THE INFLUENCE OF FOREIGN OWNERSHIP, BONUS MECHANISM AND TAX BURDEN ON TRANSFER PRICING
(Empirical study of non-cyclical consumer sector companies listed on the Indonesia Stock Exchange for the period 2019-2023)

Veronica Sella Saputra[1,] Dinar Ambarita[2]
Faculty of Economic and Business, Pamulang University
Email : sveronicasella@gmail.com, dosen02308@unpam.ac.id

ABSTRACT

The study explores the influence of Foreign Ownership, Bonus Mechanisms and Tax Burden on Transfer Pricing in the context of multinational corporations. Transfer Pricing, as one of the company's tax management strategies. This study aims to provide empirical evidence of the influence of Foreign Ownership, Bonus Mechanism and Tax Charges on Transfer Pricing on Consumer Non-Cyclicals companies during 2019-2023 period. The type of research used is quantitative, using secondary data taken from financial statements of companies listed on the IDX or Indonesia Stock Exchange and the method used is purposive sampling. The total number of research samples was 8 companies. The methods used are double linear regression descriptive statistical tests, analysis of panel data regression models, selection tests of selected models Random Effect Model, classical assumption tests, and hypothesis tests with the help of E-views version 12. The results of this study show on test f that Foreign Ownership, Bonus Mechanism and Tax Charge simultaneously have a significant effect on Transfer Pricing and on test t states partially that Foreign Ownership has an effect on the transfer of pricing. significant to Transfer Pricing, and on the variable Bonus Mechanism and Tax Burden does not significantly affect Transfer Pricing. The study aims to analyze the interactions between Foreign Ownership, Bonus Mechanism, Tax Burden on Transfer Pricing, as well as provide important implications in preventing tax avoidance, tax compliance and corporate efficiency. The study results are expected to provide insight for regulation and practitioners in formulating more effective policies to address the challenges of Transfer Pricing in a global context.

Keywords: Foreign Ownership, Bonus Mechanism, Tax Burden, Transfer Pricing

ABSTRAK

Penelitian ini membahas tentang pengaruh Kepemilikan Asing, Mekanisme Bonus dan Beban Pajak terhadap Penetapan Harga Transfer dalam konteks perusahaan multinasional. Penetapan Harga Transfer, sebagai salah satu strategi pengelolaan pajak perusahaan. Penelitian ini bertujuan untuk memberikan bukti empiris tentang pengaruh Kepemilikan Asing, Mekanisme Bonus dan Beban Pajak terhadap Penetapan Harga Transfer pada perusahaan Consumer Non-Cyclicals selama periode 2019-2023. Jenis penelitian yang digunakan adalah kuantitatif, dengan menggunakan data sekunder yang diambil dari laporan keuangan perusahaan yang terdaftar di BEI atau Bursa Efek Indonesia dan metode

yang digunakan adalah purposive sampling. Jumlah sampel penelitian sebanyak 8 perusahaan. Metode yang digunakan adalah uji statistik deskriptif regresi linier berganda, analisis model regresi data panel, uji pemilihan model terpilih Random Effect Model, uji asumsi klasik, dan uji hipotesis dengan bantuan E-views versi 12. Hasil penelitian ini menunjukkan pada uji f bahwa Kepemilikan Asing, Mekanisme Bonus dan Beban Pajak secara simultan berpengaruh signifikan terhadap Penetapan Harga Transfer dan pada uji t menyatakan secara parsial bahwa Kepemilikan Asing berpengaruh terhadap penetapan harga transfer. signifikan terhadap Transfer Pricing, dan pada variabel Mekanisme Bonus dan Beban Pajak tidak berpengaruh signifikan terhadap Transfer Pricing. Penelitian ini bertujuan untuk menganalisis interaksi antara Kepemilikan Asing, Mekanisme Bonus, Beban Pajak terhadap Transfer Pricing, serta memberikan implikasi penting dalam mencegah penghindaran pajak, kepatuhan pajak, dan efisiensi perusahaan. Hasil penelitian ini diharapkan dapat memberikan wawasan bagi regulasi dan praktisi dalam merumuskan kebijakan yang lebih efektif untuk mengatasi tantangan Transfer Pricing dalam konteks global.

