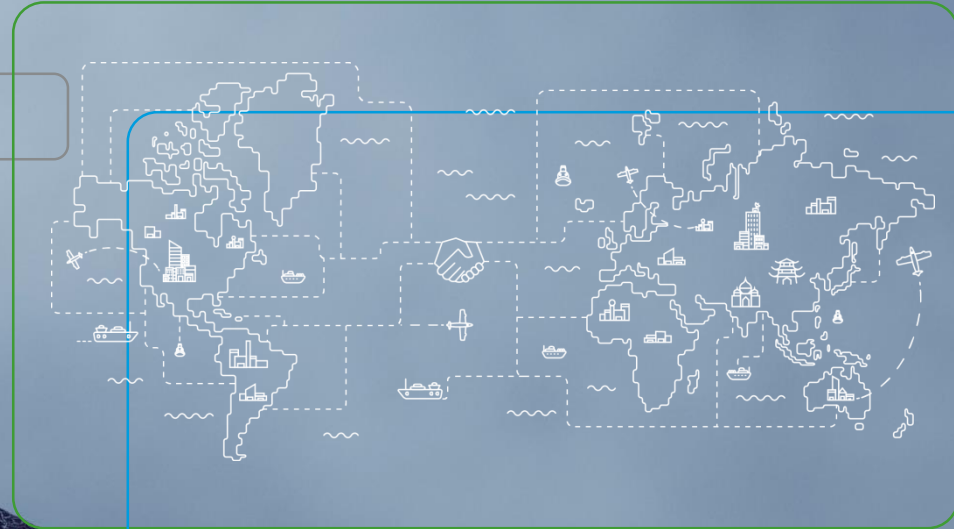


THE POWER OF BEING UNDERSTOOD

AUDIT | TAX | CONSULTING



41,000 MINDS, 750 OFFICES, 116 COUNTRIES, 1 NETWORK.

RSM Indonesia



We are one of the largest global audit, tax and consulting network.



We have firms in 116 countries and are in each of the top 40 major business centres throughout the world.



We have combined staff of over 41,000 in over 750 offices across the Americas, Europe, MENA, Africa and Asia Pacific.



We are member of the Forum of Firms, dedicated for firms that perform transnational audit on a consistent and high-quality standards of financial reporting and auditing practices worldwide.



