

Determination Of Tax Avoidance Factors With Transfer Pricing As A Moderation In FnB Sub-Sector Companies

¹Edi Pranoto, ²Devina Yulia Paramita

¹Magister Teknologi Informasi STMIK Jakarta STI&K, ²Fakultas Ekonomi Universitas Gunadarma

¹Jl. BRI Radio Dalam No. 17, Jakarta Selatan, ²Jl. Margonda Raya No. 100, Depok 16424

¹edi_pranoto@staff.jak-stik.ac.id, ²devinayulia03@gmail.com

Abstract

The purpose of this research is to analyse the effect of Deferred Tax Expenses, Sales Growth, and Earnings Persistence on Tax Avoidance with Transfer Pricing as a moderating variable in the food and beverage subsector from the IDX official website during the 2020-2024 period. Research methodology in this study uses a purposive sampling method based on criteria, so that a total sample of 13 companies was obtained with an observation period of 5 years and a total of 65 observations of the research sample. The data analysis used in this study is multiple linear regression test, hypothesis testing, and moderated regression analysis (MRA) with the help of the SPSS version 26 software program. Results obtained show that partially deferred tax expense and earnings persistence affect tax avoidance; sales growth does not affect tax avoidance. Simultaneously, deferred tax expense, sales growth, and earnings persistence affect tax avoidance. In MRA, transfer pricing can moderate the effect of earnings persistence on tax avoidance, while transfer pricing is not able to moderate the effect of deferred tax liability on tax avoidance, and transfer pricing is also not able to moderate the effect of sales growth on tax avoidance

Keywords : *deferred tax expense, earnings persistence, sales growth, tax avoidance, transfer pricing*

JEL Codes : H26, H25, G32

INTRODUCTION

Taxes are an obligation that must be paid to the government by individuals and companies in accordance with applicable law. They are enforced through legal mechanisms without providing direct compensation; the collected tax funds are used to support the prosperity of the state and society as a whole. Taxes are also the most important source of state revenue used by the government to finance the state budget. The tax sector contributes 75% to the state budget, with the remainder coming from other state revenues.

Table 1. Tax Revenue and Corporate Income Tax Revenue 2020-2024

Tax Revenue 2020 – 2024 (In Trillions of Rupiah)			
Year	Budget	Realization	% Realization
2020	1.198,83	1.072,11	89,43%
2021	1.229,59	1.278,65	103,99%
2022	1.484,96	1.716,76	115,61%
2023	1.818,24	1.867,87	102,73%
2024	1.921,95	1.931,61	100,50%
Corporate Income Tax Revenue 2020 – 2024 (In Trillions of Rupiah)			
Year	Budget	Realization	% Realization
2020	215,96	202,31	71,81%
2021	188,73	250,37	132,66%
2022	253,29	385,41	152,17%
2023	392,97	440,56	112,11%
2024	326,44	387,08	118,57%

Source: DJP Financial Report 2020 – 2024 (Audited)

Indonesia's tax revenues from 2020 to 2024 experienced fluctuating developments. At the beginning of the period, tax revenue realisation was still below the budget target, due to weakened economic activity and the impact of the COVID-19 pandemic, which hampered state revenues. Beginning in 2021, tax revenues showed a significant recovery, reflected in the realisation achievements exceeding budget targets. This increase was influenced, in part, by improving domestic and global economic conditions. In

2022 and 2023, the positive trend in tax revenues continued, with realisation rates above 100% of the budget.

The achievement of tax revenue realisation cannot be used as an indicator of optimal taxpayer compliance, as tax revenue continues to fluctuate. This condition indicates the persistence of non-compliance in the payment of tax obligations. The need for compliance from every taxpayer to comply with their tax obligations, along with an understanding of the importance of taxes for the continuity of national development, must be instilled to foster active public participation in supporting the nation's progress. However, significant challenges exist in the tax system. The conflicting interests between taxpayers who want to minimise their Tax expense and the government, which relies on tax revenue for state financing, encourage a tendency for taxpayers to reduce their tax payments, both legally and illegally. (Lestari & Kusmuriyanto, 2015).