Kata Kunci: Kepemilikan Asing, Mekanisme Bonus, Beban Pajak, Penetapan Harga Transfer

1.   INTRODUCTION

Nowadays, many companies expand their business to other countries through subsidiaries or branches, or can be called multinational corporations. In developing its business, the company will always strive to improve the efficiency and effectiveness of the company in achieving its goals, one of which is to increase profits. In multinational companies, transactions often occur between divisions and even between related companies or those with special relationships, one of which is the sale of goods or services. The price factor is a tool for various implementations in tax saving efforts carried out by business organizations, both on a national and international scale. This allows multinational companies to shift their profits to countries with low tax rates, thus minimizing the tax burden in an effort to maximize profits.

Countries with high tax rates tend to experience a decrease in government revenues because transfer pricing actors often shift profits to countries with lower tax rates. This practice clearly has a negative impact on government revenues. However, governments often lose appeals in tax courts (Amidu et al., 2019). This is due to a lack of human resource knowledge on transfer pricing, and a lack of understanding of transfer pricing indications by tax auditors within the Directorate General of Taxes. As a result, the audit of MNEs suspected of transfer pricing is very limited, allowing these companies to take advantage of the existing loopholes.

In Indonesia, there is a company that is suspected of transfer pricing, namely Unilever. Unilever is one of the companies involved in the daily consumer goods industry, such as personal care products, food, and household hygiene products. Unilever is one of the largest consumer goods companies in the world, operating in more than 190 countries. Due to the global nature of its operations, the company often moves goods or services between its subsidiaries located in countries with different tax rules. This creates the potential for transfer pricing. Unilever has subsidiaries in countries with low production costs, such as Indonesia and India. These subsidiaries sell finished products, such as soaps

or detergents, to distribution companies located in higher tax countries, namely the UK and Germany.

Unilever is not the only case of transfer pricing, there is also the case of Procter & Gamble (P&G), Procter & Gamble (P&G) allegedly sold its products from Brazil to other foreign subsidiaries at below-market prices or purchased raw materials from affiliates at above-market prices. This is known as a transfer pricing strategy, the purpose of which is to reduce taxable profits in Brazil.

Foreign ownership is also one of the reasons why companies engage in transfer pricing. Foreign shareholders with large holdings may have more control over the company. They may decide to engage in transfer pricing to benefit themselves, which may harm non-controlling shareholders. Poor transfer pricing practices can damage the company's reputation, especially if it engages in tax avoidance. Based on the results of previous research conducted by (Rahadian, 2015) and (Refgia, 2017), it shows that foreign ownership has a significant effect on Transfer Pricing practices, and according to (Juarsa Badri, Nidia Anggreni Das and Yosep Eka Putra, 2021) states that foreign ownership has no effect on Transfer Pricing.

Another factor influencing the company's decision to engage in transfer pricing is the bonus mechanism. The bonus mechanism is often designed based on earnings performance, which means that managers have the initiative to manipulate the company's financial statements to achieve higher profits. Based on the results of the research conducted by (Saraswati & Sujana, 2017) stated that the bonus mechanism has no effect on transfer pricing, but the results of this study contradict the results of (Melmusi, 2016) who concluded that the bonus mechanism has a significant effect on transfer pricing.

Tax burden is the total amount of tax liability that an individual or firm must pay to the government based on specific taxable income, profits, or activities. The tax burden can vary depending on the type of tax imposed, the applicable tax rate, and the tax rules in a particular country. The tax burden affects the Company's cash flow, net income and business strategy, as well as individual income. Based on the results of research conducted by (Heru Ravensky and Taufiq Akbar, 2021) tax burden has no effect on transfer pricing, but the results of this study are not in line with previous researchers, namely Dwikora Harjo (2020), who states that tax burden has a significant effect on transfer pricing.

2. THEORETICAL FRAMEWORK AND HYPOTHESIS

Compliance Theory (Grand Theory)

This theory explains a state in which a person obeys a given order or rule. There are two perspectives on compliance in sociology, namely instrumental and normative. The instrumental perspective assumes that individuals are thoroughly reinforced by self-interest and perceptions of change associated with behavior. The normative perspective is related to the notion that people are moral and opposed to self-interest. An individual who complies with the law is considered appropriate and consistent with the norms that have been applied.