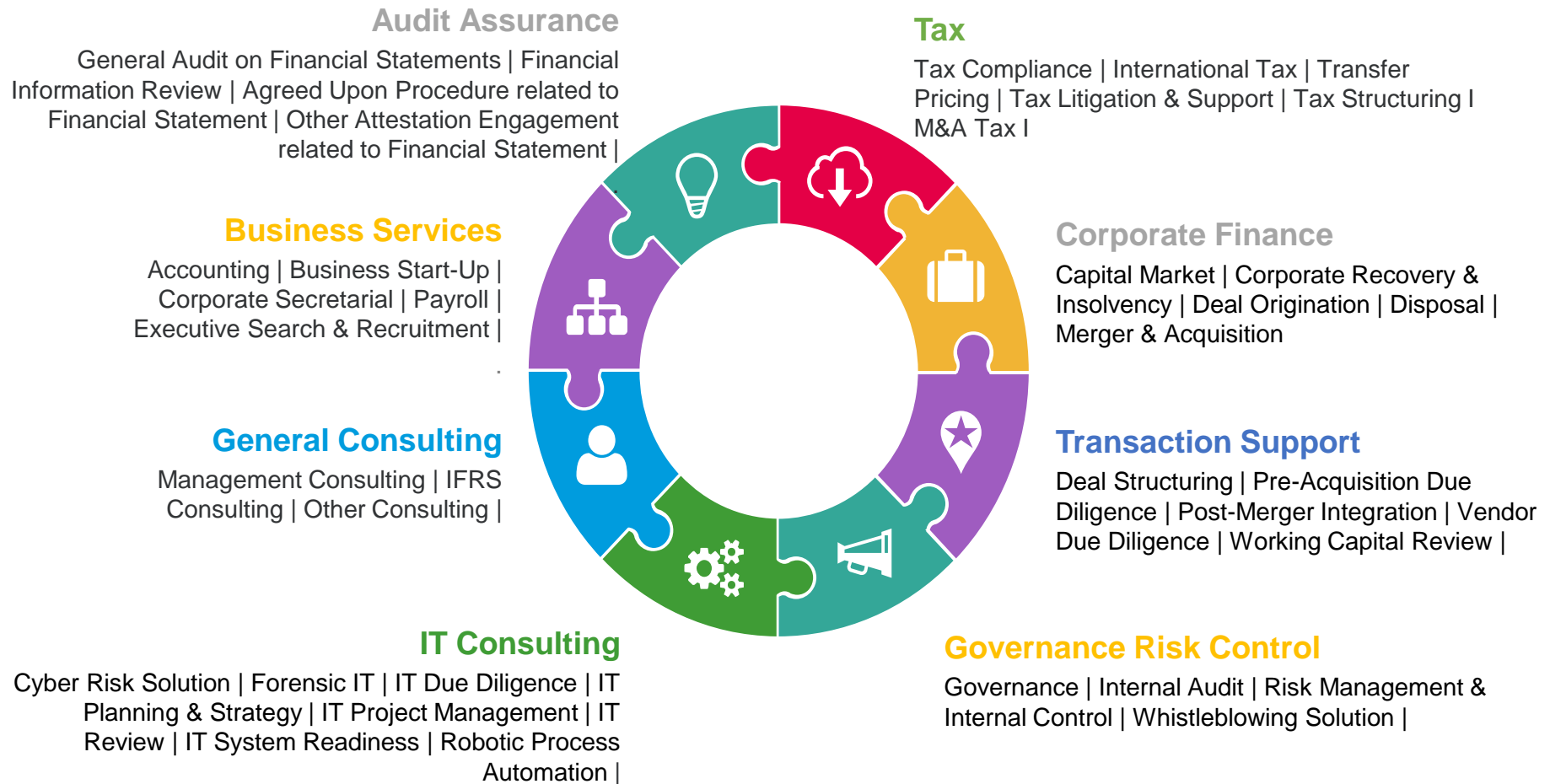
We have been recognised as the Network of the Year 2017 at The Accountant and International Accounting Bulletin Awards.

RSM Indonesia is a member of the RSM network. We have been operating for more than 30 years in Indonesia, and RSM has been operating globally for more than 50 years.

RSM in Indonesia was established in 1985 and become part of RSM in 1992. Since its establishment, it grew to be an integrated professional services firm of AAJ Associates, then RSM AAJ, and now RSM Indonesia.

Established offices in Jakarta and Surabaya, we are positioned as one of the leading audit and consulting firm in Indonesia. For the last 10 years, we are positioned at the 3rd place in the number of publicly listed companies audited.

Our Services in Indonesia



Our Tax Services

RSM Indonesia Tax Team provides full range of tax services to assist you realizing your business plan:

Tax Compliance

- ✓ Monthly and Yearly Compliance
- ✓ Corporate Income Tax, VAT, Withholding Tax, etc
- ✓ Tax Diagnostic Review
- ✓ Tax Due Diligence

Tax Advisory

- ✓ Merger and Acquisition Deal
- ✓ Tax Structuring, optimization
- ✓ Tax Incentive Application
- ✓ International Tax
- ✓ Customs Advisory

Tax Dispute Resolution

- ✓ Tax Audit Process
- ✓ Objection
- ✓ Tax Appeals

Transfer Pricing

- ✓ Transfer Pricing Studies
- ✓ Post-transaction Transfer Pricing Documentation: Local File, Master File and CbCr
- ✓ Benchmarking Analysis

RSM INDONESIA Tax Updates Program

Time	Program
09:30 - 09:50	Tax Audit Environment & Development in Indonesia – by Sentot A Priyanto
09:50 - 10:10	Tax Incentives in Indonesia – by Nicholas Graham
10:10 - 10:30	Transfer Pricing Updates – by Untoro Sejati
10:30 – 11:00	IFRS 71, 72 and 73 – by Clarence Juvenal & Eny Susetyoningsih
11:00 - 11:45	Q&A
11:45 – 13:00	Lunch & Networking

