

CURRICULUM VITAE - SENIOR PARTNER



FORMAL TAX EDUCATION:

- Master's Degree in **Tax Policy and Administration, University of Indonesia;**
- Master's Degree (LLM Int. Tax) in **International Taxation, Vienna University of Economics and Business Administration, Austria.**



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INTERNATIONAL TAX COURSES AND SEMINARS:

- **“Summer School of Transfer Pricing Programme”**, held by Universidade Católica Portuguesa, Lisbon, Portugal (2012).
- **“Advanced Course in Transfer Pricing”** held by Maastricht Centre for Taxation, Maastricht University, the Netherlands (2014).
- **“Transfer Pricing: Policy and Practice”** held by Duke Center International Development (DCID), Duke University, North Carolina, USA (2015).
- **“2nd International Conference on Taxpayers Rights”** held by WU (Vienna University of Economics and Business), Austria (2017).
- **“Value Chain Analysis - Functional Analysis post BEPS”** held by Maastricht University and TPA Global, the Netherlands (2017).

PROFESSIONAL LICENSES:

- Licensed Tax Attorney.

JOB TITLES:

- Senior Partner of DDTC.
- Vice Chairman of Tax Magazine “InsideTax”
- Lecturer at Master Accountancy, Faculty of Economics and Business University of Indonesia.
- Lecturer at Master Faculty of Social and Political Science University of Indonesia.

ACHIEVEMENTS:

- Selected as one of the World's Leading Transfer Pricing Advisers 2015-2017 by Expert Guides.
- Experience in Arbitration Disputes as an expert in London, United Kingdom.
- Expert witness of PT Kraft Indonesia, PT General Food Industries in Indonesian tax court.
- Source for print media (Bisnis Indonesia, Kontan, Kompas, Republika) and online media.

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PUBLICATION:

BOOKS

1. Darussalam and Danny Septriadi, **Membatasi Kekuasaan untuk Mengenakan Pajak: Tinjauan Akademis terhadap Kebijakan, Hukum, dan Administrasi Pajak di Indonesia**, (Grasindo, 2006).
2. John Hutagaol, Darussalam, and Danny Septriadi, **Kapita Selekt Perpajakan**, (Salemba Empat, 2006).
3. Darussalam and Danny Septriadi, **Cross-border Transfer Pricing untuk Tujuan Perpajakan**, (DDTC, 2008).
4. Darussalam, John Hutagaol, Danny Septriadi, **Konsep dan Aplikasi Perpajakan Internasional**, (DDTC, 2010).
5. Darussalam, Danny Septriadi and B. Bawono Kristiaji, **Transfer Pricing: Ide, Strategi, dan Panduan Praktis dalam Perspektif Pajak Internasional**, (DDTC, 2013).
6. Darussalam and Danny Septriadi, **Perjanjian Penghindaran Pajak Berganda: Panduan, Interpretasi, dan Aplikasi**, (DDTC, 2017).



ARTICLES

1. Darussalam and Danny Septriadi, “**Kerancuan dalam Perumusan Bentuk Usaha Tetap**,” *Indonesian Tax Review Magazine*, Volume IV, 16th edition (2005).
2. Darussalam and Danny Septriadi, “**Sistem Pemajakan atas Perseroan dan Orang Pribadi Sebagai Pemegang Sahamnya-Bagian I**,” *Indonesian Tax Review Magazine*, Volume IV, 19th edition (2005).
3. Darussalam and Danny Septriadi, “**Sistem Pemajakan atas Perseroan dan Orang Pribadi Sebagai Pemegang Sahamnya-Bagian II**,” *Indonesian Tax Review Magazine*, Volume IV, 20th edition (2005).
4. Darussalam and Danny Septriadi, “**Demokratisasi Pengesahan Perjanjian Penghindaran Pajak Indonesia (P3B) Indonesia**,” *Indonesian Taxation Journal*, ISSN 1414-05 18, Volume 4 No 10 (July 2005).
5. Darussalam and Danny Septriadi, “**Kedudukan Surat Keterangan Domisili dalam Menentukan Hak Mendapatkan Fasilitas P3B**,” *Indonesian Tax Review Magazine*, ISSN 14 12-1727, Volume IV, 48th edition (2005).
6. Darussalam and Danny Septriadi, “**Membatasi Kekuasaan untuk Mengenakan Pajak**,” *Bisnis Indonesia Newspaper*, Nov. 14, 2005.
7. Darussalam and Danny Septriadi, “**Upaya Menangkal Praktik Penghindaran Pajak**,” *Bisnis Indonesia Newspaper*, Dec. 12 2005.
8. Darussalam and Danny Septriadi, “**Sudah Jatuh Tertimpa Tangga**,” *Bisnis Indonesia Newspaper*, Dec. 26, 2005.
9. Darussalam and Danny Septriadi, “**Ketidakadilan Pemajakan Penghasilan Karyawan**,” *Bisnis Indonesia Newspaper*, Jan. 2 2006.
10. Darussalam and Danny Septriadi, “**Proses Legislasi UU Pajak, Bagaimana Seharusnya**,” *Bisnis Indonesia Newspaper*, Feb. 13, 2006.
11. Darussalam and Danny Septriadi, “**Constitutional Law 1945 & Taxation: A Proposal for Amendment**,” *The Proceedings of International Seminar on “Harmonious Society and Judicial Tax Reform*,” China, May 2006.