The relationship of compliance theory to foreign ownership, the bonus mechanism, and the tax burden on transfer pricing can be explained by considering the costs and benefits of tax compliance. These three factors may influence a firm's decision to engage in transfer pricing. If foreign ownership and tax burden tend to increase high incentives to engage in transfer pricing, then this will have an impact on corporate tax compliance. Bonus mechanism can also affect management behavior in managing transfer pricing, so this will also have an impact on corporate tax compliance.

Agency Theory (Middle Theory)

According to Jensen and Meckling (1976), agency theory is a framework that explains the relationship between principals and agents, which may involve individuals, groups, or organizations. On the other hand, according to Scott (2015), this theory focuses on the conflicts of interest that may arise between principals and agents. For example, in the hospitality industry, the chief executive officer acts as a principal, while the manager acts as an agent. Scott also explains that principals and agents have different goals, namely, principals want to maximize the value or profit of the firm, and agents may have personal interests, such as maximizing compensation or other interests.

This research is in line with agency theory, which explains that agency problems arise due to different interests within a firm. But these three factors, foreign ownership, bonus mechanism, tax burden on transfer pricing, can also play a role in strengthening or reducing agency conflicts within the company, depending on how they are managed, and transparent taxes are the key to minimizing agency conflicts.

Transfer Pricing

Transfer pricing is the practice of determining prices in transactions between related entities, such as between subsidiaries and parent companies, or between companies in the same group. In the context of international business, transfer pricing becomes an important issue because multinational companies can take advantage of differences in tax rules between countries to minimize their tax burden.

$$\textit{Transfer Pricing} = \frac{\text{Piutang Kepada Pihak Berelasi}}{\text{Total Piutang}} \times 100\%$$

Foreign Ownership

Article 1 paragraph 8 of Law No. 25 Year 2007 states that foreign capital is capital originating from foreign countries, foreign individuals and Indonesian legal entities whose capital is partly or wholly owned by foreign parties. Based on this article, it can be concluded that foreign ownership is defined as the portion of a company's ordinary shares owned by individuals, legal entities or governments with foreign status.

$$\text{Kepemilikan Asing} = \frac{\text{Jumlah Kepemilikan Saham Asing}}{\text{Total Saham Beredar}} \times 100\%$$

Bonus Mechanism

A bonus mechanism is the provision of additional compensation or rewards to company employees for good performance and achievement of company goals. One of the most common methods used by companies to provide compensation is through profit-based bonuses.

$$\text{ITRENDLB} = \frac{\text{Laba Bersih Tahun t}}{\text{Laba Bersih Tahun-t}} \times 100\%$$

Tax Burden

According to PSAK No. 46, tax expense is the combined total of current tax and deferred tax calculated and recognized as expense or income in the income statement for the current period.

ETR	=	$\dfrac{\text{Beban Pajak Penghasilan}}{\text{Laba Bersih Sebelum Pajak}}$ x 100%

3. RESEARCH METHOD

Population and Sample

The population studied in this study were companies in the Consumer Non-Cyclicals sector listed on the Indonesia Stock Exchange (IDX) during the period 2019 to 2023. The population in this study included 8 companies. In this study, the sample was selected using the purposive sampling method, which is a sampling technique based on certain considerations. The criteria used to select the sample in this study include the following : (1) Companies that are not listed on the IDX in consecutive years from 2019 to 2023, (2) Companies that do not report financial statements for the period from 2019 to 2023, (3) Companies that do not use the Rupiah currency, (4) Companies that do not make profits in consecutive years from 2019 to 2023, (5) Companies that have incomplete variables during the period 2019 to 2023.

Operational Variable

This research involves dependent variables and independent variables. The dependent variable is the variable that is affected by the independent variable. In this study, the dependent variable is transfer pricing, while the independent variables are foreign ownership, bonus mechanism, and tax burden.

Analysis Technique

The data analysis technique in this study uses quantitative methods with statistical computing techniques. Data analysis includes descriptive statistics, model testing, multiple linear regression analysis, and hypothesis testing. In addition, a classical assumption test is performed, which consists of normality, heteroscedasticity, autocorrelation, and multicollinearity tests to ensure that the model used is accurate, unbiased, and efficient.

