

GOOD CORPORATE GOVERNANCE EFFECTIVENESS MECHANISM, SPECIAL RELATIONSHIP TRANSACTIONS, AND LEVERAGE ON TAX AGGRESSIVENESS

Haris Prasetyo Hadi Santoso^{1*}, Wiwik Utami^{2}**

^{1,2}*Faculty of Economics & Business, Universitas Mercu Buana*

* 55520110056@student.mercubuana.ac.id ** wiwik@mercubuana.ac.id

ABSTRACT

This study examines how effective good corporate governance, control of related party transactions, and leverage are in reducing tax aggressiveness. The research methodology involves cross-sectional and time-series analysis of manufacturing companies listed on the IDX from 2017-2021. Through purposive sampling, 200 observational samples were collected and tested using E-views 12, which produced a random effect model as the best regression model. The findings indicate that good corporate governance with institutional ownership proxies, audit committee activities, and the proportion of independent commissioners did not significantly reduce tax aggressiveness. Leverage with debt-equity ratio proxies also did not demonstrate a significant effect. However, related party transactions had a significant effect in increasing management opportunities to carry out tax aggressiveness. If good corporate governance implementation is not maximized and there is unfairness in related party transactions, it may indicate aggressive tax avoidance.

Keywords: *tax aggressiveness, institutional ownership, audit committee activity, independent commissioners, related party transactions*

This article is licensed under [CC BY-SA 4.0](https://creativecommons.org/licenses/by-sa/4.0/) 

INTRODUCTION

Aggressive tax planning actions can bring companies to face tax risks in the future. Tax risk is the uncertainty of future corporate tax payments (Guenther et al., 2019). This uncertainty affects cash flows in the form of additional costs, such as the risk of sanctions and fines by the tax authorities by paying debts accompanied by interest and fines (Bauer & Klassen, 2014). Investors also viewed tax aggressiveness negatively. This is because it has tax risks, and sustainability, and can reduce company value due to detection risks and increased costs due to tax aggressiveness such as supervisory costs, tax planning, loss of reputation, and legal potential (Prastiwi & Walidah, 2020). There have been several cases due to tax aggressiveness, such as the companies PT Bentoel Internasional Investama (2019), PT Japfa Comfeed Indonesia Tbk (2019), and PT Adaro Energy Tbk. (2019) who do tax avoidance by transfer pricing. For this action, the company must pay the tax owed as well as sanctions and fines that must be paid.

Shareholder and stakeholder control over tax aggressiveness that is detrimental to the company is the implementation of good corporate governance (GCG). Corporate governance as a system that regulates and controls companies as taxpayers that connects various stakeholders in the company that determines the direction of company performance (Sarpingah & Purba, 2019). GCG will provide effective protection to shareholders for the investment invested to produce reasonable, appropriate and efficient returns, and ensure that management acts in the interests of the company (Mahrani & Soewarno, 2018). Corporate governance has an impact on management decisions for managers' tax avoidance actions, whether the level of tax avoidance is high, so it is necessary to monitor the average level of tax avoidance

(Armstrong et al., 2015). GCG can be measured using institutional ownership proxies, audit committees and independent commissioners (Yusuf et al., 2019).

In addition to creating good corporate governance, corporate action is carried out by shareholders, namely forming a group holding company which causes special relationship transactions in the form of transfer pricing which can result in unfair transactions (Yudawirawan et al., 2021). Intragroup transactions between related companies have implications for transfer pricing practices (Beebeejaun, 2019). Determination of transfer pricing on related parties related to tax compliance because it determines the profits of legal entities in multinational companies, transfer prices can be used to minimize taxes (Hummel et al., 2019).

In running its business, the company also requires additional funds to develop its business. One source of funding is from bank loans. The many credit facility programs offered by the Bank have resulted in new problems in the world of taxation, namely interest costs or financial costs will become larger so that a company's fiscal profit will decrease. (Gloria & Apriwenni, 2020) states that the size of leverage will affect decisions in conducting related transactions with the aim of reducing the company's tax burden. (Gloria & Apriwenni, 2020) concluded that capital structure affects company value where additional debt will reduce the effective cost of debt and tax payments (tax deductible expense).

Previous research related to GCG, Leverage, and related transactions on tax aggressiveness showed inconsistent results. (Gloria & Apriwenni, 2020) shows that institutional ownership and audit committees have a positive and significant effect on tax aggressiveness, the proportion of independent commissioners and audit quality has a negative and significant effect on tax evasion, while leverage is not taken into account as a determinant of tax evasion in Indonesia, (Gloria & Apriwenni, 2020) GCG has a significantly positive effect on tax aggressiveness and leverage has a negative and statistically significant effect on tax aggressiveness. (Yusuf et al., 2019) shows that institutional ownership, and audit committees and independent commissioners have no effect on the rise and fall of aggressive tax actions. Meanwhile, good corporate governance jointly influences the increase in aggressive tax actions. (Waluyo, 2019) explains that the proportion of the board of commissioners has a negative effect on the amount of tax evasion while institutional ownership shows no effect. (Nilasari & Setiawan, 2019) states that independent commissioners affect the company's effective tax rate, while audit committees and related transactions show an influence on aggressive actions by looking at the company's effective tax rate. (Bulutoding, 2016) explains that the audit committee has a significant effect on aggressive tax actions, while independent commissioners and institutional ownership show a significant effect. (Rambe & Utami, 2021) states that leverage has no effect on tax aggressiveness.