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12. Darussalam and Danny Septriadi, "**Tax Tribunal**," The Proceedings of International Seminar on "Harmonious Society and Judicial Tax Reform," China, May 2006.
13. Darussalam and Danny Septriadi, "**Tax Collection Enforcement**," The Proceedings of International Seminar on "Harmonious Society and Judicial Tax Reform," China, May 2006.
14. Darussalam and Danny Septriadi, "**Settlement of Tax Dispute Mechanism**," The Proceedings of International Seminar on "Harmonious Society and Judicial Tax Reform," China, May 2006.
15. Darussalam and Danny Septriadi, "**Menyoal Denda atas Keberatan dan Banding yang Ditolak**," *Bisnis Indonesia Newspaper*, Apr. 23, 2007.
16. Darussalam and Danny Septriadi, "**UU PPh Perlu Mengatur Anti Penghindaran Pajak**," *Bisnis Indonesia Newspaper*, May. 21, 2007.
17. Darussalam and Danny Septriadi, "**Withholding Tax di Indonesia Masih Jauh dari Pakem**," *Indonesian Tax Review Magazine*, (2007).
18. Darussalam and Danny Septriadi, "**Pemajakan atas Illusory Gain di Indonesia**," *Ortax Online*, 2007.
19. Darussalam and Danny Septriadi, "**When Bad Things Happen to Good Taxpayer**," *Ortax Online*, 2007.
20. Darussalam and Danny Septriadi, "**Beda Negara Beda Pandangan dalam hal Tax Avoidance**," *InsideTax Magazine*, Introduction edition (September 2007).
21. Darussalam and Danny Septriadi, "**Tax Treaty Shopping dan Anti Penghindaran Pajak**," *InsideTax Magazine*, Introduction edition (September 2007).
22. Darussalam and Danny Septriadi, "**Dampak Jika Pasal Independent Personal Services dalam P3B Indonesia diasimilasikan dalam Pasal Permanent Establishment**," *InsideTax Magazine*, Introduction edition (September 2007).
23. Darussalam and Danny Septriadi, "**Kapan Saat Terutang PPh Pasal 26 atas Bunga?**" *InsideTax Magazine*, Introduction edition (September 2007).
24. Darussalam and Danny Septriadi, "**Abuse of Transfer Pricing di Indonesia: Real or Myth?**" *InsideTax Magazine*, 1st edition (November 2007).
25. Darussalam and Danny Septriadi, "**Advance Pricing Agreement (APA) sebagai Alternatif Pemecahan Sengketa Transfer Pricing**," *InsideTax Magazine*, 1st edition (November 2007).
26. Danny Septriadi, Darussalam, and Indrayagus Slamet, "**Abuse of Transfer Pricing melalui Tax Haven Countries**," *InsideTax Magazine*, 1st edition (November 2007).
27. Darussalam and Danny Septriadi, "**Peran Putusan Pengadilan Negara Lain dan Pendapat Akademisi dalam Tax Treaty Interpretation**," *InsideTax Magazine*, 1st edition (November 2007).
28. Darussalam and Danny Septriadi, "**Menunggu Lahirnya Ombudsman Pajak di Indonesia dalam rangka Peningkatan Kualitas Sistem Perpajakan**," *InsideTax Magazine*, 2nd edition (December 2007).
29. Darussalam and Danny Septriadi, "**Pentingnya Advance Ruling dalam Self-Assessment System**," *InsideTax Magazine*, 2nd edition (December 2007).
30. Darussalam and Danny Septriadi, "**Kapan suatu Agen Dianggap Sebagai Permanent Establishment?**" *InsideTax Magazine*, 3rd edition (January 2008).
31. Darussalam and Danny Septriadi, "**Perlunya Pembatasan Withholding Tax atas Penghasilan Usaha dalam RUU PPh**," *Ortax Online*, January 2008.
32. Darussalam and Danny Septriadi, "**Indonesian Transfer Pricing Documentation: Quo Vadis?**" *InsideTax Magazine*, 4th edition (February 2008).
33. Darussalam and Danny Septriadi, "**Catatan Tentang Ketentuan Kuasa Wajib Pajak Sejak UU KUP 2000 sampai UU KUP 2007**," *InsideTax Magazine*, 4th edition (February 2008).
34. Darussalam and Danny Septriadi, "**Ada Apa Dibalik Ketentuan Kuasa Wajib Pajak?**" *InsideTax Magazine*, 5th edition (March 2008).
35. Darussalam and Danny Septriadi, "**Transfer Pricing, Pemegang Saham Minoritas, dan Akuntan Publik**," *InsideTax Magazine*, 5th edition (March 2008).
36. Darussalam and Danny Septriadi, "**Hubungan antara PP No. 80 Tahun 2007 dan PMK No. 22/PMK.03/2008: Suatu Kajian Hukum**," *InsideTax Magazine*, 6th edition (April 2008).