4. DATA ANALYSIS AND DISCUSSION

Based on the data that has been processed using e-views version 12, the following results are obtained :

Descriptive Statistics

Table 1 : Descriptive Analysis Result

Sample: 2019 2023				
	Y	X1	X2	X3
Mean	0.134400	0.543700	1.385900	-0.232300
Median	0.030000	0.501000	1.099000	-0.234000
Maximum	0.795000	1.110000	5.658000	0.051000
Minimum	0.000000	0.165000	0.005000	-0.815000
Std. Dev.	0.201435	0.296520	1.164385	0.121903

| Observations | 40 | 40 | 40 | 40 |

Source : E-Views 12 Output Result

Transfer Pricing has an average (mean) value of 0.134400, a maximum (maximum) value of 0.795000, a minimum (minimum) value of 0.000000 and a standard deviation of 0.201435. Foreign Ownership has a mean (average) value of 0.543700, a maximum of 1.110000, a minimum of 0.165000 and a standard deviation of 0.296520. The bonus mechanism has a mean value of 1.385900, a maximum value of 5.658000, a minimum value of 0.005000 and a standard deviation of 1.164385. Tax Expense has a mean value of -0.232300, a maximum value of 0.0510000, a minimum value of -0.8150000 and a standard deviation of 0.121903.

Data Regression Model Analysis Panel

To describe the relationship between transfer pricing variables with foreign ownership, bonus mechanism and tax burden, several panel data analysis techniques are used, such as common effect model, fixed effect model and random effect model.

Table 2 : Common Effect Model

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	0.015148	0.098577	0.153664	0.8787
X1	0.216666	0.107491	2.015667	0.0513
X2	-0.003165	0.027616	-0.114615	0.9094
X3	-0.025129	0.264002	-0.095185	0.9247

Source : E-Views 12 Output Result

Table 3 : Fixed Effect Model

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	-0.201469	0.239768	-0.840265	0.4076
X1	0.471332	0.422837	1.114690	0.2741
X2	0.025861	0.024793	1.043074	0.3055
X3	-0.188398	0.221381	-0.851014	0.4017

Source : E-Views 12 Output Result

Table 4 : Random Effect Model

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	0.397326	0.077815	5.106047	0.0000
X1	0.597570	0.131487	4.544717	0.0001
X2	-0.010285	0.022253	-0.462167	0.6468
X3	-0.230489	0.191712	-1.202265	0.2373

Source : E-Views 12 Output Result

Equation Model Selection Test
Chow Test
        The results of Chow Test can be seen in table 5 as follows:

Table 5 : Chow Test

Effects Test	Statistic	d.f.	Prob.
Cross-section F	4.902873	(7,29)	0.0010
Cross-section Chi-square	31.236285	7	0 .0001

Source : E-Views 12 Output Result

        Based on Table 5 of the Chow test results above, it can be seen that the cross section F probability value is $0.0001 < 0.05$. Therefore, the model selected with these results is the fixed effect model.

Hausman Test
        The results of Hausman Test can be seen in table 4.6 as follows:

Table 6 : Hausman Test

Test Summary	Chi-Sq. Statistic	Chi-Sq. d.f.	Prob.
Cross-section random	1.167671	3	0.7608

Source : E-Views 12 Output Result

        Based on Table 4.6 of the Hausman test results above, it can be seen that the cross section F probability value is $0.7608 > $ of 0.05. Thus, the model selected with these results is the random effect model.

Lagrange Multiplier Test
        The results of Lagrange Multiplier Test can be seen in table 4.7 as follows:

