

Effective Tax Risk Management Strategies to Minimize Tax Exposure



Faculty Directors



Prijohandojo Kristanto

*Chairman
PB Taxand Indonesia*



Charles Setia Oetomo

*Partner
Deloitte Tax Solutions*



Sri Wahyuni Sujono

*Managing Partner
SF Consulting*



Henrietta Kristanto

*Tax Partner
PB Taxand Indonesia*



Hartiadi B. Santoso

*Partner
Grand Thornton*

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FACULTY DIRECTORS



Prijohandojo Kristanto

*Chairman
PB Taxand Indonesia*

Prijohandojo is the chairman of PB Taxand. With 40 years experience of local and international tax, Prijohandojo has earned the trust of a growing number of clients by providing an objective and independent counsel to local and multinational firms on the full range of taxation including international tax planning, merger and acquisition consultancy and investment structuring matters.

Prijohandojo is the chairman of supervisory board with the Indonesian Tax Consultants Association and the vice chairman of the tax committees of Indonesian chambers of commerce for the period of 2010-2015. He serves as the honorary treasurer of the Singapore chamber of commerce and member of the Supervisory Board of Certified Wealth Managers Association. He is an active participant in forums and discussion related to Indonesia's tax reform initiatives. As an international tax practitioner, Prijohandojo is frequently appointed as a speaker in significant national and international tax conferences and is a regular contributor to technical journals on Indonesian tax issues.



Charles Setia Oetomo

*Partner
Deloitte Tax Solutions*

Charles is a Partner in Deloitte Tax Solutions in Jakarta, Indonesia and heads the indirect taxation/customs and global trade group and IFRS tax team, as well as the real estate and telecommunication and media industry. Prior to joining Deloitte, he served other Big Four accounting and consulting firms as an external auditor. He has extensive experience in serving multinational and large national clients in a broad range of industries.

Charles has been involved in various tax advisory, restructuring, merger and acquisition, and strategic planning projects, as well as dispute resolution and compliance cases. His advisory roles have covered a broad range of tax issues in areas from Indonesian domestic to cross-border tax issues. He is a Licensed Indonesian Tax Consultant and a Registered Tax Court Attorney, having graduated with a Bachelor of Finance and Accountancy degree, and he is also a member of the Indonesian Tax Consultant Association.



Sri Wahyuni Sujono

*Managing Partner
SF Consulting*

Sri Wahyuni Sujono is the managing partner of SF Consulting. She is a certified Tax Attorney, Tax Consultant and holds a Brevet C – the highest working license qualification. Sri is also a Chartered Financial Consultant (ChFC) and a qualified lawyer. She has over fifteen years of experience of tax consulting with Arthur Andersen and Ernst and Young Indonesia. Sri is experienced in serving a large variety of clients, both national and multinational on areas such as tax-structured derivatives, tax planning, and tax restructuring. Some of her most notable clients include: Samsung Electronic Indonesia (SEIN), Samsung Telecommunication Indonesia (STIN), Indosat, Bank of Tokyo-Mitsubishi, Astra Credit Company (ACC), Adira Group, BASF, Mitsubishi Group, Anugerah Group and Mandarin Oriental Hotel.

Besides her role in SF Consulting, Sri is also active in various organizations relating to the tax and business environment. She is the Vice Chairman of the Taxation Committee at the Indonesian Chamber of Commerce (KADIN), the Head of Foreign Affairs in the Indonesian Tax Consultant Association (IKPI) and sits in the Board of Experts in the Indonesian Chinese Association (INTI). She has also had experience in lecturing for the Asia-Pacific Senior School of Andersen Worldwide and Indonesian Tax Planning at the Singapore College of Insurance for the Chartered Financial Consultant (ChFC) program. She also lectured at BINUS University on the Diploma Program for Financial Planners. Furthermore, she is a speaker at various tax seminars, most recently in the Indonesian Entrepreneur's Association (APINDO). Sri graduated with a Business Administration degree from the University of Wisconsin-Madison, USA.

Effective Tax Risk Management Strategies to Minimize Tax Exposure

FACULTY DIRECTORS



Henrietta Kristanto

*Tax Partner
PB Taxand*

Henrietta is based in Taxand Indonesia where she is one of the partners PB Taxand. With 12 years' experience in taxation, Henrietta has earned the trust of a growing number of clients ranging from service, manufacturing, real estate, banking, and SME industry by providing Tax Planning, Tax Restructuring, Tax Compliance, Individual Tax, Compensation & Benefit, as well as Payroll Outsourcing/ Employment Tax services.