The update or novelty in this study is to extend the research observation period for the last 5 years, namely from 2017 to 2021 which in that year described the conditions before the Covid-19 pandemic, during the Covid-19 pandemic, and after the Covid-19 pandemic. The manufacturing company was chosen because manufacturing companies have many transactions, the calculation of cost of production and cost of goods sold is more complex so as to enable affiliate transactions or special relationships to meet the needs of raw materials and supply of finished goods. Manufacturing companies also have high asset values because they have fixed assets in the form of factories, machines and production equipment, besides

that they need a lot of working capital to meet production and operational needs, which can be sourced from equity and bank loans.

METHOD

The study uses a quantitative approach, by examining the effect of the independent variables institutional ownership (INST), audit committee activity (KOMITE), the proportion of independent commissioners (IND), special relationship transactions (RPHI), and leverage (DER) on the dependent variable, namely tax aggressiveness (CETR). Secondary data is taken from financial reports and annual reports of manufacturing companies listed on the Indonesia Stock Exchange (IDX) in 2017-2021. Sampling used a purposive sampling method which produced 400 observation samples. The data obtained were then analyzed using the panel data analysis model using the help of the Eviews version 12 software program to decide on the best regression model, namely the Chow test, Hausman test, and Lagrange multiplier test as well as the classical assumption test

The regression model of this study is as follows:

$$CETR = \alpha_0 + \beta_1INST + \beta_2INDP + \beta_3KOMITE + \beta_4RPHI + \beta_5DER + \varepsilon$$

Where:

CETR = Cash Effective Tax Rate.

INST = Institutional ownership.

INDP = Percentage of independent commissioners.

COMMITTEE = Frequency of audit committee meetings

RPHI = Ratio of Special Relationship Transactions

DER = Leverage Ratio

α = Regression Equation Constant

$\beta_1, 2, 3, 4, 5$ = Regression Coefficient

ε = Error term

RESULTS AND DISCUSSION

Table 1. Descriptive Statistical Test Results

	CETR	INST	KOMITE	IND	DER	RPHI
Mean	0.228146	70.50418	6.645000	0.419464	0.793873	0.035722
Median	0.236777	74.67457	6.000000	0.400000	0.556401	0.009599
Maximum	0.399924	99.71122	19.000000	0.833333	3.513441	0.350472
Minimum	0.007067	0.364902	1.000000	0.000000	0.067269	1.91E-06
Std. Dev.	0.070173	20.15143	4.228282	0.104670	0.655696	0.063543
Observations	200	200	200	200	200	200

Source: Results of Data Processing with Eviews 12 (2023)

Tax aggressiveness is measured using a cash effective tax rate (CETR) proxy which shows an average of 0.22, illustrating that the average tax paid is 22% of pre-tax profit. The maximum value of 0.39 is found in PT. Unggul Indah Cahaya Tbk and PT. Japfa Comfeed Indonesia Tbk, and the minimum value of 0.007 is found in PT Indo Acitama Tbk. The results show that manufacturing companies registered on the IDX during the 2017-2021 period paid taxes

according to the rates set by the government, namely in accordance with Law Number 36 of 2008 Article 17 Paragraph (1) division b, the corporate income tax rate is 25% and for companies with 40% of their shares traded on the IDX get a 5% tariff reduction facility.

Institutional ownership (INST) has an average value of 70.50 with a maximum value of 99.71 found in PT. Fajar Surya Wisesa Tbk, and the minimum value of 0.36 is at PT. Intan Wijaya International Tbk, with a standard deviation of 20.15. The results show that most of the manufacturing companies listed on the IDX during the 2017-2021 period show institutional ownership (INST) of 70%. The proportion of shares owned by institutions above 50% shows that company ownership is also owned by other institutions or institutions.

Audit committee activity (KOMITE) shows an average committee meeting activity of six times a year. The most meeting activities were nineteen times at PT. Aneka Gas Industri Tbk, and meeting activities at least at PT Darya Variao Laboratoria Tbk which only held one audit committee meeting. Of the 200 samples observed, 137 samples showed meeting activities 4 or more times a year, and 63 samples showed meeting activities less than 3 times a year. The results above show that 68% of manufacturing companies listed on the IDX in 2017-2021 have met the requirements according to Financial Services Authority Regulation No. 55 /POJK.04/2015 Article 13.

The average percentage of independent commissioners (IND) is 40%, the highest ownership is 83% in PT. Unilever Indonesia Tbk. This shows the percentage of independent commissioners in accordance with the regulations of the Financial Services Authority Regulation No.33/POJK.04/2014, Article 20 paragraph 3 that independent commissioners are set at least 30% (thirty percent) of the total number of members of the board of commissioners.

RPHI shows an average value of 0.035. The results of this study show that there are companies that have a high ratio of related receivables to assets, namely PT. Wijaya Karya Beton Tbk in 2020 and 2021 by 30% and 35%, in which year CETR PT. Wijaya Karya Beton Tbk is also low, namely 4% in 2020 and 6% in 2021. Apart from that, PT. Arwana Citra Mulia Tbk in 2021 which has an RPHI of 25% shows a CETR of 1%. The results show that there are indications of aggressive tax avoidance through special relationship transactions.

Leverage (DER) shows an average of 0.79 with a maximum value of 3.51 at PT. Copper Mulia Semanan Tbk and a minimum value of 0.067269 is at PT. Supreme Cable Manufacturing and Commerce Tbk (SCCO). Total debt compared to total capital is 0.8 and the highest DER value is 3.5 which is still in accordance with the regulations of the Director General of Taxes Number 25/PJ/2017 which is set at 4:1.