Tax Avoidance is a strategy employed by taxpayers to reduce their Tax expense, exploiting weaknesses in the existing taxation regulatory system and policies. According to Hanlon & Heitzman (2010), tax avoidance is a scheme to reduce Tax expenses through legitimate mechanisms through tax planning, which includes tax management, tax planning, aggressive tax practices, and the use of tax protection. The primary trigger for tax avoidance by taxpayers is the implementation of the tax collection system in Indonesia, which adheres to a self-assessment system, granting taxpayers the authority to independently calculate and estimate the amount of tax they must pay. Through tax planning, taxpayers can estimate their tax obligations before the end of the tax period, thus making it possible to reduce their Tax expense, violating the provisions of tax laws and regulations (Isnaini & Handayani, 2024).

The risk that companies may experience if they engage in tax avoidance is a decline in the company's value in the eyes of the public and investors. This is because tax avoidance practices indirectly encourage companies to present financial statements that do not fully reflect the actual situation. Legally, this practice is not prohibited as long as it is carried out in accordance with applicable regulations and remains a concern for the government because it has the potential to significantly reduce state revenues. Legal tax avoidance measures taken by companies can be achieved by utilizing the recognition of deferred tax expenses. According to Erlin et al. (2023), deferred tax expenses are expenses arising from temporary differences between accounting profit and fiscal profit (profit based on tax calculations). The difference resulting from these differences in recognition will result in corrections, either positive or negative. A positive correction will create a deferred tax asset, while a negative correction will result in a deferred tax expense. When a deferred tax expense is recognized, a company's net income may appear lower, as this recognition is considered an expense in the financial statements. The amount of deferred tax reflects the length of time a company defers its tax payment obligations, indicating that company management is attempting to use this deferred Tax Expense as a tax avoidance strategy. However, if the amount of deferred tax payable in the medium term is quite large, the company must be aware of this and exercise caution and avoid overly active tax avoidance (Chrisandy & Simbolon, 2022). According to SZ Maharani et al. (2024), if a company has a deferred tax burden, it can engage in tax avoidance in the year the deferred Tax Expense arises.

LITERATURE REVIEW

Tax Management

Tax management is defined as a systematic and ongoing activity undertaken by taxpayers to manage all aspects of taxation in a regular, economical, effective, and efficient manner. The goal is to ensure optimal contribution to the sustainability of taxpayers' businesses and maintain compliance with state revenues. The ultimate goal of tax management is to optimise or minimize the tax burden. Achieving this goal requires not only systematic planning but also a directed and controlled process in terms of organisation, implementation, and monitoring. Tax management encompasses planning, organising, directing, coordinating, and supervising activities in the tax sector aimed at achieving efficiency, which means increasing profits or income (Ikatan Akuntan Indonesia, 2019).

Tax Avoidance

Taxes are state revenues that can be used to finance government programs to improve public welfare. While it is hoped that state revenues through taxes will increase, this is inversely proportional to companies' desires, as taxes are perceived as a burden that reduces the value of net profits received. This

difference in objectives is a factor that causes companies, as corporate taxpayers, to undertake various efforts to reduce the amount of tax payable through tax avoidance practices. According to Aditya et al. (2023), tax avoidance can be carried out through structured transaction schemes based on careful planning to remain within legal limits while optimizing tax efficiency. Tax avoidance is a strategy for taxpayers to legally reduce their tax obligations without violating the law. Because it is not illegal, this action is considered a legal practice, but if carried out excessively and exceeds applicable regulations, it can turn into tax evasion or tax evasion. This form of non-compliance carried out by taxpayers through tax avoidance is a resistance to tax obligations before the issuance of a Tax Assessment Letter. To date, this practice has not been clearly regulated in the law, triggering the formation of a loophole that allows companies to reduce their tax obligations to the lowest amount, without violating applicable tax provisions. In other words, companies pay a minimal amount of tax, not according to the tax amount that should be paid (Puspita, 2018).