As a tax practitioner, Henrietta is frequently appointed as a speaker in noteworthy national and international tax conferences and is a regular lecturer at post graduate program Gajah Mada University, Indonesia. Henrietta is an active member of several communities and association such as Toastmasters International, Indonesian Tax Consultant Associations, Principia Coaching Community, SME Committee of American Chamber of Commerce in Indonesia and Certified Wealth Managers Association (CWMA) where she earned her Certified Wealth Manager title.



Hartiadi B. Santoso

*Partner
Grand Thornton*

Hartiadi is a Partner in Grand Thornton in Jakarta, Indonesia. He has more than 18 years experiences in tax consulting including five years as a tax partner at Deloitte. In particular, he has an in-depth knowledge of national and cross-border issues and risks.

Hartiadi has served a broad range of multinational companies, including manufacturing and consumer products companies. He has broad experience in strategic planning for multinational companies. He has also performed substantial work on M&A, tax due diligence reviews to identify tax exposures, and provides clients with optimum solutions and alternatives to minimize the potential tax exposures.

Hartiadi is a Licensed Tax Court Attorney and also the author of the best-selling book "*Indonesian Tax Guidelines for Executives*". Having graduated with a Bachelor of Accountancy, he received Certification on Indonesian Tax Brevet and also Indonesian Customs Expert.

Effective Tax Risk Management Strategies to Minimize Tax Exposure

EXECUTIVE SUMMARY

Program:	Effective Tax Risk Management Strategies to Minimize Tax Exposure	Early Bird 1 (Register & pay by 12 Feb 2013):	US\$2,150
Dates:	27 March - 28 March 2013 (2 days)	Early Bird 2 (Register & pay by 12 Mar 2013):	US\$2,350
Location:	Hotel Mulia Jakarta	Regular Tuition Fee:	US\$2,450

Group discount of 10% for 2nd participants from the same organization
For limited time only by 12 March 2013, registration for 3 participants, the 4th participant will receive a complimentary seat (one discount scheme apply).

Program Essence: This highly interactive two-day executive program is designed for executives who are involved in the taxation of their organization in Indonesia. This program will provide participants with an in-depth knowledge and analysis of the tax issues related to tax risk management in response to a number of corporate tax failures. In this two-day program, the participants will get an **overview of the tax risk management, building the tax control framework** to maximize tax opportunities benefits and mitigate risks, and **strategic tax planning**. In this taxation excellence program, you will receive insights on **offshore tax haven** and its relevance to Indonesia, **Beneficial Ownership, transfer pricing legislation** in Indonesia, and also **managing your company's audits efficiently** from tax and legal perspective.

Led by Leading Practitioners in Indonesia Taxation, you will discover **ways to avoid tax dispute and how to settle it amicably without facing legal issues when it happened**. You also will be engaged in concepts and group discussions on real world tax planning case studies in Indonesia. **At the end of the 2-day program, you will have a clear understanding on Indonesia's tax legislation while at the same time able to manage tax risk and creating values to the organization within significant resource constraints.**

PROGRAM INTRODUCTION

Indonesia is one of the investment target in Southeast Asia. With the power of 250 million people, Indonesia is a potential market for all types of products and services. One of the key challenges for businesses in Indonesia is managing tax obligations and keeping up with the continuous changes on the Indonesia Tax Law.

Indonesia has one of the higher tax regime within South East Asia. In addition, the Indonesian Tax Office has reputation for being collection-driven and inconsistent treatment from time to time. The system's quality has improved considerably in recent years, but corporate tax payers have found that the tax regulations and policies are not always consistent and the time frame to obtain tax rulings is not clear resulting in different perceptions and interpretations. Litigation keeps taking longer as the tax courts are overstretched, and more cases are being appealed to Indonesia's Supreme Court. Therefore, it is crucial for companies to place greater attention and coordination in managing their tax affairs. Companies need to be aware of their tax obligations and proactively focus on good tax governance. Failure to comply with these regulations can often cost companies up to hundreds of millions of dollars.

