The Effect of Tax and Leverage on Transfer Pricing Decisions with Institutional Ownership as Moderating

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The Effect of Tax and Leverage on Transfer Pricing Decisions with Institutional Ownership as Moderating

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Abstract

This study aims to determine the effect of tax and leverage on transfer prid 113 decisions with institutional ownership as moderating. The population in this study are manufacturing companies listed on the Indonesia Stock Exchange in 2285-2019. The sampling technique used is purposive sampling. The number of samples in this study amounted to 110 observations. This research is classified as quantitative research which is tested using the 2 oderating Regression Analysis (MRA) analysis technique. The results of this study indicate that taxes have a significant effect on transfer pricing decisions. Leverage has no significant effect on transfer pricing decisions. While the variable of institutional ownership as a moderating factor is not able to moderate the relationship of tax effect on transfer pricing decisions, but institutional of ership is able to moderate the relationship of leverage to transfer pricing decisions. The coefficient of determination is 0.138, which means that 13.8% of the indications That the company is doing transfer pricing is influenced by this variable, while the rest is explained by other variables. This shows that there are still many variables outside the study that can explain transfer pricing.

Keywords

Tax; leverage; institutional ownership; transfer pricing



I. Introduction

Many national companies have now shifted into multinational companies whose business activities are not only centered in one country, but in several countries (Hartati et al, 2014). Multinational companies are companies that have a parent entity or branch in more than one country. Furthermore, as a profit-oriented company, of course the company will try to get maximum profit through various ways, including through cost efficiency. This condition has a tendency to occur in manufacturing companies whose production processes are carried out in production departments. The development of the company's strategy leads to one main goal, namely to maximize profits and minimize costs and expenses (Hasna and Mulyani, 2020). This may not be a problem if it only occurs in a company in one country because the expenses and costs incurred will be more easily measured. However, this is different for multinational companies because it will be difficult to determine the selling price and costs incurred in the context of monitoring and measuring company performance (Refgia, 2017). In addition, the existence of transactions of goods and services that occur in multinational companies that have a special relationship is the main reason why an activity called transfer pricing is carried out in order to determine the price.

The economic condition of the population is a condition that describes human life that has economic score (Shah et al, 2020). Economic growth is still an important goal in a country's economy, especially for developing countries like Indonesia (Magdalena and Suhatman, 2020).

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Transfer pricing is a technique for optimal allocation of costs and revenues among divisions, subsidiaries and joint ventures within a group of related entigon. Transfer pricing practices are simultaneously involved in wealth retention processes that enable firms to avoid taxes and facilitate capital flight (Kaur, 2013). The transfer pricing policy raises several problems regarding customs, taxes, anti-dumping provisions, unfair business competition, and also includes internal company management problems (Klassen et al., 2013). The use of transfer pricing policies is currently being transformed as an international tax issue where transfer pricing policies are used as a tool to reduce the overall tax burden for multinational companies or companies on a global scale. Experts also argue that transfer pricing is not only a problem for companies, but it can also be an opportunity for companies to abuse taxes to pursue high profits. For multinational companies that have subsidiaries in countries with high tax rates, this will be a problem because they will pay more taxes, so the net profit will be less (Sarifah et al, 2019) According to Mispiyanti (2015), the increasing tax burden has trigg 32d companies to make transfer pricing decisions in the hope of reducing the tax burden. Transfer pricing in the sale of goods or services is carried out by reducing the selling price between companies that have a special relationship and transferring the profits earned to companies domiciled in countries that apply low tax rates (Putri and Mulyani, 2020). However, the transaction has problems because of the unavailability of tools, experts, and standard or fixed regulations, so the transfer pricing examination is often won by the taxpayer in the tax court so that multinational companies are increasingly motivated to carry out transfer pricing (Julaikah and Nurul, 2014).

Based on the above review, this research is important to do because of the novelty in this study, namely using institutional ownership as a variable that moderates tax planning and leverage on transfer pricing decisions, the thing that motivates the author to choose this title is because of the research gap from one study to another, so it has not shown consistent results. This research was conducted to examine the "Effect of Taxes and Leverge on Transfer Pricing Decisions with Institutional Ownership as Moderating".

This study uses a sample of manufacturing companies listed on the Indonesia Stock Exchange in 2015-2019. This is because transfer pricing practices occur in multinational manufacturing companies that have overseas subsidiaries. Manufacturing companies have a high probability of conducing transactions between parties that have a special relationship, such as the sale of goods or services between the parent company and subsidiary companies, so in these transactions there is a possibility for transfer pricing practices to occur.

II. Research Method

This research includes quantitative research. Quantitative research is research that analyzes numerical data that is processed by statistical methods whose results will be interpreted to obtain a conclusion. Based on the method, this research is included in historical research, namely research related to past events in the form of a systematic and objective company's past financial statements. Based on the data source, this research is research that uses secondary data sources, namely data obtained from various existing sources such as financial reports, journals, books, and others. Meanwhile, according to the research objective, this research is a descriptive study because it describes how taxes and leverage influence transfer pricing decisions with institutional ownership as a moderating variable.

The purpose of this research is to limit the scope of the research so that the discussion of this registrich is clear, does not expand and leads to the problems being studied. Limitations in this study are manufacturing companies listed on the Indonesia Stock Exchange in the 2015-2019 period.