In this study, tax avoidance is measured using the book tax difference (BTD), which is the difference between taxable profit according to tax regulations and pre-tax profit according to accounting standards. Accounting profit is calculated based on standards stipulated in PSAK, while fiscal profit refers to provisions in tax regulations. Accounting profit is the difference between total revenue and all expenses incurred in an accounting period. Meanwhile, fiscal profit, or taxable income, is generated through fiscal adjustments to pre-tax profit as stated in the company's commercial financial statements (Gunawan, 2019). The Book Tax Difference formula used is:

$$\text{Book Tax Difference} = \frac{\text{Accounting Profit} - \text{Fiscal Profit}}{\text{Total Asset}}$$

Book Tax Difference (BTD) is often used in research to analyze its impact on the quality of a company's reported earnings, particularly regarding earnings persistence in financial statements (Jati & Murwaningsari, 2020). The higher the BTD value, the more it indicates that the company is engaging in tax avoidance practices (Krisnadayu et al., 2021).

Deferred Tax Expense

Deferred tax is income tax that will be paid in the future due to differences in the timing of recognition between accounting and taxation (temporary differences). This difference results in a deferred tax expense, which arises from the difference between profit according to financial statements (accounting profit) and profit according to tax calculations (fiscal profit) (Mahmudah et al., 2019). This difference in recording is characterized by fiscal corrections arising from temporary differences between Financial Accounting Standards (SAK) and tax provisions, which then result in positive or negative corrections. Tax loss carryforwards also cause deferred tax, therefore they must be clearly presented in the financial statements, while also showing the difference between accounting profit and fiscal profit (Marlezza & Iswara, 2025). When the deferred tax expense increases, it is generally due to a negative correction of deferred taxes from previous periods, ultimately leading to an increase in the company's total tax burden. A large deferred tax expense will impact the amount of income tax because it increases the amount of current tax payable. Therefore, a higher deferred tax reporting, reflecting a delay in tax payments by a company, can be an indication of tax avoidance practices (Restu & Mu'arif, 2024). This variable is projected using the following formula:

$$\text{Deferred Tax Expense} = \frac{\text{Deferred Tax Expense (t)}}{\text{Total Asset (t-1)}}$$

Sales Growth

Sales growth is the result of comparing the difference between sales in the current year and the previous year. Sales growth reflects a company's ability to maintain its economic position from year to year (Putri et al., 2021). In general, every company aims to optimize profits. One way to achieve this goal is through stable and sustainable sales growth. According to Margie & Melinda (2024), sales growth is defined as an increase in sales from year to year. With sales growth, companies can estimate the potential profit they will earn in the future. To measure sales growth, use the following formula:

$$\text{Sales Growth} = \frac{\text{Sales (t)} - \text{Sales (t-1)}}{\text{Sales (t-1)}}$$

Earnings Persistence

Persistent earnings are earnings that tend to be stable and consistent over time, reflecting a company's ability to maintain its performance in the future. This is an important aspect because investors rely on earnings information to assess a company's future prospects. Furthermore, earnings persistence is used as a basis for estimating earnings in the following period, using current earnings as a benchmark (Syuhaibah & Sudiyatmoko, 2025). According to Rohit & Suhendah (2021), earnings persistence is expected to reflect the company's future condition and thus serve as a basis for making informed decisions, such as investment decisions, lending, or formulating policies or regulations to meet these expectations. Stakeholders expect consistent earnings to reduce their concerns about investment decisions (Asriyanti & Gunawan, 2020). Therefore, companies need to maintain high and persistent earnings so that stakeholders can make informed and accurate decisions. Tax avoidance by companies through reducing expenses or delaying revenue recognition, resulting in temporary differences. The existence of deferred taxes requires companies to pay their tax obligations in the future, which can reduce profits in future periods and cause profits to become less stable or persistent. This tax avoidance action also contributes to changes in pre-tax profits in future periods (Choiriyah, 2016). To project the extent of persistent profits for a company, the following calculation can be used:

$$\text{Earning Persistence} = \frac{\text{Earning Before Tax}}{\text{Average Total Assets}}$$