This highly interactive course will equip participants who are involved in the taxation of their organization with an in-depth knowledge and analysis of the tax issues related to tax risk management in response to a number of corporate tax failures. In this intensive two-day executive program, you will gain insights on what companies need to know in Tax Risk Management, how to build tax control framework to maximize organization' tax opportunities benefits while at the same time mitigate risks. You will also learn how to strategically plan your tax transactions to achieve sustainable performance in financial and tax risks. It is also crucial to find out about Tax Haven and Beneficial Ownership in Indonesia, especially with the effectiveness of Indonesia - Hongkong Tax Treaty. In addition, the experts will share the latest update on Transfer Pricing Legislation, method, documentation, scrutiny, and controversy.

Due to the complexity on Indonesia tax legislation, it is important to find out best practices in managing your audits efficiently from legal and tax perspective and also ways to avoid tax dispute and how to settle it amicably without facing legal issues when it happened. With group discussions on real world tax planning case studies in Indonesia, the program will maximize the benefits of all delegate's experience in a supportive atmosphere. You will have a clear understanding on Indonesia's tax legislation while at the same time able to manage tax risk and creating values to the organization within significant resource constraints.

Program Details and Agenda

WHO WILL BENEFIT MOST

This executive program is designed for Managers, Directors, and Heads dealing with Finance, Tax, Risk, and Strategic Planning. This program is also applicable to Tax Lawyers, Tax Authorities, Accountants, Actuarial Head, Asset Liability Managers, Corporate Treasurers, Chief Operating Officer, Chief Compliance Officers, Financial Controller, Internal and External Auditors, and Project Managers.

LEARNING OBJECTIVES

- What companies need to know about Tax Risk Management
- How to build tax control framework to maximize tax opportunities benefits and mitigate risks
- Achieving sustainable performance in financial and tax risks with Strategic Tax Planning
- Establishment of Offshore Tax Haven and the relevance to Indonesia
- The challenges of Beneficial Ownership and ways to overcome
- Implement effective Transfer Pricing strategies
- Best practices in managing audits efficiently from legal and tax perspective
- Successful tax dispute resolution techniques
- Hear the real world successful and failure tax planning case studies in Indonesia

PROGRAM OUTLINE

DAY ONE - MORNING

Tax Risk Management - What Companies Need to Know

- What is tax risk management?
- Why has tax risk management become increasingly important
- Types of tax risk
- Key pressure and challenges facing companies tax department
- Tax risk management policy

Tax Risk Management in the Compliance Life Cycle

- Compliance principles
- Major compliance risks to be addressed
- Tax authority relationships
- Audit and enquiry management
- Audit resolution
- Tax amnesties
- Tax reporting procedure and provisions

DAY ONE - AFTERNOON

Building Tax Control Framework to Maximize Tax Opportunities Benefits and Mitigate Risks

- What is tax control?
- Area and risks
- Overview of the building blocks
- The roles of stakeholders
- Tax operations and risks
- Tax accounting and reporting
- Tax compliance

Strategic Tax Planning - Achieving Sustainable Performance in Financial and Tax Risks

- Integrity compliance and reporting
- Enhancing shareholder value
- Business partnering
- Influencing tax policy
- Controlling and managing risks
- Balancing between managing tax risk and creating value within significant resource constraints
- Leading practices in implementing efficient and effective tax management processes
- Building blocks that company need to put in place to achieve a risk-value balance

Program Details and Agenda

PROGRAM OUTLINE

DAY TWO - MORNING

Offshore Tax Haven and The Relevance to Indonesia

- Characteristic of tax haven countries
- Secrecy jurisdictions for companies operating in Indonesia
- What laws or regulations can rein in tax evasion?
- The impacts of tax haven to Indonesia
- What the tax office is seeing and doing?
- Signing of tax treaty with tax haven countries

Beneficial Ownership

- Beneficial ownership and control: the challenges
- Corporate vehicles and their potential for misuse
- Disclosure of beneficial ownership of corporate vehicle
- Enforcement and intervention
- Cross-border cooperation and information sharing

Effective Transfer Pricing Strategies

- Transfer pricing legislation and latest update
- Transfer pricing method and documentation requirement
- Royalty and intra-group services
- Transfer pricing scrutiny and controversy experience
- Alternative resolutions to the transfer pricing audit dispute

DAY TWO - AFTERNOON

Best Practice in Managing Audits Efficiently From Legal and Tax Perspective

- Pre-audit best practices and due diligence
 - ✓ Statute of limitation
 - ✓ Conditions triggering tax audit
 - ✓ Legal products of tax audit
 - ✓ Corporate Governance on tax audits
- Managing ongoing audit
 - ✓ Strategic information management and disclosure
 - ✓ Developing strong relationship with tax authorities
 - ✓ Developing tax authority intelligence
 - ✓ Possibilities for settlement negotiation
- Tackling post-audits issues
 - ✓ Remedial actions for exposures created due to audit