To get the best regression model, the chow-test, Hausman-test, and Langrage multiplier test were carried out. Based on the results of the chow-test, the probability value of the F test is $0.0000 < 0.05$ and the chi-square is $0.0000 < 0.05$ so the model estimation approach follows the fixed effect model.

Table 2. Chow test results
Redundant Fixed Effects Tests

Effects Test	Statistic	d.f.	Prob.
Cross-section F	2.763889	(39,155)	0.0000
Cross-section Chi-square	105.587284	39	0.0000

Source: Results of Data Processing with Eviews 12 (2023)

Table 3. Hausman Test Results
Correlated Random Effects - Hausman Test

Test Summary	Chi-Sq. Statistic	Chi-Sq. d.f.	Prob.
Cross-section random	4.217540	5	0.5185

Source: Results of Data Processing with Eviews 12 (2023)

The results of the Hausman test show that the probability value in the random cross-sectional test is 0.5185, which means it has a significance level greater than the 95% level of significance ($\alpha = 5\%$) so it can be concluded that the random effect model method is better than the fixed effect model method.

Table 4. Lagrange Multiplier Test Results
Lagrange Multiplier Tests for Random Effects

Null Hypotheses: No effects

Alternative hypotheses: Two-sided (Breusch-Pagan) and one-sided (all others) alternatives

	Test Hypothesis		
	<i>Cross-section</i>	<i>Time</i>	<i>Both</i>
Breusch-Pagan	23.24374 (0.0000)	12.01629 (0.0005)	35.26003 (0.0000)

Source: Results of Data Processing with Eviews 12 (2023)

From the results of the output above it can be seen that the value of prob. Breach-pagan (BP) of 0.0000 (in the third column, namely "Both") indicates the random effect model is suitable. Based on the Chow test, Hausman test, and Langrage multiplier test, it can be decided that the best testing model for the regression equation is using the random effect model. The estimation results for the random effect model are shown in the following table:

Table 5. Panel Data Regression Results

Dependent Variable: CETR				
Method: Panel EGLS (Cross-section random effects)				
<i>Variable</i>	<i>Coefficient</i>	<i>Std. Error</i>	<i>t-Statistic</i>	<i>Prob.</i>
DER	0.006450	0.009490	0.679675	0.4975
INST	0.000164	0.000321	0.510898	0.6100
IND	-0.014401	0.055263	-0.260592	0.7947
KOMITE	-0.002156	0.001590	-1.356550	0.1765
RPHI	-0.371329	0.100021	-3.712519	0.0003
C	0.245082	0.033293	7.361363	0.0000

Source: Results of Data Processing with Eviews 12 (2023)

The regression equation generated based on the above test is as follows:

$$\text{CETR} = 0.245082 + 0.000164 \text{ INST} - 0.002156 \text{ COMMITTEE} - 0.014401 \text{ IND} + 0.006450 \text{ DER} - 0.371329 \text{ RPHI} + \varepsilon$$

Next is the classical assumption test on the selected regression model. The table below shows the correlation value between the independent variables is less than 0.80, so multicollinearity symptoms are not detected.

Table 6. Multicollinearity Test Results

	DER	INST	KI	KOMITE	RPHI
DER	1.000000	0.029627	0.252838	-0.019327	0.130959
INST	0.029627	1.000000	0.109931	-0.056457	-0.047123
IND	0.252838	0.109931	1.000000	0.016448	0.011090
KOMITE	-0.019327	-0.056457	0.016448	1.000000	0.385603
RPHI	0.130959	-0.047123	0.011090	0.385603	1.000000

Source: Results of Data Processing with Eviews 12 (2023)

The white test results show a p-value of 0.2553 > 0.05. Thus it can be concluded that there are no symptoms of heteroscedasticity. The results of the heteroscedasticity test in this study can be seen in the following table:

Table 7. Heteroscedasticity Test Results

Heteroskedasticity Test: White			
Null hypothesis: Homoskedasticity			
F-statistic	1.203702	Prob. F(20,179)	0.2558
Obs*R-squared	23.70961	Prob. Chi-Square(20)	0.2553
Scaled explained SS	53.20618	Prob. Chi-Square(20)	0.0001

Source: Results of Data Processing with Eviews 12 (2023)

Test the hypothesis with the t-statistical test the significance level (α) used is 5% (0.05) with the following results:

Table 8. Statistical Test Results T

Variable Relations	β	prob	Results
INST → CETR	0.000164	0.6100	Positive Influence, H1 is rejected
KOMITE → CETR	-0.002156	0.1765	Negative Influence, H2 is rejected
IND → CETR	- 0.014401	0.7947	Negative Influence, H3 is rejected
RPHI → CETR	- 0.371329	0.0003	Negative Influence, H4 is accepted
DER → CETR	0.006450	0.4975	Positive Influence, H5 is rejected

Source: Results Processed by Researchers (2023)

Institutional ownership has no significant negative effect on tax aggressiveness. The results of this study are not in line with previous research (Sunarto et al., 2021; (Vanesali & Kristanto, 2020) which shows that the mechanism of good corporate governance with institutional ownership proxies has a significant effect on reducing tax aggressiveness. The effectiveness of institutional ownership in reducing the level of tax aggressiveness in manufacturing companies listed on the IDX in 2017-2021. The average CETR of 22% shows that it is within a reasonable range according to tax regulations in Indonesia with a tax rate for companies of 25% of profits generated, and a 5% reduction in tariff facility if 40% of its shares are traded on the Indonesian Stock Exchange. The results of this study corroborate research terdahulu (Sunarto et al., 2021; (Vanesali & Kristanto, 2020), which shows the application of good corporate governance (GCG) mechanisms with institutional ownership proxies does not affect significantly in reducing tax aggressiveness.