OUR TEAM



Nicholas Graham
Partner,
Business Services &
Tax



Ichwan Sukardi
Managing Partner,
Tax



Sentot A. Priyanto
Partner,
Tax



Ivoni Noviana
Partner,
Tax



Eny Susetyoningsih
Partner,
Tax



**Rezania Ulfah
Candrakirana**
Partner,
Tax



Untoro Sejati
Partner,
Transfer Pricing



Abdullah, S.E., M.M.
Senior Manager,
Tax



Rizal Awab
Senior Manager,
Tax



**Selamat Sodugaon
Carl Fransiscus**
Manager,
Tax



Sophia She Jiaqian
Senior Manager,
Tax

• OMNIBUS LAW – taxation issues

Tax Provisions and Facilities to Strengthen the Economy

1. **Reduction of tax rates:** 2021 – 2022 to **22%** and to **20%** by 2023
2. **No Tax on the Dividend Distribution:** applies for both individual and corporations, as well as domestic and offshore dividend
3. **Introduction of territorial basis:** Individual taxpayers would no longer be subject to the WWI
4. **Reduction of penalty for non-compliance:** 2% penalty is reduced to 1%
5. **Ease input VAT mechanism:** revision of various input VAT that cannot be credited
6. **Tax incentives:** tax incentives will be regulated all under the law
7. **Taxing the digital economy:** new rules on taxing the digital economy will be introduced

Key Personnel | Ichwan Sukardi



Ichwan Sukardi

Managing Partner, Tax

ichwan.sukardi@rsm.id

Master's Degree in International Tax Law,
International Tax Centre, Leiden University, The
Netherlands

Master's Degree in Business Administration,
Prasetiya Mulya Business School, Indonesia

Bachelor's Degree in Law, Faculty of Law University
of Indonesia

Registered Tax Consultant, Brevet C Category issued
by the Director General of Taxation-Indonesia

Chairman of International Fiscal Association

- Ichwan is the Managing Partner of Tax within RSM Indonesia. Prior to joining RSM Indonesia, Ichwan spent more than 18 years with big 4 tax firm and was the head of energy sector and a tax partner.
- With more than 20 years of professional experience, Ichwan is experienced in a range of international tax issues, including tax treaties, international transfer pricing, tax structuring and international tax planning.
- Ichwan has been providing tax advisory to a wide range of multi-national and domestic companies across different industries with a keen focus on energy sector.
- Ichwan was exposed to the real oil and gas industry, being the global head of corporate tax of Medco Energi Internasional (the largest Indonesian listed oil and gas company) in 2012-2015.
- He regularly speaks around Indonesia and region on taxation of oil and gas, mining, investments, and other general tax issues. He is a regular contributor for taxation issues in some reputable magazine, newspaper, and other tax publication.
- Ichwan gives lecture on International Tax subject in Leiden University, the Netherlands, and University of Indonesia on several subjects.
- Member of the Indonesian Tax Consultants' Association (IKPI), the Indonesian Bar Association (Peradi), the Indonesian Petroleum Association (IPA), and the International Fiscal Association.

Key Personnel | Nicholas Graham



Nicholas James Graham
Partner, Business Services & Tax
nick.graham@rsm.id

Bachelor of Business, University of Technology,
Sydney, Australia

Diploma of Applied Finance, Securities Institute of
Australia.

Member of American Chamber of Commerce

- Nicholas joined RSM Indonesia in 2000 with current position as Managing Partner. He has over 26 years of tax and business advisory experience in Indonesia assisting various types of companies, from public, private, and state-owned enterprises.
- Nicholas is a qualified Chartered Accountant having completed the professional year program of the Institute of Chartered Accountants of Australia and is also a fellow of the Financial Services Institute of Australia (FinSIA).
- Nicholas has been providing tax services for several projects, including the following:
 - International tax advisory
 - Operational restructuring
 - Tax Consulting
 - Corporate licenses
 - Company establishment
 - Liquidation assistance

Key Personnel | Eny Susetyoningsih



Eny Susetyoningsih

Partner, Tax

eny.susetyoningsih@rsm.id

Bachelor in Economics, majoring in Accounting,
Sekolah Tinggi Ilmu Ekonomi Malangkecewara

RSM iTax Academy Master Class in Amsterdam

Registered Tax Consultant, Brevet C Category issued
by the Director General of Taxation - Indonesia

