

PROGRAM: 3 December 2025



International Fiscal Association
Indonesia Branch

Time	Morning Session Program
08.00 – 08.30	Reception & Registration
08.30 – 08.35	Opening Remarks of the 2025 IFA Indonesia Annual Seminar <ul style="list-style-type: none"> • <i>IFA Indonesia Chairman</i>
08.35 – 09.00	Key Note Speeches: (Introductory and high-level speech on current international tax and transfer pricing updates from the perspective of Indonesian Government and from the perspective of IFA) <ul style="list-style-type: none"> • DR Mekar Satria Utama SE., MP, Acc. - <i>Director of International Tax – Director General of Taxes ("DGT")</i> • Ms. Natalia Quiñones - <i>President of International Fiscal Association</i> *recorded
09.00 – 10.45	1st Session - Topics: The Latest Updates on Pillar 2 This session explores the implications of the OECD's Global Anti-Base Erosion (GloBE) rules under Pillar 2. Speakers will discuss recent international developments and Indonesia's policy direction, implementation roadmap, and the broader impact on multinational groups and regional investment competitiveness. <ul style="list-style-type: none"> • Melani Dwi Astuti - <i>the Ministry of Finance of the Republic Indonesia</i> • Bawono Kristiaji – <i>Tax Partner – DDTC</i> • T Qivi Hadi - <i>Transfer Pricing and International Tax Partner, RSM Indonesia</i> • Yuri Matsubara - <i>Professor of Tax Law – Meiji University, Japan</i> *online <p><i>Chair of Session – Jacob Zwaan, Managing Director of Alvarez Marshal Indonesia</i></p>

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Time	Afternoon Session Program
10.45 – 11.00	Break and Refreshment
11.00 – 12.30	<p>2nd Session – Transfer Pricing in the Era of Global Transparency: Managing Risks and Resolving Disputes</p> <p>Focusing on the latest developments in transfer pricing practices, this session addresses trends in documentation, APAs, MAPs, and dispute resolution mechanisms. Experts will discuss how taxpayers can adapt to increasing transparency, automation, and regulatory scrutiny.</p> <ul style="list-style-type: none">• Permana Adi Saputra, Managing Partner - PB Taxand• Agus Kuncara - The DGT• Emanuel Dewo Adi Winedhar – Managing Partner – TaxPrime• Roy / Balim DT• Mr. Steve Minhoo KIM - Senior Foreign Attorney – Lee & Ko, South Korea *online <p><i>Chair of Session – PB Taxand</i></p>
12.30 – 13.30	LUNCH BREAK

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13.30 – 14.45	<p>3rd Session – Topic: International Tax and Anti-Avoidance Policy Updates</p> <p>This session covers the evolution and enforcement of General and Specific Anti-Avoidance Rules (GAAR & SAAR). It provides comparative insights from global practices and discusses how Indonesia can strengthen its anti-avoidance regime while maintaining investment attractiveness.</p> <ul style="list-style-type: none"> • <i>the DGT – to be confirmed.</i> • Bobby Savero – Transfer Pricing Compliance and International Tax Advisor - Taxprime • Dr. Kyung Geun LEE - Senior Counsel of BKL LLC, South Korea. *online • Xing Hu – Partner – Hui Ye Law, China *) <p>Chair of Session – Christine Tjen of University of Indonesia</p>
14.45 – 15.45	<p>4th Session - Tax Considerations in Mergers and Acquisitions: Structuring, Integration, and Post-Deal Compliance</p> <p>A deep dive into tax challenges in M&A transactions, from deal structuring and due diligence to post-merger integration. This session will explore both domestic and cross-border perspectives, highlighting key lessons from recent transactions and regulatory changes.</p> <ul style="list-style-type: none"> - Ichwan Sukardi – Managing Partner – Tax, RSM Indonesia. - Auaychai Sukawong, Tax Partner, EnDepth Advisory – Thailand *online - Bayu Rahmat Rahayu, Director of Extractive Industries & Transaction – TaxPrime, Indonesia - IFA APAC / SPONSOR - HHP / Louis Coronado <p>Chair of Session – Christine Tjen of University of Indonesia</p>