Audit committee activity has no significant negative effect on tax aggressiveness. The results of this study are not in line with research (Annisa & Kurniasih, 2012; Hanna & Haryanto, 2017; Mustika et al., 2018; Nugroho & Firmansyah, 2018; Rahmayanti et al., 2021b; Subarnas & Gunawan, 2019b; Vanesali & Kristanto, 2020). The effectiveness of the audit committee in reducing tax aggressiveness does not appear to be significant because the average CETR of manufacturing companies listed on the IDX is 22% which is still within a reasonable range based on tax regulations in Indonesia. The results of this study are in line with Meanwhile (Cahyono et al., 2016; Gloria & Apriwenni, 2020; Kusuma & Firmansyah, 2018; Migang & Rivia Dina, 2022; Novitasari et al., 2017; Sarpingah & Purba, 2019; Wayan, 2022; Yusuf et al., 2019) the results of their research show that the implementation of good corporate governance (GCG) mechanisms by proxy audit committee activity does not show a significant effect on tax aggressiveness. Manufacturing companies listed on the IDX in 2017-2021 show that 68% of companies have met the formal legal requirements according to Financial Services Authority Regulation No.55/POJK.04/2015 Article 13 which requires the audit committee to hold regular meetings of at least 1 (one) times in 3 (three) months or meeting activities are held six times in one year. The audit committee will run effectively if it carries out its duties properly. The goal is that GCG can be applied, especially in tax policies taken in accordance with applicable regulations, and tax aggressiveness can be controlled.

The proportion of independent commissioners has no significant negative effect on tax aggressiveness. The results of this study are not in line with research (Ariawan & Setiawan, 2017; Fadli et al., 2016; Gloria & Apriwenni, 2020; Innocent & Gloria, 2018; Nilasari & Setiawan, 2019; Novitasari et al., 2017; Nugroho & Firmansyah, 2018; Sarpingah & Purba,

2019; Subarnas & Gunawan, 2019a; Vanesali & Kristanto, 2020). Manufacturing companies registered with IDX 2017-2021 have formally complied with OJK regulations No.33/POJK.04/2014 Article 20 paragraph 3 which stipulates that independent commissioners are at least 30% (thirty percent) of the total number of members of the board of commissioners, namely with an average the average proportion of independent commissioners is 40%. Even though it has been implemented legally and formally, substantively the independent commissioner has not been seen optimally in carrying out supervisory duties to management, especially in the policy of significant tax aggressiveness. The weak influence of the independent board of commissioners is possible because the board of independent commissioners is dominated by major shareholders, so that the voice of the independent committee is weak, so supervision of tax aggressiveness has not run optimally. The results of this study are in line with research (Annisa & Kurniasih, 2012; Budianti et al., 2018; Cahyono et al., 2016; Gunawan & Kris Resitarini, 2019; Handayani, 2019; Kusuma & Firmansyah, 2018; Migang & Rivia Dina, 2022; Sarpingah & Purba, 2019; Tarmidi et al., 2020; Widuri et al., 2019; Yunistiyani & Tahar, 2017; Yusuf & Khomsiyah, 2019) which shows GCG with a proxy for the proportion of independent commissioners does not show a significant effect against tax aggressiveness.

Leverage has no significant positive effect on Tax Aggressiveness in manufacturing companies listed on the Indonesia Stock Exchange in 2017 – 2021. The results of this study are not in line with previous research by (Apriyani & Harnovinsah, 2019; Ariawan & Setiawan, 2017; K. S. Dewi & Yasa, 2020; Firdayanti & Kiswanto, 2020; Handayani, 2019; Herlinda & Rahmawati, 2021; Kariimah & Septiowati, 2019; Nurhandono & Firmansyah, 2017; Octaviani & Sofie, 2019; Ogbeide, 2017; Ramadani & Hartiyah, 2020; Santini & Indrayani, 2020). The influence of leverage is not significant in this study because leverage (DER) has an average value of 0.79 indicating that the company has complied with the regulations of the Director General of Taxes Number 25/PJ/2017 which stipulates that the maximum DER is 4:1. This lack of leverage can also occur because companies use debt not only for working capital, but companies use debt for long-term investments, so that interest costs are not recorded in only one financial statement period and have little impact on reducing the company's tax burden. There is no effect of leverage on tax aggressiveness in this study, because the research is limited to manufacturing companies that go public. companies that go public with the goal of avoiding bank credit. Companies going public prefer to pay dividends rather than having to pay bank interest. The results of this study are in line with (Aderibigbe, 2018; Budianti et al., 2018; Cahyono et al., 2016; Firmansyah et al., 2021; Gunawan & Kris Resitarini, 2019; Indradi & Setyahadi, 2019; Muti'ah et al., 2021; Rambe & Utami, 2021; Vanesali & Kristanto, 2020) which shows that leverage does not show a significant effect on tax aggressiveness. Although the impact of leverage on tax aggressiveness is low. The owner of the company must remain careful in the use of debt. This can be seen from beneficial ownership, if the use of the debt is not for the company's operational purposes such as for the benefit of affiliates or shareholders, the DGT will make fiscal corrections on interest costs that may not be charged. DGT will proportionate to the interest expense by looking at receivables from affiliates or with special relationships for actual beneficial ownership.