Transfer Pricing

Transfer pricing is a policy strategy implemented to determine the transfer value for a transaction related to the sale and purchase of goods, services, intangible assets, or other financial transactions by companies with special relationships (Herawaty & Anne, 2019). According to Rasyid et al. (2021), transfer pricing is a transaction pricing method commonly used by multinational companies. This involves setting the transaction price in such a way as to meet the company's objectives. In this study, transfer pricing uses the following calculation formula:

$$\text{Transfer Pricing} = \frac{\text{Accounts Receivable to Related Companies}}{\text{Total Receivable}}$$

This practice arises from transactions between divisions within a corporate group. This is generally done by raising purchase prices and lowering selling prices between companies within the same group entity. By implementing transfer pricing, companies can report losses, thereby avoiding tax obligations. Transfer pricing practices have different perspectives. From a managerial accounting perspective, it is a way to maximize corporate profits, while from a tax perspective, it serves as a policy in setting transfer or selling prices involving related parties (Marlezza & Iswara, 2025). Special relationships between companies are regulated in Article 18 paragraph (4) of the Income Tax Law, a special relationship is deemed to exist if a taxpayer has direct or indirect capital ownership of at least 25% in another taxpayer; if there is ownership of that amount in two or more taxpayers; or if there is a relationship between the last-mentioned taxpayers. Quoted from the website www.pajak.go.id, if a special relationship sale and purchase occurs, the Director General of Taxes has the authority to re-determine the amount of income, its deductions, and determine debts that are considered capital in calculating taxable income for taxpayers who have a special relationship with another party. This determination must be in accordance with the principles of fairness and business customs, namely reasonable business practices as usually carried out by independent parties without the influence of special relationships.

Research Model

This research model analyzes the influence of deferred tax burden, sales growth, and Earning Persistence on tax avoidance, with transfer pricing as a moderating variable. Moderating variables are used to strengthen or weaken the direct relationship between the independent and dependent variables.

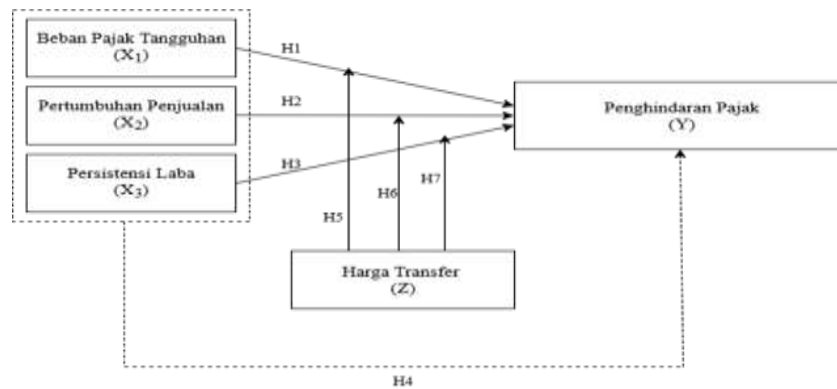


Figure 1. Research Model

RESEARCH METHOD

Population and Population Sampling Procedures

Based on the predetermined criteria, the population of companies in the food and beverage subsector was 50, while the sample size was 13 companies that met the criteria. Therefore, the sample used in this study was 65 companies with complete financial reports for the 2020-2024 period. The list of companies included in this study is as follows:

Table 2. Company Sample

No	Company Code	Company Name
1.	CEKA	Wilmar Cahaya Indonesia Tbk.
2.	CLEO	Sariguna Primatirta Tbk.
3.	CPIN	Charoen Pokphand Indonesia Tbk
4.	CPRO	Central Proteina Prima Tbk.
5.	GOOD	Garudafood Putra Putri Jaya Tbk.
6.	ICBP	Indofood CBP Sukses Makmur Tbk
7.	INDF	Indofood Sukses Makmur Tbk.
8.	JPFA	Japfa Comfeed Indonesia Tbk.
9.	KEJU	Mulia Boga Raya Tbk.
10.	MYOR	Mayora Indah Tbk.
11.	ROTI	Nippon Indosari Corpindo Tbk.
12.	STTP	Siantar Top Tbk.
13.	TBLA	Tunas Baru Lampung Tbk.

