation at the tax court. Subsequently, he has also been involved in tax advisory and compliance services for several multinational companies.

He received his Bachelor's Degree in Taxation with cum laude from Brawijaya University.

In 2015, he attended a regular course on "Transfer Pricing" held by DDTC. He holds a license to practice as a tax attorney by the Tax Court. He is a lecturer on international taxation at Bachelor in Administration at STIAMI.

Lecturers Profile



YENI MULYANI

YENI MULYANI is the Senior International Tax Analyst of DDTC. Her Ph.D dissertation is focused on transfer pricing compliance in Indonesia.

She received a bachelor degree in Law from the University of Jenderal Soedirman, Indonesia, Master's degree (LL.M) in International Taxation from University of Leiden, The Netherlands, and Ph.D in International Transfer Pricing from University of South Wales, Australia.

She provides counsel services related to transfer pricing issues for multinational enterprises, including advice on transfer pricing dispute resolution through litigation, Mutual Agreement Procedure, and Advance Pricing Agreement. Further, with a strong academic background and extensive industry experience, Dr. Mulyani has substantial skill in the field of taxation research.

She has teaching experience in corporate international taxation at several Indonesian universities, including the Universities of Indonesia, Tarumanegara, Bina Nusantara, Trisakti, and University of Kristen Krida Wacana (UKRIDA). She has spoken at various seminars for tax officials, business persons, academic and law firm audiences in Indonesia, including Ministry of Finance, Asosiasi Fiskal Indonesia (AFI), DDTC, Deloitte Indonesia, Directorate General of Taxes (DGT), Republic of Korea Embassy, and so forth.

Further, she has attended training courses in international taxation and international forums meeting in Indonesia and overseas, including for the OECD, The Global Forum on Transparency and Exchange of Information, and others.



ADRI POESORO

ADRI POESORO is the Chief Economist at DDTC. His primary fields over the years are international money and finance, public finance, transfer pricing economics and industrial organization.

He received a bachelor degree in Economics from the University of Indonesia, Master's degree in Economics from University of Southern California, USA, and Ph.D in Economics from Claremont Graduate University in Claremont, California, USA. His dissertation specifically covered the monetary policy stance in East Asian countries before and after the Asian crisis using Bernanke and Mihov approach. He has also conducted several researches on fiscal decentralization in Indonesia, tax policy, transfer pricing and market analysis, military budget, as well as domestic trade during his entire academic and professional life.

He has worked in various national and international well-recognized institutions. He is a major contributor for various DDTC working papers. He is inaugurated as a lecturer at Master's Program of Planning and Public Policy (MPKP FEUI) with topic regarding applied econometrics. He is also involved as a trainer or speaker at University of Indonesia.



DDTC Academy:

Menara Satu Sentra Kelapa Gading, 5th Floor, Unit #0501
Jl. Bulevar Kelapa Gading LA3 No. 1
Jakarta Utara 14240, Indonesia

Phone: +62 21 2938 5758 | **Fax:** +62 21 2938 5759

ddtcacademy.co.id



Be our subscriber:
www.ddtc.co.id



Like our fanpage:
DDTC Indonesia



Follow our twitter:
@DDTCIndonesia



Follow our linkedin:
DDTC



Follow our instagram:
@DDTCIndonesia