Registered Tax Attorney at the Indonesian Tax Court

- Eny is a Tax Partner within RSM Indonesia with more than 20 years experiences. She has in-depth knowledge of the full range of Indonesia tax issues, including corporate income tax, tax compliance, tax review, and tax disputes to wide range of multi-national and domestic companies in variety of industry.
- Eny is experienced in a range of international tax issues, including tax treaties, international transfer pricing, tax structuring and international tax planning.
- Prior to joining RSM Indonesia, Eny spent more than 12 years with BIG 4 tax firm and others.
- Eny has been providing tax services to several projects and company operations, including the following:
 1. Tax audit in several industries such as trading, manufacturing, and services companies.
 2. Tax disputes in several industries.
 3. Transfer pricing in trading and services companies.
 4. Tax advisory in services companies and trading companies.
 5. Tax judicial review about value added tax and corporate tax in several industries.
 6. Tax due diligence for services companies.
 7. Tax diagnostic review for several industries.

Key Personnel | Sentot A. Priyanto



Sentot A. Priyanto

Partner, Tax

sentot.priyanto@rsm.id

Bachelor of Economic, majoring in Accounting,
Universitas Indonesia

Bersertifikat Konsultan Pajak (BKP)

- Sentot is partner at RSM Indonesia with 23 years of experience.
- He is specialized in providing tax due diligence; annual tax return; corporate tax audit; monthly tax compliance; tax appeal; tax diagnostic review; tax objection; as well as tax consulting.

Relevant work experience

- Perform tax restructuring for various company such as reorganizing the legal, ownership, operational, or other structures of a company in order to make the company more profitable and better organized.
- Design Tax Planning for various company in order to ensure tax efficiency and establish better financial plan for the company.
- Provide tax advice in relation to doing business in Indonesia and cross-border investment transactions such as services, royalties, dividend, etc.
- Provide tax advice of tax implications in relation to cross-border transactions Provide tax analysis for transfer pricing related to local and cross-border group transactions.
- Conduct a tax due diligence in various industry in connection to setup a joint venture, acquisition, merger, etc.
- Conduct tax review in various industry to review a potential tax exposure on company transactions.
- Provide monthly and annual tax compliance services for various industry clients.
- Provide assistance for client's tax dispute (tax audit, tax objection, tax appeal, and tax appeal at supreme court).

Key Personnel | Ivoni Noviana



Ivoni Noviana

Partner, Tax

ivoni.noviana@rsm.id

Bachelor's Degree in Fiscal Administration, University of Indonesia

Registered Tax Consultant, Brevet C Category issued by the Director General of Taxation-Indonesia

Registered Tax Attorney at the Indonesian Tax Court since 2009

- Ivoni is a tax partner within RSM Indonesia with more than 16 years of professional experience in providing tax services to Indonesian clients and clients located in overseas.
- Prior to joining RSM Indonesia, Ivoni was Asia Pacific Tax Manager with an oilfield services company listed in New York Stock Exchange and spent more than 10 years with big 4 tax firm in Indonesia.
- During her tenure as Asia Pacific Tax Manager, her employer obtained an approval from the Australian Taxation Office and the Inland Revenue Authority of Singapore for Advance Pricing Arrangement ("APA") between an entity in Australia and an entity in Singapore. While an entity in Malaysia received an approval for extension of tax incentive from the government of Malaysia.
- Ivoni has been involved in various types of assignments related to corporate taxation including tax advisory for multinational companies, tax structuring, reviewing contract, tax disputes resolutions including representing clients in the Indonesian tax court and Indonesian tax office, tax due diligence, tax diagnostic review and tax compliance services.
- Ivoni assists tax provision and return to provision/true-up under ASC 740 – US GAAP.

Key Personnel | Rezania Ulfah Candrakirana



Rezania Ulfah Candrakirana

Partner, Tax

Rezania.ulfah@rsm.id

Master's Degree in Taxation, University of Indonesia

Bachelor's Degree in Fiscal Administration, University of Indonesia

Member of Indonesia Association of Tax Consultant,
Brevet A

Member of Indonesia Association of Tax Attorney

- Rezania is Partner in RSM Indonesia.
- Rezania had been providing tax consulting since 2006. Prior to joining RSM Indonesia in 2018, She has also developed her experience in taxation in other Tax Consulting firm and a Multi-National Company.
- She has in-depth knowledge of the full range of Indonesian tax issues, including corporate income tax, VAT, withholding taxes, and taxation on corporate restructuring. In addition to providing general tax advice, Rezania has experience in conducting tax diagnostic reviews to ensure proper tax compliance, providing assistance during tax audits, objection, appeals/lawsuits, and also civil review to the Supreme Court.
- Rezania specializes in energy and natural resources. Her major clients include oil and gas, mining companies and supporting services of energy and natural resources. She has developed a comprehensive view of accounting issues for oil and gas industry. Other than oil and gas she also has comprehensive experience in the sectors of consumer and industrial products, pharmacy, entertainment, telecommunication, drilling, shipping, and plantation.