Analysis Techniques

This study employed descriptive statistical analysis and multiple linear regression as data analysis techniques, and also tested the formulated hypotheses. To use multiple linear regression analysis, the classical assumption test results must meet the requirements, including normality, multicollinearity, autocorrelation, and heteroscedasticity. The data processing used statistical software, SPSS version 26.

Multiple Linear Regression Analysis

Multiple linear regression analysis is intended to determine whether there is an influence between the independent variables X1 (Deferred Tax Expense), X2 (Sales Growth), and X3 (Earning Persistence) on the dependent variable Y (Tax Avoidance). The following is the multiple linear regression model equation used in the study:

$$Y = \alpha + \beta_1 X_1 + \beta_2 X_2 + \beta_3 X_3 + \epsilon$$

Information: Y=Tax Avoidance, α =constant, $\beta_1 - \beta_3$ = Regression Coefficient, X_1 = Deferred Tax Expense, X_2 = Sales Growth, X_3 = Earnings Persistence, ϵ = Standart error.

Partial Parameter Significance Test (T-Test)

The t-test, or partial test, is a statistical test that aims to determine the partial significance of the influence between independent variables on the dependent variable. The criteria used in making decisions regarding the t-test are as follows: a. If the t-count value $< t$ -table or $-t$ -count $> -t$ -table or the significance value > 0.05 then H_0 is accepted and H_1 is rejected, meaning that the independent variable does not have a partial effect on the dependent variable. If the t-count value $\geq t$ -table or $-t$ -count $\leq -t$ -table or the significance value < 0.05 then H_0 is rejected and H_1 is accepted, meaning that the independent variable has a partial effect on the dependent variable.

Simultaneous Parameter Significance Test (F Test)

According to (Riyanto & Hatmawan, 2020), the F statistical test aims to determine the interpretation of parameters together, which means how far the influence of independent variables on dependent variables together. a. If the calculated F value $< F$ table or the significance value > 0.05 , then H_0 is accepted and H_1 is rejected, meaning that the independent variable does not have a simultaneous effect on the dependent variable. b. If the calculated F value $\geq F$ table or the significance value < 0.05 , then H_0 is rejected and H_1 is accepted, meaning that the independent variable has a simultaneous effect on the dependent variable.

Test of Coefficient of Determination (R^2 Test)

The coefficient of determination (R^2) is a measure of the extent to which an independent variable can influence a dependent variable, as seen through the adjusted R^2 value. The R^2 value ranges from zero to one. A low R^2 value indicates that the independent variable's ability to explain variation in the dependent variable is very limited. Conversely, if the value is close to one, the independent variable is considered capable of providing almost complete information in predicting changes in the dependent variable. The main weakness of using the coefficient of determination is bias due to the number of independent variables included in the model. Adding one independent variable to a regression model will always increase the R^2 value, regardless of whether that variable has a significant effect on the dependent variable. Therefore, when selecting the most appropriate regression model, it is recommended to use the Adjusted R^2 value, as the Adjusted R^2 value can increase or decrease if one independent variable is added to the model (Ghozali, 2021).

Moderated Regression Analysis (MRA)

Moderated Regression Analysis (MRA) is an analytical approach used to maintain sample integrity and serve as a basis for controlling the influence of moderator variables (Ghozali, 2021). The purpose of this hypothesis testing is to determine how moderating variables, such as transfer prices, influence the primary variable. The equation model used in MRA analysis is:

$$Y = \alpha + \beta_1 X_1 + \beta_2 X_2 + \beta_3 X_3 + \beta_4 Z + \beta_5 X_1 Z + \beta_6 X_2 Z + \beta_7 X_3 Z + \epsilon$$

Information: Y =Tax Avoidance, α =constant, $\beta_1 - \beta_7$ = Regression Coefficient, X_1 = Deferred Tax Expense, X_2 = Sales Growth, X_3 = Earnings Persistence, Z = Transfer Pricing, $X_1 Z$ = Interaction Between Deferred Tax Expense and Transfer Prices, $X_2 Z$ = Interaction Between Sales Growth and Transfer Prices, $X_3 Z$ = The Interaction Between Earnings Persistence and Transfer Pricing, ϵ = Standart error.