Transactions with related parties have a significant positive effect on tax aggressiveness, where the greater the transaction with special relations, the greater the level of tax

aggressiveness carried out by the company. The results of this study are in line with (Alkawsar et al., 2017; Erawati & Novitasari, 2021; Indradi & Setyahadi, 2019; Kaca, 2020; Kramarova, 2021; Marundha et al., 2020; Muti'ah et al., 2021; Putri & Mulyani, 2020; Ramdhani et al., 2021; Santoso et al., 2021; Sari et al., 2017). Transactions with related parties between affiliated companies or one group can result in a shift in company profits to other companies in the same group, resulting in unfair taxable profits. Transactions of companies that have special relations raise the potential for price manipulation of transactions beyond the fair price (Yudawirawan et al., 2021). Transactions with related parties result in unfair prices, fees or other rewards realized in a business transaction. The results of this study are in accordance with research (Yudi, et, al., 2021) which states that special relationship transfers have a significant effect on the effective tax rate. (Susilawaty, 2020) also states that affiliate company transactions have a significant influence on the effective tax rate.

CONCLUSION

The mechanism of good corporate governance through the existence of institutional ownership has not been able to reduce tax aggressiveness because the monitoring process is only limited to company performance in the form of dividends to be received. The appointment of the audit committee is only to fulfill the required regulations. Independent commissioners cannot reduce tax aggressiveness because they do not have an absolute interest in the company's finances and as an independent party (from outside the company) do not have optimal control because they are not involved intensively in the company's operations. Transactions with special relations between affiliated companies or one group can result in a shift in company profits to other companies so that taxable profits become unfair. Such irregularities are in the form of prices, costs, or rewards or other income realized in a business transaction. The higher the transaction between company groups, the greater the value of transfer pricing. Effectiveness Government regulations regarding the ratio between debt and equity ratios succeeded in reducing tax aggressiveness.

One of the rules made to limit tax aggressiveness through related transactions is the company's obligation to submit a transfer pricing document in accordance with Minister of Finance Regulation (PMK) Number 213/PMK.03/2016 which still needs to be optimized in its implementation. Meanwhile, Regulation of the Director General of Taxes Number 25/PJ/2017 which stipulates a maximum DER of 4:1 needs to be maintained because it is effective in preventing tax aggressiveness. The implementation of GCG should not only be a formality to fulfill OJK requirements, but should be carried out in accordance with the substance of the GCG functions and principles that have been established, so as to minimize the negative impact on the company in the future related to tax risks.

This research is limited to manufacturing companies listed on the IDX and a proxy for measuring the level of tax aggressiveness using only CETR. So that for the development of subsequent research it can expand the research subject and some other measures of tax aggressiveness such as the book tax difference or the development of the CETR model which multiplies income before tax with the applicable tax rate and adds other tax preferences. So that it is expected to produce more comprehensive research.

REFERENCES

- Aderibigbe. (2018). Pengaruh Manajemen Laba, Leverage Dan Likuiditas Terhadap Agresivitas Pajak (studi Pada Perusahaan Pertambangan Yang Terdaftar Di Bei Periode 2012-2016). *Energies*, 6(1), 1–8.
- Alkawsar et al. (2017). Pengaruh Transaksi Afiliasi Perusahaan Terhadap Penghindaran Pajak (Tax Avoidance). *Jurnal Online Mahasiswa (JOM) Bidang Akuntansi*, 1, 1–12.
- Annisa, N. A., & Kurniasih, L. (2012). Pengaruh corporate governance terhadap tax avoidance. *Jurnal Akuntansi Dan Auditing*, 8(2), 123–136.
- Apriyani, A., & Harnovinsah, H. (2019). The Effect of Good Corporate Governance Principles Application, Corporate Social Responsibility Disclosure, and Leverage Ratio on Tax Aggressiveness. *International Journal of Business and Management Invention (IJBMI) ISSN*, 8(07), 10–16.
- Ariawan, i M. A. R. A., & Setiawan, P. E. (2017). Pengaruh Dewan Komisaris Independen, Kepemilikan Institusional, Profitabilitas Dan Leverage Terhadap Tax Avoidance. *E-Jurnal Akuntansi*, 18(3), 1831–1859.
- Armstrong, C. S., Blouin, J. L., Jagolinzer, A. D., & Larcker, D. F. (2015). Corporate governance, incentives, and tax avoidance. *Journal of Accounting and Economics*, 60(1), 1–17. <https://doi.org/10.1016/j.jacceco.2015.02.003>
- Bauer, A. M., & Klassen, K. J. (2014). *Estimating Downside Tax Risk: Exploration of Unfavorable Tax Settlements*. 56.
- Beebeejaun, A. (2019). The fight against international transfer pricing abuses: a recommendation for Mauritius. *International Journal of Law and Management*, 61(1), 205–231. <https://doi.org/10.1108/IJLMA-05-2018-0083>
- Budianti, I., Nazar, M. R., & Kurnia. (2018). Pengaruh Return On Asset (ROA), Leverage (DER), Komisaris Independen dan Ukuran Perusahaan Terhadap Agresivitas Pajak (Studi Kasus pada Perusahaan Bumn yang Terdaftar di Bursa Efek Indonesia Periode 2012-2016). *E-Proceeding of Managemen, Vol.5(No.2)*, 2368–2375.
- Bulutoding, L. (2016). Analysis of aggressive tax in terms of good corporate governance company listed on the Indonesia stock exchange (IDX). *Man in India*, 96(11), 4455–4466.
- Cahyono, D. D., Andini, R., & Raharjo, K. (2016). Pengaruh komite audit, kepemilikan institusional, dewan komisaris, ukuran perusahaan (Size), leverage (DER) dan profitabilitas (ROA) terhadap tindakan penghindaran pajak (tax avoidance) pada perusahaan perbankan yang listing BEI periode tahun 2011--2013. *Journal Of Accounting*, 2(2).
- Dewi, K. S., & Yasa, G. W. (2020). The Effects of Executive and Company Characteristics on Tax Aggressiveness. *Jurnal Ilmiah Akuntansi Dan Bisnis*, 15(2), 280. <https://doi.org/10.24843/jiab.2020.v15.i02.p10>
- Erawati, T., & Novitasari, A. (2021). Pengaruh Transaksi Hubungan Istimewa, Ukuran Perusahaan, Tingkat Hutang Perusahaan dan Profitabilitas Terhadap Tarif Pajak Efektif. *Prive: Jurnal Riset Akuntansi Dan Keuangan*, 4(September), 14–24.
- Fadli, I., Ratnawati, V., & Kurnia, P. (2016). Pengaruh likuiditas, leverage, komisaris independen, manajemen laba, dan kepemilikan institusional terhadap agresivitas pajak perusahaan (Studi pada perusahaan manufaktur yang terdaftar di Bursa Efek Indonesia periode 2011-2013). In *Jurnal Online Mahasiswa Fakultas Ekonomi Universitas Riau* (Vol. 3, Issue 1). Riau University.
- Firdayanti, N., & Kiswanto, K. (2020). Pengaruh Corporate Social Responsibility dan Leverage terhadap Agresivitas Pajak dengan Komisaris Independen dan Kepemilikan Institusional sebagai Variabel Moderating. *JAKA (Jurnal Akuntansi, Keuangan, Dan Auditing)*, 1(2), 42–52. <https://doi.org/10.56696/jaka.v1i2.4280>