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37. Darussalam and Danny Septriadi, “**PMK No. 43/ KMK.03/2008: Ketentuan Tentang Anti Penghindaran Pajak atas Pengambilalihan Kompensasi Kerugian,**” *InsideTax Magazine*, 6th edition (April 2008).
38. Darussalam and Danny Septriadi, “**Cross-border Intra Group Service,**” *InsideTax Magazine*, 7th edition (May 2008).
39. Darussalam and Danny Septriadi, “**PMK No. 22/ PMK.03/2008: Tax Community Friendly atau Tax Profession Friendly?**” *InsideTax Magazine*, 9th edition (July 2008).
40. Darussalam and Danny Septriadi, “**Pembagian Hak Pemajakan atas Suatu Jenis Penghasilan Berdasarkan OECD Model Tax Treaty,**” *InsideTax Magazine*, 12th edition (October 2008).
41. Darussalam and Danny Septriadi, “**Rugi Derivatif untuk Tujuan Spekulasi: Deductible or Not?,**” *Ortax Online*, May 2009.
42. Darussalam and Danny Septriadi, “**Menghindari Pembonceng Pajak Gratis,**” *Bisnis Indonesia Newspaper*, Jan. 11, 2010.
43. Darussalam and Danny Septriadi, “**Making Taxation Everybody’s Business,**” in *Indonesia Economic Almanac 2011*, Pustaka Bisnis Indonesia, 2011.
44. Danny Septriadi, “**Danny Darussalam Provides Cross-border Businesses with Borderless Knowledge,**” *South China Morning Post*, June 2016.
45. Danny Septriadi, “**Menimbang Lagi Scare Tactics di UU KUP**” *DDTCNews* <http://bit.ly/2nqFBVV>, Jun 05, 2016.
46. Danny Septriadi, “**Mendadak Transfer Pricing**” *DDTCNews* <http://bit.ly/2mqead3>, Jun 12, 2016.

SPEAKER:

A speaker or guest speaker in various seminars, workshops, in-house training, discussions, and training in the field of taxation which held, among others, by:

1. DDTC.
2. Fiscal Policy Agency (BKF), Ministry of Finance.
3. Directorate General of Taxes (DGT).
4. Secretariat of Tax Supervisory Committee.
5. Secretariat of Tax Court
6. PUSDIKLAT Pajak.
7. Indonesia Tax Consultants Association (IKPI).
8. Indonesian Institute of Accountants (IAI).
9. Astra International.
10. Unilever Indonesia.
11. The University of Indonesia.
12. Bina Nusantara University.
13. Tarumanagara University.