RESULTS AND DISCUSSION**Research Data**

The data used in this study is secondary data in the form of annual financial reports of food and beverage sub-sector companies listed on the Indonesia Stock Exchange (IDX) for the 2020-2022 period, obtained from the official website of the Indonesia Stock Exchange and the official websites of each related company. The variables used in this study are the Independent Variable, namely Deferred Tax Expense, Sales Growth, and Earning Persistence; the Dependent Variable, namely Tax Avoidance; and the Moderating Variable, namely Transfer Pricing. The following is an example of the calculation of the variables used:

No	Company Code	Year	Deferred Tax Expense	Sales Growth	Earnings Persistence	Tax Avoidance	Transfer Pricing
			(X1)	(X2)	(X3)	(Y)	(Z)
1	CEKA	2020	0,0043	0,1645	0,1574	0,0206	0,7115
		2021	0,0008	0,4747	0,1448	0,0128	0,5862
		2022	0,0016	0,1463	0,1658	0,0068	0,7687
		2023	0,0010	0,0315	0,1084	0,0093	0,3718
		2024	0,0003	0,2628	0,1929	0,0078	0,4616
2	CLEO	2020	0,0056	-0,1035	0,1319	0,0286	0,9320
		2021	0,0057	0,1346	0,1730	0,0296	0,9725
		2022	0,0053	0,2312	0,1636	0,0197	0,9971
		2023	0,0051	0,5383	0,2066	0,0285	0,0066
		2024	0,0051	0,2903	0,2439	0,0378	0,0073
3	CPIN	2020	0,0044	-0,2749	0,1576	-0,0120	0,0125
		2021	0,0071	0,2159	0,1391	-0,0098	0,0048
		2022	0,0199	0,1000	0,0940	-0,0661	0,0123
		2023	0,0087	0,0835	0,0742	-0,0527	0,0237
		2024	0,0093	0,0951	0,1255	0,0151	0,0143
4	CPRO	2020	0,0386	0,0554	0,0317	-0,0794	0,0527
		2021	0,0001	0,0600	0,3574	0,2839	0,0247
		2022	0,0029	0,0267	0,0718	0,0658	0,0178
		2023	0,0003	0,0952	0,0763	0,0544	0,0134
		2024	0,0011	0,0280	0,0662	0,0506	0,0123
5	GOOD	2020	0,0007	-0,0852	0,0579	-0,0111	0,0952
		2021	0,0004	0,1399	0,0942	0,0291	0,1405
		2022	0,0003	0,1945	0,0957	0,0198	0,1788
		2023	0,0031	0,0031	0,1061	-0,0007	0,1253
		2024	0,0078	0,1605	0,1083	0,0212	0,1697
6	ICBP	2020	0,0001	0,1027	0,1401	0,0091	0,5755
		2021	0,0005	0,2179	0,0898	0,0383	0,5443
		2022	0,0006	0,1407	0,0645	0,0314	0,4981
		2023	0,0005	0,0480	0,0976	0,0150	0,4751
		2024	0,0003	0,0690	0,0938	0,0314	0,4797
7	INDF	2020	0,0025	0,0671	0,0959	0,0652	0,2302
		2021	0,0007	0,2155	0,0847	0,0741	0,2410
		2022	0,0008	0,1156	0,0685	0,0585	0,2104
		2023	0,0001	0,0079	0,0851	0,0715	0,1802
		2024	0,0003	0,0366	0,0878	0,0773	0,1718
8	JPFA	2020	0,0014	-0,0491	0,0638	0,0020	0,0079
		2021	0,0022	0,2141	0,1024	0,0151	0,0108
		2022	0,0063	0,0912	0,0638	-0,0042	0,0084
		2023	0,0028	0,0450	0,0378	0,0069	0,0082
		2024	0,0092	0,0904	0,1233	0,0715	0,0047
9	KEJU	2020	0,0078	-0,0180	0,2344	0,0239	0,2881
		2021	0,0084	0,0844	0,2540	-0,0226	0,3624
		2022	0,0006	0,0020	0,1848	0,0029	0,4383
		2023	0,0040	-0,0236	0,1220	-0,0186	0,7820

