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**Investment:** IDR 2.500.000 (IAI Member), IDR 3.000.000 (Non-IAI Member)

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# ABOUT IAI

**Ikatan Akuntan Indonesia (IAI)** was established in 23 December 23 1957 in Jakarta as the recognised accountancy professional body in Indonesia. On international scale, IAI is a member of the International Federation of Accountants (IFAC) since 1997. Within ASEAN, IAI became a founding member of the ASEAN Federation of Accountants (AFA) and since 2011 has been recognised as the permanent secretariat of AFA. On 19 December 2014, as part of the IAI XII National Congress, the Congress has officially agreed on the renaming of the Institute's English to Institute of Indonesia Chartered Accountants.

For more info ► [www.iaiglobal.or.id](http://www.iaiglobal.or.id)



IKATAN AKUNTAN INDONESIA

# ABOUT BvD

**Bureau van Dijk** Bureau van Dijk (BvD) is the leading provider of private company, corporate ownership and deal information. BvD's product range combines data from regulatory and other sources, including 120 information partners, with flexible software to allow users to manipulate data for a range of research needs and applications. Its Orbis database provides information on over 160m companies across the globe.

In addition, BvD addresses specific business challenges through its range of Catalysts including transfer pricing, credit, procurement, KYC, client on-boarding, M&A research and valuations, while BvD custom delivers fully bespoke solutions. BvD also publishes the global M&A database, Zephyr.

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Presented by  
**Institute of Indonesia Chartered Accountants  
 Tax Accountants Compartment (IAI KAPj)  
 and Bureau van Dijk**

Keynote Speech by:

**Prof. Mardiasmo**

Chairman of Institute of Indonesia Chartered Accountants/Vice Minister of Finance Republic of Indonesia

**Sigit Priadi Pramudito**  
 Director General of DGT, Ministry of Finance

THEME

“  
**TRANSFER PRICING**  
 IN THE ERA OF  
 TRANSPARENCY

DATE: Tuesday, 15 September 2015 TIME: 09.00 – 17.00 VENUE: Ballroom Grand Hyatt Hotel Jakarta

# INTRODUCTION

**V**ICE Minister of Finance/Chairman IAI, Prof. Mardiasmo said, as part of the global trading community, Indonesia can not be separated from the impact of transfer pricing. Therefore Indonesia must make relevant rules that the practice does not harm the nation's economy.

In the last five years, transfer pricing becomes an attention-grabbing taxation issue in Indonesia. The statement "Transfer Pricing is not an exact science" has led this issue to become more complicated for a discussion as every person tends to have different views based on their own experience and knowledge. Thus, a tax dispute on related party transaction is more likely to occur between the Taxpayer and the Tax Office.

Related to such issue, Institute of Indonesia Chartered Accountants Tax Accountant Compartment would like to participate to mitigate the occurrence of tax disputes by holding a TP Expo. In this event, it is expected that the different interpretations and understandings can be reduced. During the TP Expo on the theme of "Transfer Pricing in the Transparency Era", the participants are expected to deeply understand the tax regulations and the Directorate General of Taxes' policy direction, concerns in association with the transfer pricing implementation in Indonesia and other countries, as well as the transfer pricing implementation in several developed countries.

Agenda of TP Expo 2015, in the first panel discussion, the panelists will elaborate the government policies and regulations on transfer pricing and the government policy direction in the future. All panelists will share their experience in relation to the tax issues and disputes that occurred due to the implementation

of the regulations. Then, in the second panel discussion, the panelists will provide details on the development of Base Erosion and Profit Shifting (BEPS) project, particularly related to the transfer pricing issue. Next, the speakers in the third panel discussion will talk about the use of intangible assets and procurement of service, including how the intangible assets used and the procurement of service performed and become an expense based on the tax regulations on transfer pricing. The fourth panel discussion will take up one of the interesting issues in Indonesia, which is tax audit, objection, and appeal on tax disputes related to transfer pricing issues, as well as the settlement of tax disputes through Mutual Agreement Procedure. In 2013, the Directorate General of Taxes has issued two regulations as guidelines in the transfer pricing audit, which are PER-22/PJ/2013 and SE-50/PJ/2013.