Table 7 : Lagrange Multiplier Test

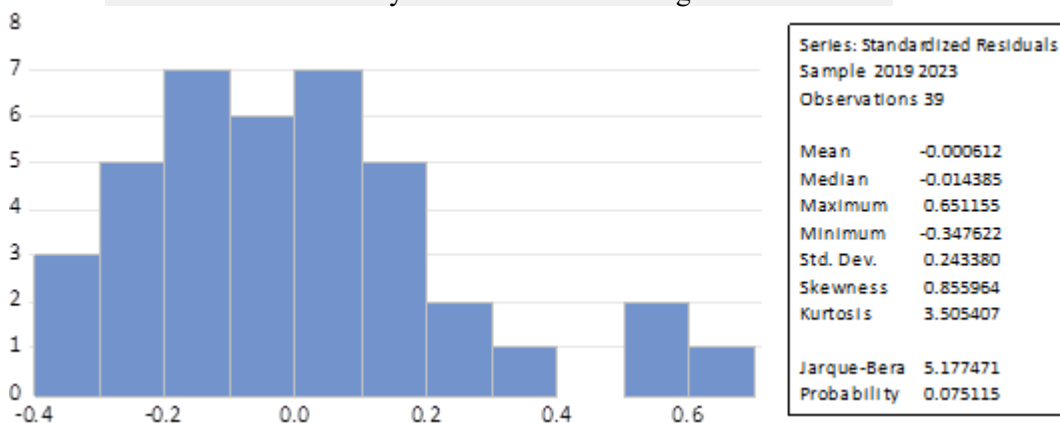| Lagrange Multiplier Tests for Random Effects			
	Cross-section	Test Hypothesis Time	Both
Breusch-Pagan	12.23431 (0.0005)	2.749144 (0.0973)	14.98345 (0.0001)
Honda	3.497757 (0.0002)	-1.658054 (0.9513)	1.300866 (0.0967)
King-Wu	3.497757 (0.0002)	-1.658054 (0.9513)	0.786557 (0.2158)
Standardized Honda	4.419056 (0.0000)	-1.491815 (0.9321)	- 1.069974 (0.8577)

Standardized King-Wu	4.419056 (0.0000)	-1.491815 (0.9321)	-1.619303 (0.9473)
Gourieroux, et al.	--	--	12.23431 (0.0008)

Source : E-Views 12 Output Result

Based on Table 7 of the Langrange Multiplier Test results above, it can be seen that the Breusch-Pagan value is 0.0005 > of 0.05. So the model selected with these results is the random effect model.

Normality Test

The results of Normality Test can be seen in Figure 1 as follows:

Series: Standardized Residuals	
Sample 2019 2023	
Observations	39
Mean	-0.000612
Median	-0.014385
Maximum	0.651155
Minimum	-0.347622
Std. Dev.	0.243380
Skewness	0.855964
Kurtosis	3.505407
Jarque-Bera	5.177471
Probability	0.075115

Source : E-Views 12 Output Result
Figure 1 : Histogram Normality Test

Based on the results of the normality test in Figure 4.1 above, we can see that the probability value of 0.075115 is greater than the significance value of 0.05, which means that the data is normally distributed.

Multicolinearity Test

The results of Multicolinerity Test can be seen in table 4.8 as follows:

Table 8 : Multicolinearity Test

	X1	X2	X3
X1	1.000000	0.031887	-0.051766
X2	0.031887	1.000000	0.141894
X3	-0.051766	0.141894	1.000000

Source : E-Views 12 Output Result

The results of the Multicolonierity Test (Correlation) in Table 4.8 above are obtained from the correlation value between independent variables. The correlation coefficient of X1 and X2 is 0.031887 < 0.8, X1 and X3 are -0.051766 < 0.8, and X2 and X3 are 0.141894 < 0.8. Therefore, it can be concluded that these data are free from the

Multicolonierity Test.

Heteroskedasticity Test

The heteroscedasticity test aims to detect the presence or absence of heteroscedasticity. The heteroscedasticity test in this study uses the Glejser test.

Table 9 : Heteroskedasticity Test

Heteroskedasticity Test: Glejser			
Null hypothesis: Homoskedasticity			
F-statistic	2.072799	Prob. F(3,35)	0.1216
Obs*R-squared	5.883720	Prob. Chi-Square(3)	0.1174
Scaled explained SS	3.796655	Prob. Chi-Square(3)	0.2843

Source : E-Views 12 Output Result

Based on Table 4.9 above, it is determined that the probability value of Chi-Square or Obs * R-Square = $0.1174 > 0.05$, which means that these data are free from problems of heteroscedasticity test.

Autocorrelation Test

This study uses the Durbin-Watson (DW) test to determine whether or not there is an autocorrelation problem.

Table 10 : Autocorrelation Test

Durbin-Watson stat	2.839282

Source : E-Views 12 Output Result

The DW value obtained is 2.839282, which means that this value is between DU and 4-DU, so DU < DW < 4-DU or $1.6589 < 2.839282 < 2.3411$, so it can be concluded that there is no autocorrelation and this model is suitable for further analysis.