Key Personnel | Untoro Sejati



Untoro Sejati

Partner, Transfer Pricing

untoro.sejati@rsm.id

Master of Laws, LL.M., University of Vienna, 2016

Bachelor of Economics, Universitas Indonesia, 2000

Certified Accountant Indonesia (CA)

Certified Public Accountant

- Untoro is a tax partner with more than 10 years of professional experience in providing transfer pricing services to Indonesia clients and clients located in overseas.
- Untoro is experienced in handling the transfer pricing controversies, as well as the design, review, implementation and documentation of transfer pricing policies for various industries e.g. apparel, automotive, real estate & construction, banking & financing, cement, chemicals, electronic device, food and feed additives, heavy equipment, mining, oil & gas, plantation, power transformer, digital and telecommunications, others.
- Untoro has been providing transfer pricing litigation and business restructuring by developing, preparing, and drafting defend-able argumentation to mitigate clients' transfer pricing risks, as well as representing clients' transfer pricing positions and stand on behalf of clients against tax authorities.
- Untoro has been providing transfer pricing advisory and developing sound transfer pricing policy for clients' upcoming business project, using both legal and practical perspective, as well as considered the tax and commercial aspects. These are involving price/margin setting of intra-group transactions and risk mitigation analysis of the intended transactions scheme.

Key Personnel | Abdullah, S.E, M.M.



Abdullah, S.E, M.M.

Senior Manager, Tax

abdullah.busrodin@rsm.id

Bhayangkara Jakarta Raya Major in Magister
Management

University Medan Area Major in Economic Accounting
STAN

Major in Diploma of Economic Accounting

- Abdullah is a Senior Tax Manager in RSM Indonesia. Prior to joining RSM Indonesia, he was working as Middle Tax Examiner for Kantor Pelayanan Pajak Penanaman Modal Asing Tiga" Oax Service Office for Foreign Investment Three) - 2014 to 2018.
- Middle Tax Examiner for "Kantor Pelayanan Pajak Madya Bekasi" (Middle Class Tax Service Office for Bekasi Area) - 2012 to 2014.
- Junior Tax Examiner for "Kantor Pelayanan Madya pekanbaru" (Middle Class Tax Service Office for Pekanbaru Area) 2008 to 2012.
- Junior Tax Examiner for "Kantor Pelayanan Pajak Penanaman Modal Asing Enam" Tax Service Office for Foreign Investment Six) 2004 to 2008.
- Tax Auditor for "Kantor Pemeriksaan dan Penyidikan Pajak Medan 1,, (Tax inspection and investigation Office for Medan I Area) 1999 to 2004.
- Middle Tax Auditor for "Kantor Pemeriksaan dan Penyidikan pajak Pontianak"(tax inspection and investigation Office for Pontianak Area) 1995 to 1999.
- Middle Tax Auditor for "Kantor Pemeriksaan dan Penyidikan Pajak Jakarta Delapan" (Tax inspection and investigation Office for Jakarta Eight Area) 1994 to 1995.
- Junior Tax Auditor for "Unit Pelaksana Penjaminan Perbankan Jakarta Tiga" (Banking Guarantee Implementation Unit for Jakarta 3 Area) 1990 to 1994.
- Executor for "Kantor Pelayanan Pajak Cirebon" (Tax Service Office for Cirebon Area) 1982 to 1990.

