

Pillar 2 Rules: Considerations from Indonesian Tax-Payer

Ivan Budiarnawan

February 2022

Pillar 2 Rules: Considerations from Indonesian Tax-Payer

- What are the additional burdens to resident and to non-resident tax-payers both financial and administrative?
- Impact to outbound and inbound investment climate and overall economics

Domestic Legislation:

- Definitions, residency, subject, objects and exclusions
- Calculations and mechanism
- Facts, circumstances, and timing

Interaction with the Prevailing Regulations: both Domestic and International Tax Provisions i.e. Tax Treaties vs STTR provisions for services, PE, Tax Facility and Incentives schemes, CFC , Final Tax and Non-Object Regimes

Exchange of Information between Tax Authorities and Dispute Resolutions

Alignment and Impact to Transfer Pricing Analysis, MAP and APA