Panel Data Regression Analysis

In Panel Data Regression, it was decided to use Random Effects Model, so this Random Effects Model Panel Data Regression Analysis:

Table 11 : Panel Data Regression Analysis

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	0.397326	0.077815	5.106047	0.0000
X1	0.597570	0.131487	4.544717	0.0001
X2	-0.010285	0.022253	-0.462167	0.6468
X3	-0.230489	0.191712	-1.202265	0.2373

Source : E-Views 12 Output Result

Y = 0.397326 + 0.597570*X1 – 0.010285*X2 - 0.230489*X3 + ε

Here are the explanations :
1. The constant value is 0.397326, indicating that in the absence of the foreign ownership

variable (X1), bonus mechanism (X2), and tax burden (X3), the transfer pricing variable (Y) will increase by 39%.

2. The coefficient of foreign ownership variable (X1) is 0.597570, which means that if other variables remain constant and the foreign ownership variable (X1) increases by 1%, the transfer pricing variable (Y) will increase by 59%.

3. The coefficient of the bonus mechanism variable (X2) is -0.010285, which means that if the value of other variables is constant and the bonus mechanism variable (X2) increases by 1%, the transfer pricing variable (Y) will increase by 1%.

4. The coefficient of the tax burden variable (X3) is -0.230489, which means that if the value of the other variables is constant and the tax burden variable (X3) increases by 1%, the transfer pricing variable (Y) will decrease by 23%.

Cofficient of Determinasi (R^2)

The results of Cofficient of Determinasi (R^2) can be seen in table 4.12 as follows:

Table 12 : Cofficient of Determinasi (R^2)

R-squared	0.310128	Mean dependent var	0.262408
Adjusted R-squared	0.250996	S.D. dependent var	0.186572
S.E. of regression	0.161898	Sum squared resid	0.917386
F-statistic	5.244683	Durbin-Watson stat	1.095099
Prob(F-statistic)	0.004280		

Source : E-Views 12 Output Result

The result of the coefficient of determination test (R2) shows that the adjusted R-squared value is 0.250996, which means that the independent variables, namely foreign ownership, bonus mechanism and tax burden, are able to explain 25% of the transfer pricing variable, while the remaining 75% is explained by other variables not examined in this study.

Hypothesis Testing

The results of hypothesis testing in this study are as follows:

Simultaneous Hypothesis Testing (F Test)

The results of Simultaneous Hypothesis Testing (F Test) in this study are as follows:

Table 13 : F Test

R-squared	0.310128	Mean dependent var	0.262408
Adjusted R-squared	0.250996	S.D. dependent var	0.186572
S.E. of regression	0.161898	Sum squared resid	0.917386
F-statistic	5.244683	Durbin-Watson stat	1.095099
Prob(F-statistic)	0.004280		

Source : E-Views 12 Output Result

Based on Table 4.13 of the simultaneous test results above that the F-count value is 5.244683 with a significance of 0.004280, while to find the F-table with the number (n) = 40, the number of variables (k) = 4, the significance level a = 0.05, then df1 = k-1 (df1 =

4 - 1 = 3) and df2 = n - k (df2 = 40 - 4 = 36) obtained an F-table value of 2.87. So that F-count 5.244683 > F-table 2.87 and systematically obtained a significance value of 0.004280 < 0.05 significance level, so it is concluded that H0 is rejected H1 is accepted, which explains that foreign ownership (X1), bonus mechanism (X2), tax burden (X3), simultaneously have a significant effect on transfer pricing (Y).

Partial Hypothesis Testing (t Test)

The results of Partial Hypothesis Testing (t Test) in this study are as follows:

Table 14 : t Test

Variable	Coefficient	Std. Error	t-Statistic	Prob.
C	0.397326	0.077815	5.106047	0.0000
X1	0.597570	0.131487	4.544717	0.0001
X2	-0.010285	0.022253	-0.462167	0.6468
X3	-0.230489	0.191712	-1.202265	0.2373

Source : E-Views 12 Output Result

Looking for the level of significance using $\alpha = 5\% = 0.05$ because it uses pages, $\alpha/2 = 0.025$ with degrees of freedom Df = n-k where n is the amount of data used and k is the number of independent variables. Then 40-3 = 37, so the t-table value is 2.02619, which is then compared with the t-count of each independent variable used to determine whether the hypothesis can be accepted. Based on Table 4.16 of the partial t-test results above, it can be explained that:

1. The t-test results on the KA variable (X1) obtained a t-value of 4.544717> t-table, namely 2.02619 and a sig value. 0.001 <0.05, then the hypothesis result (H1) is accepted, which means that the foreign ownership variable affects transfer pricing (Y).