Achieving Successful Tax Dispute Resolution

- Situations prompting tax dispute
- Objection and appeal process
- Judicial review by Supreme Court
- Tax penalties and sanctions
- Best practices to settle tax dispute without facing legal risks

Success and Failure cases of Tax planning: Case study of Indonesian Companies

REGISTRATION PAGE

Booking Contact (Approving Manager) Mr/Mrs/Ms: _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____
Organisation: _____
Address: _____
Postal Code: _____

I would like to receive more information on hotel accommodation using Clariden Global corporate rate.

Please Register the following participant(s) for this Program:

1st Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
2nd Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
3rd Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____
4th Participant Name (Mr/Mrs/Ms): _____
Job Title: _____ Department: _____
Telephone: _____ Fax: _____
Email: _____ Date of Birth: _____

PROGRAM FEES

1ST EARLY BIRD FEE: US\$2,150
(Registration and payment must be received by 12 February 2013)

2ND EARLY BIRD FEE: US\$2,350
(Registration and payment must be received by 12 March 2013)

REGULAR FEE: US\$2,450

GROUP DISCOUNT: For 2 registrations from the same company and billing source, the 2nd participant enjoys a 10% discount.

For registrations of 3 from the same company and billing source, the 4th participant receives a complimentary seat. One discount scheme applies per company.

Important Notice: Payments are required with registration and must be received prior to the Course to guarantee your place.

PAYMENT METHODS

BY CHEQUE / BANK DRAFT :

Made payable to Clariden Global Pte Ltd and mail to: 3 International Business Park, #04-31, Nordic European Centre, Singapore 609927.

BY TELEGRAPHIC TRANSFER TO:

Bank Name: **DBS BANK**
Bank Branch Code: **027**
Bank Address: **6 Shenton Way, DBS Building, Singapore 068809**
Bank Account No: **27-903583-8**
Bank Account name: **Clariden Global Pte Ltd**
Bank SWIFT Code: **DBSSSGSG**

Please note that all bank charges are to be borne by participants. Please ensure Clariden Global receives the full invoiced amount.

Note: Please include invoice number on all payment types and your company's name in your payment instructions for our reference.

CREDIT CARD:

To make payment by credit card, please call our client services hotline at +65 6899 5030.

4 WAYS TO REGISTER



Email: admissions@claridenglobal.com



Fax: +65 6567 4328



Call: +65 6899 5030



Website: www.claridenglobal.com

DATE AND LOCATION

This executive program will be held at:

Hotel Mulia Jakarta

27– 28 March 2013

Jl. Asia Afrika Senayan, Jakarta 10270, Indonesia

Tel : +62 21 574 7777

Fax : +62 21 574 7888

Website : <http://hotelmulia.com> Email : info@hotelmulia.com

The fee for this two-day executive program includes all written materials, lunch and refreshments.

HOW TO REGISTER AND PAY

An invoice and registration confirmation will be sent within 7 days, please contact us if you have not heard from us within 7 days. Payment can be made by credit card, by bank transfer or by cheque made payable to "Clariden Global Pte Ltd.

ALL PAYMENTS MUST BE RECEIVED IN ADVANCE OF THE EVENT.

ACCOMMODATION

Accommodation is not included in the program fee but you will be entitled to use our corporate rate for your accommodation. Information will be sent along with your registration confirmation.

SPONSORSHIP

INTERESTED IN PROMOTING YOUR ORGANIZATION TO OUR PARTICIPANTS

For more information on sponsorship, tabletop displays & insert opportunities, please contact us at 6899 5030.

CANCELLATIONS AND SUBSTITUTIONS

Once we have received your booking, the place(s) are confirmed. No refunds will be made for any cancellations, however, program credits of equivalent value only applicable for Clariden Global events will be provided. Credits can only be redeemed for 1 program and is valid for only one (1) year from date of issue.

Substitution with a qualified candidate is allowed by providing at least 5 working days of advance notice to Clariden Global. One time substitution is allowed with no charges. Subsequent substitutions will be charged 10% admin fee.

ALL CANCELLATIONS MUST BE RECEIVED IN WRITTEN FORM

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ENQUIRIES: If you have any queries about registration or payment please do not hesitate to contact our client services department on +65 6899 5030.

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