- Firmansyah, A., Legowo, W. W., & Yuliana, S. F. (2021). Agresivitas Pajak Pada Perusahaan Perdagangan Di Indonesia: Profitabilitas, Capital Intensity, Leverage, Dan Ukuran Perusahaan. *Jurnal Bina Akuntansi*, 8(1), 84–108. <https://doi.org/10.52859/jba.v8i1.137>
- Gloria, & Apriwenni, P. (2020). Effective Tax Rate Dan Faktor -Faktor Yang Memengaruhi. *Jurnal Akuntansi*, 9(2), 17–31. <https://doi.org/10.46806/ja.v9i2.759>
- Guenther, D. A., Wilson, R. J., & Wu, K. (2019). Tax uncertainty and incremental tax avoidance. *The Accounting Review*, 94(2), 229–247.
- Gunawan, B., & Kris Resitarini, F. (2019). *The Influence of Corporate Governance Mechanisms, Profitability, Leverage, and Earnings Management on Tax Aggressiveness (An Empirical Study on Mining Sector Companies Listed on the Indonesia Stock Exchange in 2014-2017)*. 102(Icaf), 13–19. <https://doi.org/10.2991/icaf-19.2019.3>
- Handayani, R. (2019). Analysis of Corporate Social Responsibility and Good Corporate Governance to Tax Aggressiveness. *International Journal of Academic Research in Accounting, Finance and Management Sciences*, 9(3), 173–184. <https://doi.org/10.6007/ijarafms/v9-i3/6356>
- Hanna, H., & Haryanto, M. (2017). Agresivitas Pelaporan Keuangan, Agresivitas Pajak, Tata Kelola Perusahaan Dan Kepemilikan Keluarga. *Jurnal Akuntansi*, 20(3), 407–419. <https://doi.org/10.24912/ja.v20i3.6>
- Herlinda, A. R., & Rahmawati, M. I. (2021). Pengaruh Profitabilitas, Likuiditas, Leverage Dan Ukuran Perusahaan Terhadap Agresivitas Pajak. *Ilmu Dan Riset Akuntansi*, 10, 18.
- Hummel, K., Pfaff, D., & Bisig, B. (2019). Can the integration of a tax-compliant transfer pricing system into the management control system be successful?: Yes, it can! *Journal of Accounting and Organizational Change*, 15(2), 198–230. <https://doi.org/10.1108/JAOC-09-2017-0077>
- Indradi, D., & Setyahadi, M. M. (2019). Pengaruh Transaksi Hubungan Istimewa Terhadap Tarif Pajak Efektif Dengan Leverage Sebagai Variabel Moderating. *Jurnal Akuntansi*, 2(3), 375–392.
- Innocent, O. C., & Gloria, O. T. (2018). Effect of Corporate Governance Mechanisms on Tax Aggressiveness of Quoted Manufacturing Firms on the Nigerian Stock Exchange. *Asian Journal of Economics, Business and Accounting*, 8(1), 1–20. <https://doi.org/10.9734/ajeba/2018/38594>
- Kaca, D. M. (2020). Pengaruh leverage dan kepemilikan manajerial terhadap penghindaran pajak dengan transaksi hubungan istimewa sebagai variabel intervening (Studi Empiris Pada Perusahaan Pertambangan yang Terdaftar di Bursa Efek Indonesia Periode 2010-2016). *In Search--Informatic, Science, Entrepreneur, Applied Art, Research, Humanism*, 19(1), 110–125.
- Kariimah, M., & Septiowati, R. (2019). Pengaruh Pengungkapan Corporate Social Responsibility, Profitabilitas, Inventory Intensity, Capital Intensity Dan Leverage Pada Agresivitas Pajak. *Jurnal Akuntansi Berkelanjutan Indonesia*, 2(1), 017.
- Kramarova, K. (2021). Transfer Pricing and Controlled Transactions in Connection with Earnings Management and Tax Avoidance. *SHS Web of Conferences*, 92, 02031. <https://doi.org/10.1051/shsconf/20219202031>
- Kusuma, C. A., & Firmansyah, A. (2018). Manajemen Laba, Corporate Governance, Kualitas Auditor Eksternal Dan Agresivitas Pajak. *TEKUN: Jurnal Telaah Akuntansi Dan Bisnis*, 9(1), 108–123. <https://doi.org/10.22441/tekun.v8i1.2601>
- Mahrani, M., & Soewarno, N. (2018). The effect of good corporate governance mechanism and corporate social responsibility on financial performance with earnings management as mediating variable. *Asian Journal of Accounting Research*, 3(1), 41–60. <https://doi.org/10.1108/AJAR-06-2018-0008>