2. The t-test results on the variable ITRENDLB (X2) obtained a t-value of 0.462167 < t-table, namely 2.02619 and a sig value. 0.6468 > 0.05, then the hypothesis result (H2) is rejected, which means that variable X2 has no effect on transfer pricing (Y).

3. The t-test results on the variable ETR (X3) obtained a t-value of 1.202265 < t-table 2.02619 and a sig-value. 0.2373 > 0.05, then the hypothesis result (H3) is rejected, which means that variable X3 has no effect on transfer pricing (Y).

5. CONCLUSION & SUGGESTION

This study aims to analyze the effect of Foreign Ownership, Bonus Mechanism, Tax Burden on Transfer Pricing, both simultaneously and partially in Consumer Non-Cyclicals sector companies listed on the Indonesia Stock Exchange (IDX) for the 2019-2023 period. The first hypothesis shows that Foreign Ownership, Bonus Mechanism, and Tax Burden simultaneously affect on Transfer Pricing. The second hypothesis shows that Foreign Ownership has a significant effect on Transfer Pricing. The third hypothesis shows that the Bonus Mechanism has no significant effect on Transfer Pricing. The fourth hypothesis shows that Tax Expense has no significant effect on Transfer Pricing.

REFERENCES

Alvia Kurnila, D. P. (2024). PENGARUH BEBAN PAJAK, KEPEMILIKAN ASING, DAN UKURANPERUSAHAAN TERHADAP TRANSFER PRICING. LAWSUIT Jurnal Perpajakan Vol. 3 No. 1 ISSN: 2828-0709.

Dwi Hertanto, A. M. (2023). Pengaruh Effective Tax Rate, Mekanisme Bonus, dan Tunneling Incentive terhadap Trasnfer Pricing (Studi Empiris pada Perusahaan Manufaktur yang Terdaftar di Bursa Efek Indonesia Tahun (2017-2021). JURNAL ECONOMINA Volume 2, Nomor 2, e-ISSN: 2963-1181.

Chaidir Djohar., d. S. (2022). Pengaruh Profitabilitas, Debt Covenant Dan Mekanisme Bonus Terhadap Transfer Pricing. Yudishtira Journal : Indonesian Journal of Finance and Strategy Inside p-ISSN: 2797-9733 | e-ISSN: 2777-0540 Vol. 2 No. 2.

Denny, D. H. (2024). ANALISIS PENGARUH BEBAN PAJAK, PROFITABILITAS, MEKANISME BONUS DAN EXCHANGE RATE TERHADAP TRANSFER PRICING PADA PERUSAHAAN SEKTOR BARANG BAKU DI BURSA EFEK INDONESIA. JURNAL REVENUE : Jural Akuntansi Volume 5 Nomor 1 Tahun.

Dian Nafiati, A. K. ((2023)). Pengaruh Beban Pajak, Exchange Rate, dan Perencanaan Pajak Terhadap Keputusan Melakukan Transfer Pricing. Management Studies and Entrepreneurship Journal (MSEJ), Vol. 4 No. 6.

Dinar Ambarita, R. M. (2024). The Effect of Tax, Audit Quality and Multinationality on Transfer Pricing. JOLASTIC, E-ISSN:2807-6311,P-ISSN:2807-6494.

Dwiko, H. (2023). Pengaruh Beban Pajak, Tunneling Incentive Dan Debt Covenant Terhadap Transfer Pricing Pada Perusahaan Sub Sektor Makanan Dan Minuman. Jurnal Administrasi Bisnis, JAMBIS Vol 3 Adbispreneur, 3 (1), pp. 62-71, 60-71.

Eli Putri Anggriani, H. D. (2024). Pengaruh Pajak dan Mekanisme Bonus Terhadap Transfer Pricing pada perusahaan sektor Manufatur sub sektor makanan dan minuman yang terdaftar di Bursa Efek Indonesia Tahun 2018-2022. Jurnal Review Pendidikan dan Pengajaran P-2655-710X e-ISSN 2655-6022.

Farahiyah Alfira, S. N. (2024). Pengaruh Transfer Pricing Terhadap Kepatuhan Pajak. Owner: Riset & Jurnal Akuntansi e –ISSN : 2548-9224 | p–ISSN : 2548-7507.

