

DAFTAR PUSTAKA

Aeny, Suci Noor 2017, Apa Itu Tax Treaty? (www.news.ddtc.co.id) diakses 20 Mei 2019.

Amidu, Mohammed, William Coffie & Philomina Acquah 2017, ‘Transfer pricing, earnings management and tax avoidance of firms in Ghana,’ *Journal of Financial Crime*, vol. 26, no. 2.

Armstrong, Christopher S, Stephen Glaeser & John D Kepler 2019, ‘Strategic Reactions in Corporate Tax Planning,’ *Journal of Accounting and Economics*, DOI: <https://doi.org/10.1016/j.jacceco.2019.03.003>.

Balafoutas, Loukas, Adrian Beck, Rudolf Kerschbamer, Matthias Sutter 2015, ‘The hidden costs of tax evasion. Collaborative tax evasion in markets for expert services,’ *Journal of Public Economics*, vol. 129, pp. 14 – 25.

Blaufus, Kay, Axel Möhlmann & Alexander N Schwäbe 2019, ‘Stock price reactions to news about corporate tax avoidance and evasion,’ *Journal of Economic Psychology*, vol. 72, pp. 278-292.

Bradshaw, Mark, Guanmin Liao & Mark Shuai Ma 2018, ‘Agency costs and tax planning when the government is a major Shareholder,’ *Journal of Accounting and Economics*, DOI: doi.org/10.1016/j.jacceco.2018.10.002.

Chan, C, S P Landry & T Jalbert 2002, ‘Effects of exchange rate on international transfer pricing decisions,’ *International Business & Economics Research Journal*, vol. 3 no. 3 pp. 35-48.

Charef, Fahima & Fethi Ayachi 2018, ‘Non-linear causality between exchange rates, inflation, interest rate differential and terms of trade in Tunisia,’ *African Journal of Economic and Management Studies*, vol. 9, iss 3, pp. 274 – 289.

Demian, Calin-Vlad & Filippo di Mauro 2018, ‘The exchange rate, asymmetric shocks and asymmetric distributions,’ *International Economics*, vol. 154, August 2018, pp. 68 – 85.

Direktur Jenderal Pajak 1995, Surat Edaran Nomor SE – 18/PJ.53/1995 Tentang Pengertian Hubungan Istimewa Seri PPN 16-95.

Direktur Jenderal Pajak 2009, Peraturan Direktur Jenderal Pajak Nomor PER – 61/PJ/2009 Tentang Tata Cara Penerapan Persetujuan Penghindaran Pajak Berganda.

Direktur Jenderal Pajak 2011, Peraturan Direktur Jenderal Pajak Nomor PER – 32/PJ/2011 Tentang Perubahan Atas Peraturan Direktur Jenderal Pajak Nomor PER – 43/PJ/2010 Tentang Penerapan Prinsip Kewajaran dan Kelaziman Usaha Dalam Transaksi Antara Wajib Pajak Dengan Pihak Yang Mempunyai Hubungan Istimewa.

Direktur Jenderal Pajak 2017, Peraturan Direktur Jenderal Pajak Nomor PER – 10 /PJ/2017 Tentang Tata Cara Penerapan Persetujuan Penghindaran Pajak Berganda.

Duan, Tinghua, Rong Ding, Wenxuan Hou & John Ziyang Zhang 2018, ‘The burden of attention: CEO publicity and tax avoidance,’ *Journal of Business Research*, vol. 87, pp. 90-101.

Fahmi, Irham 2013, *Analisis Laporan Keuangan*, Bandung: Alfabeta.

Gao, Lu & Xuan Zhao 2015, ‘Determining intra-company transfer pricing for multinational corporations,’ *International Journal of Production Economics*, vol. 168, pp. 340-350.

Ghozali, Imam 2018, *Aplikasi analisis multivariete dengan program IBM SPSS 25*, Semarang: Badan Penerbit Universitas Diponegoro.

Guenther, David A, Steven R Matsunaga & Brian M Williams 2017, ‘Is Tax Avoidance Related to Firm Risk?’ *The Accounting Review*, vol. 92, no. 1, pp. 115-136.

Harahap, Sofyan Syafri 2011, *Teori Akuntansi Edisi Revisi*, Jakarta: Rajawali Pers.

Harahap, Sofyan Syafri 2013, *Analisis Kritis Atas Laporan Keuangan Cetakan Kesebelas*, Jakarta: Rajawali Pers.