- Marundha, A., Fauzi, A., & Pramukty, R. (2020). Pengaruh Hubungan Istimewa Perusahaan Terhadap Penghindaran Pajak yang di Mediasi oleh Tax Heaven Country”(Studi Empiris Pada Perusahaan Manufaktur di *Ekonomi Manajemen Dan ...*, 1177, 4–15.
- Migang, S., & Rivia Dina, W. (2022). Pengaruh Corporate Governance Dan Pengungkapan Corporate Social Responsibility Terhadap Agresivitas Pajak. *Jurnal GeoEkonomi*, 13(1), 103–115. <https://doi.org/10.36277/geoekonomi.v13i1.196>
- Mustika, R., Ananto, R. P., & Handayani, D. (2018). Analisis Tarif Pajak Efektif di Indonesia. *Jurnal Akuntansi Keuangan Dan Bisnis*, 11(2), 1–8.
- Muti'ah et al. (2021). The influence of sales growth, debt equity ratio (der) and related party transaction to tax avoidance. *Ijmssr 2021*, 3(4), 237–244.
- Nilasari, A., & Setiawan, I. (2019). Pengaruh Good Corporate Governance Dan Transaksi Hubungan Istimewa Terhadap Effective Tax Rate (Studi Empiris Pada Perusahaan Manufaktur Yang Terdaftar Di Bursa Efek Indonesia Tahun 2013-2017). In *Jurnal Renaissance* (Vol. 4, Issue 02, p. 583). <https://doi.org/10.53878/jr.v4i02.104>
- Novitasari, S., Ratnawati, V., & Silfi, A. (2017). ... manajemen laba, corporate governance, dan intensitas modal terhadap agresivitas pajak perusahaan (Studi Empiris pada Perusahaan Property dan Real In *Jurnal Online Mahasiswa (JOM) Bidang Ilmu ...* Riau University.
- Nugroho, S. A., & Firmansyah, A. (2018). Pengaruh Financial Distress, Real Earnings Management Dan Corporate Governance Terhadap Tax Aggressiveness. *Journal of Applied Business Administration*, 1(2), 163–182. <https://doi.org/10.30871/jaba.v1i2.616>
- Nurhandono, F., & Firmansyah, A. (2017). Lindung Nilai , Financial Leverage ,. *Media Riset Akuntansi, Auditing, & Informasi*, 17(1), 31–52.
- Octaviani, R. R., & Sofie, S. (2019). Pengaruh Good Corporate Governance, Capital Intensity Ratio, Leverage, Dan Financial Distress Terhadap Agresivitas Pajak Pada Perusahaan Tambang Yang Terdaftar Di Bei Tahun 2013-2017. *Jurnal Akuntansi Trisakti*, 5(2), 253–268. <https://doi.org/10.25105/jat.v5i2.4848>
- Ogbeide, S. O. (2017). Firm Characteristics and Tax Aggressiveness of Listed Firms in Nigeria: Empirical Evidence. *International Journal of Academic Research in Public Policy and Governance*, 4(1), 556–569. <https://doi.org/10.46886/IJARPPG/v4>
- Prastiwi, D., & Walidah, A. N. (2020). Pengaruh agresivitas pajak terhadap nilai perusahaan: Efek moderasi transparansi dan kepemilikan institusional. *Jurnal Ekonomi Dan Bisnis*, 23(2), 203–224. <https://doi.org/10.24914/jeb.v23i2.2997>
- Putri, N., & Mulyani, S. D. (2020). Pengaruh Transfer Pricing Dan Kepemilikan Asing Terhadap Praktik Penghindaran Pajak (Tax Avoidance) Dengan Pengungkapan Corporate Social Responsibility (Csr) Sebagai Variabel Moderasi. *Prosiding Seminar Nasional Pakar, 2015*, 1–9. <https://doi.org/10.25105/pakar.v0i0.6826>
- Rahmayanti, S. K., Wibawaningsih, E. J., & Maulana, A. (2021). Pengaruh Kepemilikan Keluarga, Proporsi Komisaris Independen, Dan Komite Audit Terhadap Agresivitas Pajak. *Business Management, Economic, and Accounting National Seminar*, 2, 239–254.
- Ramadani, D. C., & Hartiyah, S. (2020). Pengaruh corporate social responsibility, leverage, likuiditas, ukuran perusahaan dan komisaris independen terhadap agresivitas pajak (Studi Empiris pada Perusahaan Pertambangan yang Terdaftar di Bursa Efek Indonesia Tahun 2014 sampai 2018). *Journal of Economic, Business and Engineering (JEBE)*, 1(2), 238–247. <https://doi.org/10.32500/jebe.v1i2.1219>
- Rambe, A. A., & Utami, W. (2021). Analysis of Factors Affecting Tax Aggressivity in Property and Real Estate Companies Listed in Indonesia Stock Exchange, 2017-2019. *International Journal of Business, Economics and Law*, Vol. 24, Issue 1 (April), 24(1), 1.
- Ramdhani, M. D., Zahra, Y., Fitriana, N., & Rachman, A. A. (2021). the Effect of Transfer Pricing on Tax Avoidance in Manufacturing Companies Listed on Lq 45 Indonesia Stock