Key Personnel | Selamat S Carl Fransiscus



Selamat Sodugaon Carl Fransiscus
Manager, Tax

selamat.sodugaon@rsm.id

Magister Sains (M.Si), Fisip UI, Ilmu Administrasi dan Perencanaan Perpajakan, Universitas Indonesia (2009)

Sarjana Ekonomi (SE), Jurusan Akuntansi, Universitas Brawijaya (2000)

Chartered Accountant – Ikatan Akuntan Indonesia

- Carl is a Tax Manager in RSM Indonesia with more than 18 years of work experiences. Prior to joining RSM Indonesia, he had work experiences as Tax Auditor in the DGT as well as commercial entities including Honda and IBM.
- Carl has in-depth knowledge of the full range of Indonesia tax issues, including corporate income tax, tax compliance, tax review, and tax disputes to wide range of multi-national and domestic companies in variety of industry.
- Work Experience
 - 2000 – 2001 : Officer Development Program – ANZ Panin Bank
 - 2001 – 2002 : CFP Program and Investment Banking Officer – Bank Danamon Indonesia
 - 2002 – 2013 : Tax Auditor – Directorate General of Tax
 - 2008 – 2013 : Tax Intelligence – Directorate General of Tax
 - 2014 – 2017 : Profesional Tax Advisor – IBM Indonesia
 - 2017 – 2017 : Tax Manager – Honda Trading Indonesia
 - 2016 – now : Tax and Legacy Speaker for CIMB Niaga, Citibank Indonesia, Commonwealth Bank Indonesia, HSBC Indonesia and Sunlife Financial Indonesia
 - 2017 – now : Manager Tax Services – RSM Indonesia

Key Personnel | Rizal Awab



Rizal Awab

Senior Manager, Tax

rizal.awab@rsm.id

Bachelor in Economics, Universitas Trisakti

Master in Accounting, Universitas Trisakti

Bersertifikat Konsultan Pajak (BKP)

- Rizal is a Senior Tax Manager within RSM Indonesia with more than 9 years of professional experience.
- Rizal is specialized in leading corporate tax compliance, tax due diligence, tax audit, tax appeal; tax diagnostic review, tax objection and tax consulting to a diversified portfolio of clients.
- Throughout his tenure, Rizal was well recognized for his ability to provide practical and localized tax solutions to international clients across different industries, including oil and gas, coal mining, manufacturing, pharmaceutical, F&B, investment holdings and others.
- Rizal has ground experience in dealing with Indonesian tax authorities and other governing authorities during the process of assisting his clients in assignments such as incentive application, tax audit, tax court appeal and has successfully helped his clients to resolve some of the major tax dispute cases.
- Rizal is also experienced in a range of international tax issues, and possesses in-depth knowledge on application of treaties, withholding taxes, and tax restructuring.

Rizal has led and performed plethora of tax advisory, compliance, and due diligence projects involving a diversified portfolio of clientele, including:

- Tax audit and dispute for all taxes in respect of oil and gas, consumer and manufacturing entities
- Tax due diligence for acquisition within manufacturing industries
- M&A tax structuring advisory representing seller side, involving one of Indonesia's largest IPP entity divesting part of its energy portfolio to bidders linked up by JP Morgan
- Tax advisory to one of Indonesia's largest e-commerce giant on intra-group services agreement, acquisition of start-up, and shareholding restructuring, etc.

Key Personnel | Sophia She Jiaqian



Sophia She Jiaqian
Senior Manager, Tax
sophia.jiaqian@rsm.id

Bachelor in Applied Accountancy,
Oxford Brooks University, UK

The Association of Chartered
Certified Accountants (ACCA)
Affiliate

- Sophia is a Senior Tax Manager within RSM Indonesia. Prior to joining RSM Indonesia, Sophia was based in Singapore and worked in other tax consulting firms including one of the big 4. With more than 6 years of professional experience in providing corporate compliance and advisory services and having served clients with business background in both Singapore and Indonesia, Sophia is well versed in her technical knowledge of tax issues in the region.
- Sophia is experienced in a range of international tax issues, and possesses in-depth knowledge on application of treaties, withholding taxes, and tax restructuring.
- She has handled tax cases for a wide range of multi-national companies in industries across oil and gas, manufacturing, telecommunication, consumer and industrial products, pharmaceutical, e-commerce, investment holdings and others.
- Throughout her tenure, Sophia has been involved in various types of assignments related to corporate taxation including tax advisory for multinational companies, tax structuring, tax due diligence, tax diagnostic review and tax compliance services.
- Sophia is a native Chinese and lived in Singapore for more than 10 years. She is fluent in both Chinese and English.

Sophia has led and performed plethora of tax advisory, compliance, and M&A projects involving a diversified portfolio of clientele.