Hearson, Martin & Jalia Kangave 2016, ‘A Review of Uganda’s Tax Treaties and Recommendations for Action,’ *ICTD Working Paper 5*. ISBN: 978-178118-295-6.

Holtzman, Yair, Paul Nagel 2014, ‘An introduction to transfer pricing,’ *Journal of Management Development*, vol. 33, Iss. 1, pp. 57-61.

Hussein, Mohamed E, Michael Kraten, Gim S Seow & Kinsun Tam 2017, ‘Influences of culture on transfer price negotiation,’ *The International Journal of Accounting*, vol. 52, no. 3, pp. 227-237.

Ikatan Akuntansi Indonesia 2015, *PSAK No. 7 Tentang Pengungkapan Pihak – Pihak Yang Mempunyai Hubungan Istimewa*. Jakarta: IAI.

Ikatan Akuntansi Indonesia 2009, *PSAK No.15 Tentang Investasi Pada Entitas Asosiasi*. Jakarta: IAI.

Ikatan Akuntansi Indonesia 2009, *PSAK No. 46 Tentang Pajak Penghasilan*. Jakarta: IAI.

Kasmir 2018, *Analisis Laporan Keuangan Cetakan 11*, Jakarta: Rajawali Pers.

Kementrian Keuangan Republik Indonesia 2010, Publikasi Artikel dan Opini Tentang Rekonstruksi Kebijakan P3B Indonesia, (www.kemenkeu.go.id/publikasi/artikel-dan-opini/rekonstruksi-kebijakan-p3b-indonesia) diakses 16 Mei 2019.

Kementrian Keuangan Republik Indonesia 2016, Peraturan Menteri Keuangan PMK No. 213/PMK.03/2016 Tentang Jenis Dokumen dan/ atau Informasi Tambahan Yang Wajib Disimpan Oleh Wajib Pajak Yang Melakukan Transaksi Dengan Para Pihak Yang Mempunyai Hubungan Istimewa, dan Tata Cara Pengelolaannya.

Klassen, Kenneth, Petro Lisowsky & Devan Mescall 2013, ‘Transfer pricing: Strategies, practices, and tax minimization,’ *Contemporary Accounting Research*, vol. 34, no. 1, 2017.

Kovermann, Jost, Martin Wendt 2019, ‘Tax avoidance in family firms: Evidence from large private firms,’ *Journal of Contemporary Accounting & Economics*, vol. 15, iss. 2, pp. 145-157.

Marfuan & Andri Puren Noor Azizah 2014, ‘Pengaruh pajak, tunneling incentive dan exchange rate pada keputusan transfer pricing perusahaan,’ *Jurnal Akuntansi dan Auditing Indonesia*, vol. 18 no. 2 pp. 156-165.

Martins, Antonio F 2017, ‘Accounting information and its impact in transfer pricing tax compliance: a Portuguese view,’ *EuroMed Journal of Business*, vol. 12, iss. 2.

Muhammad, Abdul Haris, Zahir Ahmed & Ahsan Habib 2016, ‘Multinational transfer pricing of intangible assets: Indonesian tax auditors’ perspectives,’ *Asian Review of Accounting*, vol. 2, issue. 3, pp. 313-337.

Organisation For Economic Co-Operation and Development (OECD), *Centre For Tax Policy and Administration*. Paris: OECD.

Organisation For Economic Co-Operation and Development (OECD) 2017, *Transfer Pricing Guidelines*, Paris: OECD.

Organisation For Economic Co-Operation and Development (OECD) 1979, *Transfer Pricing and Multinational Enterprises*, Paris: OECD.

Organisation For Economic Co-Operation and Development (OECD) 2014, *Model Tax Convention on Income and on Capital. Article 9 Concerning The Taxation Of Associated Enterprises*, Paris: OECD.

Pappa, Evi, Rana Sajedi & Eugenia Vella 2014, ‘Fiscal consolidation with tax evasion and corruption,’ *Journal of International Economics*, vol. 96, sup. 1, pp. S56-S57.