No	Company Code	Year	Deferred Tax Expense	Sales Growth	Earnings Persistence	Tax Avoidance	Transfer Pricing
			(X1)	(X2)	(X3)	(Y)	(Z)
10	MYOR	2024	0,0116	0,2399	0,2064	-0,0366	0,7490
		2020	0,0005	-0,0220	0,1383	0,0637	0,9469
		2021	0,0021	0,1400	0,0781	0,0499	0,9134
		2022	0,0007	0,0991	0,1188	0,0431	0,9290
		2023	0,0011	0,0266	0,1774	0,0687	0,9437
		2024	0,0004	0,1457	0,1448	0,0745	0,9282
11	ROTI	2020	0,0027	-0,0375	0,0351	0,0347	0,4136
		2021	0,0044	0,0235	0,0877	0,0085	0,4808
		2022	0,0031	0,1970	0,1377	0,0072	0,4867
		2023	0,0005	-0,0291	0,1060	0,0020	0,4883
		2024	0,0009	0,0292	0,1220	0,0023	0,4638
		2020	0,0024	0,0950	0,2444	-0,0075	0,6533
12	STTP	2021	0,0024	0,1028	0,2077	0,0083	0,5859
		2022	0,0024	0,1626	0,1778	0,0026	0,6012
		2023	0,0023	-0,0333	0,2189	0,0137	0,5687
		2024	0,0047	0,0404	0,2465	0,0517	0,6571
		2020	0,0041	-0,2070	0,0490	0,0290	0,5295
		2021	0,0024	-0,3199	0,0505	0,0252	0,5720
13	TBLA	2022	0,0014	-0,0367	0,0456	0,0229	0,5944
		2023	0,0002	0,0824	0,0317	0,0202	0,6760
		2024	0,0007	-0,1202	0,0337	0,0215	0,6754

Multiple Linear Regression Results

Table 4. Multiple Linear Regression Results

Coefficients ^a						
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	,015	,011		1,386	,171
	Deferred Tax Expense	-3,731	,885	-,456	-4,216	,000
	Sales Growth	-,019	,037	-,058	-,515	,608
	Earning Persistence	,192	,078	,277	2,456	,017
a. Dependent Variable: Tax Avoidance						

Tax Avoidance = 0,015 – 3,731DTE – 0,019SG + 0,192EP + €, interpreted as: 1. The constant value (a) is 0.015, indicating a positive relationship with the independent variable, thus indicating a unidirectional influence between the independent and dependent variables. This indicates that if the independent variables, namely deferred tax burden, sales growth, and Earning Persistence, are 0, then the value of tax avoidance as the dependent variable is 0.015., 2. The Deferred Tax Expense variable has a negative regression coefficient of -3.731. This indicates that if the deferred Tax Expense variable increases by 1%, the tax avoidance variable will experience a decrease of -3.731, assuming the other independent variables remain constant., 3. The Sales Growth variable has a negative regression coefficient of -0.019. This indicates that if the sales growth variable increases by 1%, the tax avoidance variable will experience a decrease in value of -0.019, assuming the other independent variables remain constant., 4. The Earning

Persistence variable has a positive regression coefficient of 0.192. This indicates that if the Earning Persistence variable increases by 1%, the tax avoidance variable will increase by 0.192, assuming the other independent variables remain constant.