- Exchange 2015-2019. *Turkish Journal of Physiotherapy and Rehabilitation*, 32(3), 9176–9194.
- Santini, A. L., & Indrayani, E. (2020). the Effect of Profitability, Liquidity, Leverage, Capital Intensity and Firm Size on Tax Aggressiveness With Market Performance As an Intervening Variable (Banking Companies Listed on Indonesia Stock Exchange in 2014 - 2018). *Jurnal Ilmiah Ekonomi Bisnis*, 25(3), 290–303. <https://doi.org/10.35760/eb.2020.v25i3.2853>
- Santoso, J. B., Sadeli, D., & Surtikanti, S. (2021). Pengaruh Pengecilan Modal, Transaksi Hubungan Istimewa, Dan Profitabilitas Terhadap Tax Avoidance. *Jurnal Pajak Dan Keuangan Negara (PKN)*, 3(1), 152–164. <https://doi.org/10.31092/jpkn.v3i1.1240>
- Sari, D. K., Utama, S., & Rossieta, H. (2017). Tax Avoidance, Related Party Transactions, Corporate Governance and the Corporate Cash Dividend Policy. In *Journal of Indonesian Economy and Business* (Vol. 32, Issue 3, p. 190). <https://doi.org/10.22146/jieb.28658>
- Sarpingah, S., & Purba, H. (2019). The Effect of Good Corporate Governance and Profit Management on Tax Aggressive (Empirical Study on Manufacturing Companies Listed on the IDX Periode 2014-2017). *International Journal of Accounting and Finance Studies*, 2(2), p95. <https://doi.org/10.22158/ijafs.v2n2p95>
- Subarnas, D., & Gunawan, Y. (2019a). Effect of Good Corporate Governance on Profitability. *Journal of Auditing, Finance, and Forensic Accounting*, 7(2), 90–96. <https://doi.org/10.21107/jaffa.v7i2.6721>
- Subarnas, D., & Gunawan, Y. (2019b). *Journal of Auditing, Finance, and Forensic Accounting (Jaffa) Effect of Good Corporate Governance on Profitability*. 7(2), 90–96.
- Tarmidi, D., Nila Sari, P., & Sormin, F. (2020). The Impact of External Control on Tax Avoidance. *South Asian Research Journal of Humanities and Social Sciences*, 2(4), 317–322. <https://doi.org/10.36346/sarjhss.2020.v02i04.015>
- Vanesali, L., & Kristanto, A. B. (2020). Corporate Governance and Leverage on Tax Aggressiveness: Empirical Study on Mining Companies in Indonesia. *International Journal of Social Science and Business*, 4(1), 81–89. <https://doi.org/10.23887/ijssb.v4i1.24193>
- Waluyo, W. (2019). the Effect of Good Corporate Governance on Tax Avoidance: Empirical Study of the Indonesian Banking Company. *The Accounting Journal of Binaniaga*, 2(02), 1–10. <https://doi.org/10.33062/ajb.v2i02.92>
- Wayan, P. (2022). Faktor-Faktor Yang Mempengaruhi Agresivitas Pajak. *Jurnal Pendidikan Indonesia*, 3(08), 719–739. <https://doi.org/10.36418/japendi.v3i08.1115>
- Widuri, R., Anugrah, Y., Yumico, Y., & Laurentia, C. (2019). The Effect of Family Ownership to Tax Aggressiveness with Good Corporate Governance and Transparency as Moderating Variable. *Journal of Economics and Business*, 2(1). <https://doi.org/10.31014/aior.1992.02.01.76>
- Yudawirawan, Moh. Y., Yanuar, Y., & Hamdy, S. (2021). Pengaruh Tata Kelola Perusahaan Dan Transfer Hubungan Istimewa Terhadap Tarif Pajak Efektif Perusahaan. *SCIENTIFIC JOURNAL OF REFLECTION: Economic, Accounting, Management and Business*, 4(1), 1–10. <https://doi.org/10.37481/sjr.v4i1.242>
- Yunistiyani, V., & Tahar, A. (2017). CORPORATE SOCIAL RESPONSIBILITY DAN AGRESIVITAS PELAPORAN KEUANGAN TERHADAP AGRESIVITAS PAJAK DENGAN GOOD CORPORATE GOVERNANCE SEBAGAI PEMODERASI (Studi pada Perusahaan Manufaktur di Bursa Efek Indonesia). *Jurnal Ilmiah Akuntansi*, 2(1), 1–31. <https://doi.org/10.23887/jia.v2i1.9610>
- Yusuf, M., & Khomsiyah. (2019). Effect of Board of Commissioners, Institutional Ownership and Capital Intensity Toward Tax Aggressiveness (Empirical Study of Manufacturing

Good Corporate Governance Effectiveness Mechanism, Special Relationship Transactions, and Leverage on Tax Aggressiveness

Companies Listed on IDX in 2011-2016. *South East Asia Journal of Contemporary Business, Economics and Law*, 19(5), 230–238.

Yusuf, M., Utami, W., & Mulyani, S. D. (2019). Effect of Good Corporate Governance on Tax Aggressiveness. *International Journal of Business, Economics and Law*, 20(5), 242–253.