The variables used in the research to be conducted are as follows:

- 1. The dependent variable (TP) is the transfer pricing decision
- 2. Independent variables, namely:
 - a. Tax (PJK)
 - b. Leverage (LEV)
 - c. Institutional ownership (KI)
- 3. Moderating Variable, namely Institutional Ownership (KI)

III. Result and Discussion

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3.1 The Effect of Taxes on Transfer Pricing Decisions

The results of the study indicate that taxes have a negative effect on transfer pricing. This means that as the tax-imposed arcreases, the company's transfer pricing with related parties will decrease or vice versa. The results of this study are consistent with research conducted by Marfuah and Azizah (2013) which shows that taxes have a significant negative effect on transfer pricing. These results are also in line with asearch conducted by (Hartati, Desmiyawati, & Azlina, 2014) which states that taxes have a significant influence on the company's decision to transfer pricing where the size of the company's decision to transfer pricing where the size of the company's supported by research (Refgia, 2017) which states that the lower the value of the company's effective tax rate is. A good score here indicates that the company has successfully carried out tax planning. One way to do the tax planning is by transfer pricing.

Agency theory explains that the information gap between shareholders and management is the beginning of the emergence of agency conflicts. The management tries to hide any information that can harm the interests of shareholders. This condition has the effect of reducing the expectations of shareholders to benefit from the company's operations due to this opportunistic behavior. Therefore, to provide welfare to shareholders, managers will carry out a plan to provide prosperity. In this case, management takes advantage of gaps in tax regulations between different countries to carry out transfer pricing. Multinational companies as a form of company with a large foreign ownership structure attempt to conduct transactions with the parent or branch that is still in the same group of companies by practicing transfer pricing. This is based on the fact that tax is a burden that does not provide direct benefits to the company.

3.2 Effect of Leverage on Transfer Pricing Decisions

Based on the results of testing the second hypothesis, it can be seen that the leverage variable proxied by the Debt-to-Equity Ratio (DER) has no significant effect on transfer pricing decisions in manufacturing companies listed on the Indonesia Stock Exchange in 2015-2019. The hypothesis indicates that the test results are not in accordance with the hypothesis or the hypothesis is rejected. This means that leverage has no effect on indications for transfer pricing.

Debt Convenat Hypothesis, in this case managers of companies that have a large leverage ratio (debt/equity) will prefer to choose accounting procedures that can replace earnings reports for the future period to the current period. By choosing an accounting

method that can transfer profit recognition for the future period to the current period, the company will have a small leverage ratio, thereby reducing the possibility of technical default. Although the amount of profit can reduce the penalty for debt agreements, it does not mean that the directors will justify any means by committing fraud such as manipulating financial statements by utilizing transfer pricing tansactions between related parties to increase sales where the sale can indirectly increase the company's profit in the specified year. The company allows using the debt obtained for investment purposes, so as to ger the income outside the company's business and can increase company profits.

The results of this study are negative line with research conducted by (Richardson, Taylor, & Lanis, 2013) which states that the leverage variable has a significant effect on transfer pricing decisions. However, it is supported by research from (Swingly & Sukartha, 2015) which states that the leverage variable has no significant effect on transfer pricing decisions where the higher the leverage ratio value, the higher the third paradebt funding used by the company, this causes higher interest costs. High interest costs affect the value of the company's debt so that transfer pricing will be more difficult to do. The greater the leverage value means the greater the costs borne by the company in fulfilling its obligations, this can result in the company's profit decreasing. The decline in the paradebt and can indirectly minimize the tax burden so that transfer pricing is less likely, therefore in order to gain the trust of creditors, the company is more focused on maximizing its performance by being more careful and transparent in reporting any financial conditions that arise owned by the company.

IV. Conclusion

This study aims to determine the effect of tax and leverage of ansfer pricing as well as the ability of institutional ownership to weaken or strengthers he effect of taxes, and leverage on transfer pricing. This research is quantitative and the data used in this studience sourced from IDX (Indonesia Stock Exchange) and the company's official website. This study uses a population of companies sted on the IDX with a five-year observation period, namely 2015-2019. The sample of this research is a manufacturing company. The total sample is 110 samples.

Testing the hypothesis in this study using multiple linear regression analysis test. Based on the 29st results, the conclusions that can be obtained are as follows:

Taxes have a significant negative effect on the company's transfer pricing decisions. These results indicate that the higher the tax rate imposed, the lower the company's transfer pricing decision or vice versa. In this study, the possibility of companies reducing the high corporate that burden by implementing tax management, not through transfer pricing. Leverage does not significantly affect the company's decision to practice transfer pricing. The greater the leverage value means the greater the costs borne by the company in fulfilling its obligations, this can result in the company's profit decreasing. The decline in the company's profit was due to the large interest costs incurred on loans. High interest costs affect the value of the company's debt and can indirectly minimize the tax burden so that transfer pricing is less likely, therefore in order to gain the trust of creditors the company is more focused on maximizing its performance by being more careful and transpard in reporting its financial condition. Institutional ownership has a significant positive effect on the company's transfer pricing decisions. The existence of institutional investors is considered capable of being a monitoring and disciplining mechanism as well as influencing every decision taken by managers effectively. This is because institutional

investors are involved in strategic decisions so they do not easily believe in earnings manipulation. Institutional ownership is not able to moderate the relationship between taxes and transfer pricing. It can happen that the high or low institutional shares invested in a company are not able to moderate the relationship between taxes and transfer pricing. Institutional ownership is known to be able to monitor company management. In this study, the role of institutional ownership is known to be able to be monitoring management or a form of control over the management Institutional ownership is able to moderate the relationship between debt covenants and transfer pricing. This means that the size of the shares invested by institutional parties can affect the relationship between debt covenants and transfer pricing.

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