Heru Ravensky, T. A. (2021). Pengaruh Beban Pajak, Mekanisme Bonus, dan Ukuran Perusahaan terhadap Transfer Pricing (Studi Empiris) pada perusahaan manufaktur sektor makanan dan minuman yang terdaftar di BEI Tahun (2017 - 2019). Prosiding Seminar Nasional, e-ISSN; 2789-8805.

Indra Cahya Kusuma, Y. P. (2022). Pengaruh Pajak, Kepemlikan Asing, dan Tunneling Incentive terhadap Transfer Pricing (Studi Pada Perusahaan Sektor Industri Dasar dan Kimia di BEI Periode (2017-2020). Program Studi Akuntansi Fakultas Ekonomi Universitas Djuanda , Volume 1 Nomor 1, e-ISSN: 2963-590x.

Juarsa Badri, N. A. (2021). Pengaruh Minimalisi Pajak, Mekanisme Bonus, dan Kepemilikan Asing terhadap Transfer Pricing pada Perusahaan Manufaktur Multinasional yang terdaftar di BEI. Jurnal Profita: Akuntansi dan Bisnis 2(1), e-ISSN: 2746-0274 Vol 2, No 1, 1-15.

Kusuma Sari Ratna, F. S. (2018). Pengaruh Pajak, Kepemilikan Asing dan Ukuran Perusahaan terhadap Transfer Pricing. Prosiding Akuntansi ISSN: 2460-6561 Vol. 4, No.2.

Melmusi, Z. (2016). Pengaruh pajak, mekanisme bonus, kepemilikan asing dan ukuran perusahaan terhadap transfer pricing pada perusahaan yang tergabung dalam Jakarta Islamic Index dan terdaftar di Bursa Efek Indonesia Periode 2012-2016. . Jurnal EKOBISTEK Fakultas Ekonomi, 1-12.

Michelle Filantropy Mineri, M. P. (2021). Pengaruh Pajak, Tunneling Incentive, Mekanisme Bonus dan Profitabilitas terhadap Transfer Pricing. Jurnal Analisa Akutansi dan Perpajakan, 35-4.

Refgia, T. e. (2017). Pengaruh Pajak, Mekanisme Bonus, Ukuran Perusahaan, Kepemilikan Asing, Dan Tunneling Incentive Terhadap Transfer Pricing (Perusahaan Sektor Industri Dasar Dan Kimia Yang Listing Di Bei Tahun 2011-2014). Jurnal Online Mahasiswa Fakultas Ekonomi Universitas Riau, vol. 4, no. 1, Feb. 2017, pp. 543-555.

Rini, K. C. (2022). Pengaruh Pajak, Kepemlikan Asing, dan Tunneling Incentive terhadap Transfer Pricing (Studi Pada Perusahaan Sektor Industri Dasar dan Kimia di BEI Periode (2017-2020). Karimah Tauhid, Volume 1 Nomor 1, e-ISSN: 2963-590X.

Risca Amelia, A. G. (2022). Pengaruh Beban Pajak, Mekanisme Bonus, dan Kepemilikan Asing terhadap Transfer Pricing (Studi Kasus pada Perusahaan Pertambangan yang Terdaftar di Bursa Efek Indonesia Periode (2016-2020). YUME : Journal of Management, ISSN: 2614-851X, 62-72.

Scott, W. R. (2015). Financial Accounting Theory (7th ed.). Pearson Education.

Tongam Sinambela, T. D. (2023). Pengaruh Pajak, Kepemilikan Asing Terhadap Keputusan Transfer Pricing. Jurnal Pajak dan Bisnis (Journal of Tax and Business).

Wendy Salim Saputra, C. A. (2020). Pengaruh Pajak, Exchange Rate Dan Kepemilikan Asing Terhadap Transfer Pricing. Jurnal Manajemen Strategi dan Aplikasi Bisnis, eISSN: 2655 - 237X, 109 – 116.

Wiwit Irawati, W. R. (2021). TRANSFER PRICING: PAJAK, MEKANISME BONUS, KONTRAK HUTANG, NILAI TUKAR DAN MULTINASIONALITAS. Jurnal Akuntansi Berkelanjutan Indonesia ISSN 2615-7896.