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Time	Afternoon Session Program
15.45 – 17.00	<p>Panel Discussion and followed by Q&As - Recent international tax developments and its implications in Indonesia</p> <p>This session will focus on the latest trends and updates in global tax treaties, with a specific emphasis on Indonesia and the Asia-Pacific region. The panel discussion will include also latest issue on beneficial ownership, landmark tax disputes, and recent developments of the Pillar 2. The session will also discuss the latest developments of tax and technology.</p> <p>Panelist:</p> <ul style="list-style-type: none">• SPONSOR• Ichwan Sukardi – Managing Partner – Tax, RSM Indonesia.• Jul Seventa Tarigan – ADARO Indonesia *)• Rachel Saw – Head of IBFD Asia Pacific• Jaap Zwaan – Managing Director of Alvarez Marshal Indonesia (Chair of the session)
17.00 – 17.10	<p>Closing of the Seminar</p> <ul style="list-style-type: none">• Congratulatory remarks from IFA APAC Chair.

Last year speakers and sponsors:

 **International Fiscal Association**
Indonesia Branch



Registration link
https://bit.ly/IFAIndonesia_Seminar2024

Information :
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THE 12th IFA INDONESIA ANNUAL INTERNATIONAL TAX SEMINAR

Tuesday and Wednesday, 10 and 11 December 2024 - 08.00 - 17.30
Financial Hall Graha CIMB Niaga, Jl. Jendral Sudirman Kav. 58

Keynote Speakers



Mekar Satria Utama SE, MP, Acc.
Director of International Taxation
DGT



Guglielmo Maisto
President of International
Fiscal Association



Ichwan Sukardi
IFA Indonesia Chairman

Opening Remark

Chair of session



Elviana Riyanto
TP Partner - PB Taxand



Bobby Saverio
Tax Advisor - Taxprime



Christine Tjen
Universitas Indonesia



Jaap Zwaan
Partner KPMG Indonesia



Salil Goyal
RSM Indonesia

Conference Program & Speakers

- The Latest Updates on Pillar 2
- International Tax and Anti-Avoidance Policy Updates
- Past and Future of Tax Disputes
- Transfer Pricing
- Pillar 1 Updates
- General Tax Policy Updates - WIN SESSION
- Recent Updates on Taxation of Global Mobility - YIN SESSION
- Recent Update on UN Model Convention
- International Tax Developments, Tax Treaties: Trends, Updates, and The Future of International Tax Planning in the Post-BEPS Era



Junya Toya
National Tax
Agency of Japan



Dewi Tamara
KPMG Indonesia



Norazlin HJ ABD Jalil
Marketing Director
Hans Advisory & Trust Co Ltd



Romi Irawan
Transfer Pricing Leader &
Senior Advisor, DDT



Luis Coronado
EY Global Tax Controversy
Leader



Nico Derksen
Director of International
Tax Management Pte Ltd



Diane Ring
Professor of Law and the Dr. Thomas F.
Carney Distinguished Scholar, Boston
College Law School - USA



You Lee Jung
Partner
DR & Aju LLC



Melani Dewi Astuti
Fiscal Policy Agency
Ministry of Finance, Indonesia



Prof. Clemence Garcia
Gakushuin University
Japan



Anne Quenedey
Senior Counsel Slatine
Hongkong Law firm



Wahyu Nuryanto
Transfer Pricing Partner
MUC Consulting



Jul Seventa
Adara Indonesia



Balim Boerman
Tax Partner
Deloitte Indonesia



Pande Putu Oka K.
Fiscal Policy Agency
Ministry of Finance, Indonesia



Prof Kees van Raad
International Tax Centre
Leiden, The Netherlands



Auaychai Sukawong
Tax Partner
EnDepth Advisory - Thailand



T Qivi Hadi
Tax Partner
RSM Indonesia



Permana Adi Saputra
Managing Partner
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Bayu Rahmat Rahayu
TP Compliance and International
Tax Advisor - Tax Prime



Iwan Ho
Partner
KPMG Indonesia



Mr. Koichi Funatani
Partner
PwC Japan

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