The panelist will elaborate the stages of transfer pricing audit by the Directorate General of Taxes, and included the matters occurred during the audit, objection, appeal, and MAP. Finally, the Advance Pricing Agreement (APA) will be explained during the fifth panel discussion. In line with intense audit on transfer pricing issues, APA becomes an attractive alternative for the Taxpayer to mitigate the risk of tax correction from transfer pricing side. This discussion will provide details on how the APA application process is and the barriers in APA implementation.

## PARTICIPANTS:

Company Owners, Directors, Financial and Tax Managers, Tax Consultants, Public Accountants, Academics, Students.

various business ventures. She has been involved in PwC numerous tax advisory assignments on corporate mergers and acquisitions, tax due diligence investigations, cross-border transfer pricing issues and defence cases, handling tax refunds, secured favourable tax rulings and tax dispute resolution cases.

She has gained valuable international experience working in PwC Australia transfer pricing group based in Melbourne.

## 6 PERMANA ADI SAPUTRA

Permana Adi Saputra serves as the Transfer Pricing Partner in PB Taxand. Permana's role in PB Taxand includes assisting client in the preparation of Transfer Pricing Documentation, representing clients in the tax audit, tax objection and appeal related to Transfer Pricing cases, and assist clients in applying the Advance Pricing Agreement. Permana actively participates in discussion with Tax Officers regarding Transfer Pricing issues in Indonesia. Currently he also serves as Secretary General of Ikatan Akuntan Indonesia Kompartemen Akuntan Pajak for 2014-2016. He graduated from University of Indonesia with a Master in Management and Bachelor in Economics.



## 7 DANNY SEPTRIADI

Danny Septriadi is Director of DANNY DARUSSALAM Tax Center and a lecturer at Graduate Program in Tax Policy and Administration Science and at Master in Accounting Program at the University Of Indonesia. He is acknowledged as an expert witness on 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.



## 8 MUHAMMAD TAUFIQ HIDAYATULLOH AL MAHDY

Graduated as Master Degree of Public Administration of Faculty of Law, Kyushu University of Japan. His current position is Chief of Section of Tax Treaty for Europe Region. His current duties involve drafting and formulating tax laws and regulations in particular regarding to international taxation, Tax treaty negotiation and Managing and handling Mutual Agreement Procedures and Advance Pricing Agreement.

# SPEAKER PROFILE

## 1 LUIS CARILLO

Luis Carrillo is a transfer pricing specialist with 14 years of advisory experience, including Big Four and Software. He's the director of Transfer Pricing Solutions at Bureau van Dijk (BvD) and is responsible for guiding BvD's value proposition in the transfer pricing market, which includes tax authorities, advisory firms and multinational corporations. He also conducts transfer pricing trainings with numerous tax authorities on the use of BvD's tools and transfer pricing best practices. Mr. Carrillo holds a Bachelor's degree in Economics from the University of California, Santa Cruz.



## 2 RACHMANTO SURAHMAT

Graduated from International Tax Program - Harvard Law Massachusetts, U.S.A. (August 1974), earned bachelor in accounting from University of Gajah Mada, Bachelor, (1968), earned his master of accounting from University of Indonesia (2010) International Tax Program - Harvard Law School, Massachusetts, U.S.A. (August 1974).



His current job position from 2003-now: Partner in Ernst & Young and he was Tax official, Directorate of Taxation 1969-1993 And 1993-2001 Director of International Taxation, Directorate General of Taxes

He also Chairman of International Fiscal Association, Indonesia Branch Teaching at Master Program in Accounting at the University of Indonesia, since 2003.

## 3 ARMAN IMRAN

Earned his Bachelor of Accounting from Department of Accounting, Padjadjaran University (1998), and Master of Business from Queensland University of Technology (2010). His current position is Deputy Director of Transfer Pricing and Other Special Transaction Audit, DGT (April 2012-present).



## 4 CARLO L. NAVARRO

Carlo L. Navarro leads Deloitte Indonesia's Transfer Pricing practice and specializes in transfer pricing, international corporate restructuring and planning, cross-border taxation, and tax-effective supply chain transformations. Before joining Deloitte, Carlo led transfer pricing and international tax practices of a Big 4 firm. He has over 17 years of experience working in various jurisdictions in Southeast Asia as an International Tax and Transfer Pricing practitioner, giving him practical experience in dealing with Tax Authorities of these countries.