Pemerintah Indonesia, Undang-Undang Pajak Pertambahan Nilai Nomor 18 Tahun 2000 Pasal 2 Ayat 2 Tentang Hubungan Istimewa Diantara Wajib Pajak, Lembaran Negara RI, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2007, Undang – Undang Nomor 24 Tahun 2000 Tentang Perjanjian Internasional, Lembaran Negara RI No. 24 Tahun 2000, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2007, Undang – Undang Nomor 28 Tahun 2007 Tentang Ketentuan Umum dan Tata Cara Perpajakan KUP, Lembaran Negara RI No. 28 Tahun 2007, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2008, Undang-Undang Nomor 36 Tahun 2008 Pasal 18 Tentang Pajak Penghasilan, Lembaran Negara RI Tahun 2008, No. 36, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2008, Undang-Undang Nomor 36 Tahun 2008 Pasal 18 Ayat 1 Tentang Pajak Penghasilan, Lembaran Negara RI Tahun 2008, No. 36, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2008, Undang-Undang Nomor 36 Tahun 2008 Pasal 18 Ayat 3 Tentang Pajak Penghasilan, Lembaran Negara RI Tahun 2008, No. 36, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2008, Undang-Undang Nomor 36 Tahun 2008 Pasal 18 Ayat 4 Tentang Pajak Penghasilan, Lembaran Negara RI Tahun 2008, No. 36, Sekretariat Negara, Jakarta.

Pemerintah Indonesia 2010, Peraturan Pemerintah Republik Indonesia Nomor 94 Tahun 2010 Tentang Perhitungan Penghasilan Kena Pajak Dan Pelunasan Pajak Penghasilan Dalam Tahun Berjalan, Sekretariat Negara, Jakarta.

Pohan, Chairil Anwar 2016, *Manajemen perpajakan strategi perencanaan pajak dan bisnis*, Jakarta: PT Gramedia Pustaka Utama.

Resmi, Siti 2016, *Perpajakan: Teori dan Kasus Edisi 9 Buku 1*, Jakarta: Salemba Empat.

Resmi, Siti 2017, *Perpajakan: Teori dan Kasus Edisi 10 Buku 1*, Jakarta: Salemba Empat.

Richardson, Grant, Grantley Taylor & Roman Lanis 2013, ‘Determinant of transfer pricing aggressiveness: Empirical evidence from Australian firms,’ *Journal of Contemporary Accounting & Economics*, vol. 9, pp. 136 – 150.

Rossing, Christian Plesner, Martine Cools & Carsten Rohde 2017, ‘International transfer pricing in multinational enterprises,’ *Journal of Accounting Education*, vol. 39, pp. 55-67.

Sekaran, Uma & Bougie R 2017, *Metode penelitian untuk bisnis pendekatan pengembangan – keahlian*, Jakarta: Salemba Empat.

Siddique, Nur E Alam & Alim Al Ayub Ahmed 2015, ‘Congruence of competitive advantage and transfer pricing: A study on selected MNCs operating in bangladesh,’ *Asian Accounting and Auditing Advancement*, vol. 5, no. 2, pp. 119-126.

Suandy, Erly 2016, *Perencanaan Pajak Edisi 6*, Jakarta: Salemba Empat.

Taylor, Grantley & Grant Richardson 2014, ‘Incentives for corporate tax planning and reporting: Empirical evidence from Australia,’ *Journal of Contemporary Accounting and Economics*, vol. 10, pp. 1 – 15.

Vengesai, Edson & Farai Kwenda 2018, ‘The impact of leverage on discretionary investment: African evidence,’ *African Journal of Economic and Management Studies*, vol. 9 Issue: 1, pp. 108 – 125.

Waluyo 2016, *Akuntansi Pajak*. Jakarta: Salemba Empat.

Watts, Ross L & Jerold L Zimmerman 1978, ‘Towards a Positive Theory of the Determination of Accounting Standards,’ *The Accounting Review*, vol. 53, no. 1, pp. 112-134.

Watts, Ross L & Jerold L Zimmerman 1986, ‘Positive accounting theory,’ *Prentice Hall, New Jersey, United States Of America*.

Wrede, Matthias 2014, ‘Fair inheritance taxation in the presence of tax planning,’ *Journal of Behavioral and Experimental Economics*, vol. 51, pp. 12-18.

Yao, Jen Te 2013, ‘The arm’s length principle, transfer pricing, and location choices,’ *Journal of Economics and Business*, vol. 65, pp. 1-13.

Yiheyis, Zelealem & Jacob Musila 2018, ‘The dynamics of inflation, exchange rates and the trade balance in a small economy: The case of Uganda,’ *International Journal of Development Issues*, vol. 17, iss 2, pp. 246 – 264.

Zerihun, Mulatu Fekadu, Martinus C Breitenbach & Francis Kemegue 2016, ‘Exploring exchange rate based policy coordination in SADC,’ *Studies in Economics and Finance*, vol. 33, iss 4, pp. 576 – 594.