## 5 AY-TJHING PHAN

She is the Head of Tax and Transfer Pricing Leader and Consumer and Industrial Products and Service group in PwC Indonesia with many years of experience in various taxation fields. She has extensive experience in tax planning, restructuring and modelling for



# THE AGENDA

SCHEDULE	AGENDA
08.00 - 09.00	60' Registration and Coffee Break
09.00 - 09.05	05' Opening by MC
09.05 - 09.20	15' Opening Speech - <b>Prof. Mardiasmo*</b> , Chairman of Institute of Indonesia Chartered Accountants/Vice Minister of Finance Republic of Indonesia
09.20 - 09.30	10' Opening Speech - <b>Mr. Johnny Sim</b> , General Manager Bureau van Dijk
09.30 - 10.00	30' Keynote Speech - <b>Mr. Sigit Priadi Pramudito*</b> , Director General of DGT, Ministry of Finance
10.00 - 11.00	60' Panel Discussion 1 <b>"Development of BEPS Project and Best Practices of International Transfer Pricing"</b> Speakers: • <b>Mr. Rachmanto Surahmat*</b> - Partner, Ernst & Young Indonesia • <b>Mr. Taufiq Hidayatulloh AM*</b> - Chief of Section Tax Treaty for Europe Region - DGT • <b>Ms. Lisa A.*</b> Cea-Bureau of Internal Revenue, Philippines Moderator: <b>Ms. Christine Tjen*</b> - Tax Expert, Universitas Indonesia
11.00 - 12.00	60' Panel Discussion 2 <b>"Transfer Pricing in Indonesia: Regulations and Future Policy Direction"</b> Speakers: • <b>Mr. Achmad Amin*</b> - Deputy Director Tax Treaty and International Cooperation - DGT • <b>Mr. Jul Saventa Tarigan*</b> - Deputy General Manager Tax - PT Adaro Energy • <b>Mr. Carlo L. Navarro*</b> - Partner, Deloitte Tax Solution Moderator: <b>Ms. Dwi Ary Retnani*</b> - Senior Director - Harsono Strategic Consulting
12.00 - 13.00	60' Lunch
13.00 - 13.30	30' Taxation Update: TNMM Vs Resale Price Method with External Comparables Speaker: <b>Mr. Luis Carrillo</b> , Director - Transfer Pricing, Bureau van Dijk UK
13.30 - 14.30	60' Panel Discussion 3 <b>"How to Deal with Transfer of Intangible and Service Transactions"</b> Speakers: • <b>Mr. Arman Imran*</b> - Deputy Director of Transfer Pricing and other Special Transaction Audit - DGT • <b>Ms. Ay Tjhing Phan*</b> - Pricewaterhouse Coopers Indonesia Moderator: <b>Ms. Ratna Febrina*</b> - Partner, SF Consulting
14.30 - 15.30	60' Panel Discussion 4 <b>"How to Resolve Transfer Pricing Disputes"</b> Speakers: • <b>Mr. Edi Slamet Irianto*</b> - Director of Audit and Collection - DGT • <b>Mr. Benny Redjo Setyono*</b> - Vice President Director of PT Alam Sutera Realty Tbk. • <b>Mr. Permana Adi Saputra</b> - Partner of PB Taxand Moderator: <b>Ms. Dwi Wulandari*</b> - Directorate General of Taxation, Ministry of Finance
15.30 - 15.45	15' Coffee Break
15.45 - 16.45	60' Panel Discussion 5 <b>"Avoid Dispute through APA program"</b> Speakers: • <b>Mr. Danny Septriadi*</b> , Director of Danny Darussalam Tax Center • <b>PT Frisian Flag Indonesia*</b> Moderator: <b>Ms. Ella*</b> - Section Chief Tax Treaty and International Cooperation - DGT
16.45 - 17.00	15' Closing Remarks and Summary by <b>Prof. John Hutagaol</b> - Chairman of IAI Tax Accountant Compartment/Director of Taxes Regulation II DGT

\*on confirmation