Partial Parameter Significance Test (T-Test)

Table 5. Partial Parameter Significance Test (T-Test) Results

Coefficients ^a						
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	,015	,011		1,386	,171
	Deferred Tax Expense	-3,731	,885	-,456	-4,216	,000
	Sales Growth	-,019	,037	-,058	-,515	,608
	Earning Persistence	,192	,078	,277	2,456	,017
a. Dependent Variable: Tax Avoidance						

The results of hypothesis testing using the T test can be explained as follows: 1. The results of the T-test on the deferred Tax Expense variable against the tax avoidance variable show that the significance value is $0.000 < 0.05$, while $T_{hitung} -4.216 < T_{tabel} -1.99962$. From these results, it can be concluded that the deferred Tax Expense has a partial effect on tax avoidance. 2. The results of the T-test on the sales growth variable against the tax avoidance variable show that the significance value is $0.608 > 0.05$, while $T_{hitung} -0.515 > T_{tabel} -1.99962$. From these results, it can be concluded that sales growth does not have a partial effect on tax avoidance. 3. The results of the T-test on the Earning Persistence variable against the tax avoidance variable show that the significance value is $0.017 < 0.05$, while $T_{hitung} 2.456 > T_{tabel} 1.99962$. From these results, it can be concluded that Earning Persistence has a partial effect on tax avoidance.

Simultaneous Parameter Significance Test (F Test)

Table 6. Simultaneous Parameter Significance Test (F Test) Results

ANOVA ^a						
Model		Sum of Squares	df	Mean Square	F	Sig.
1	Regression	,039	3	,013	8,282	,000 ^b
	Residual	,096	61	,002		
	Total	,136	64			
a. Dependent Variable: Tax Avoidance						
b. Predictors: (Constant), Deferred Tax Expense, Sales Growth, Earning Persistence						

Based on the results of the F test, the calculated F value was $8.282 > F_{table}$ of 2.75 with a significance value of $0.000 < 0.05$. This indicates that deferred tax expense, sales growth, and earning persistence have a simultaneous effect on tax avoidance.

Test of Determination Coefficient (R^2 Test)

Table 7. Test of Determination Coefficient (R^2 Test) Results

Model Summary ^b				
Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	,538 ^a	,289	,254	,0397612
a. Predictors: (Constant), Deferred Tax Expense, Sales Growth, Earning Persistence				
b. Dependent Variable: Tax Avoidance				

The results of the coefficient of determination test show that the correlation coefficient value R is 0.538 so that there is a fairly strong relationship between the independent variable and the dependent variable of 53.8%. While for the Adjusted R square, the value obtained is 0.254 or 25.4%, this means that the dependent variable, namely, deferred tax burden, sales growth, and Earning Persistence is able to influence the independent variable, namely, tax avoidance by 25.4% while the remaining 74.6% (100% - 25.4%) is influenced by other variables not tested in this study.

Moderated Regression Analysis (MRA)

Table 8. Moderated Regression Analysis (MRA) Results

Coefficients ^a						
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	-,013	,016		-,802	,426
	Deferred Tax Expense	-3,247	1,016	-,397	-3,196	,002
	Sales Growth	-,030	,054	-,093	-,562	,577
	Earning Persistence	,482	,113	,696	4,283	,000
	Transfer Pricing	,090	,038	,625	2,359	,022
	DTE*TP	-,472	4,314	-,017	-,109	,913
	SG*TP	,039	,114	,062	,345	,731
	EP*TP	-,842	,273	-,992	-3,086	,003
a. Dependent Variable: Tax Avoidance						

$$TA = -0,013 - 3,246DTE - 0,030SG + 0,482EP + 0,090TP - 0,472DTE*TP + 0,039SG*TP - 0,842EP*TP$$

The results of the Moderated Regression Analysis (MRA) test above can be explained as follows: 1. The interaction between transfer prices and deferred tax burdens shows a significance value of 0.913 > 0.05, while Thitung -0.109 > Ttabel -2.00247. From these results, it can be concluded that transfer prices are unable to moderate the influence of deferred tax burdens on tax avoidance; 2. The interaction between transfer prices and sales growth shows that the significance value is 0.731 > 0.05, while Tcount is 0.345 < Ttable 2.00247. From these results, it can be concluded that transfer prices are not able to moderate the effect of sales growth on tax avoidance; 3. The interaction between transfer prices and Earning Persistence shows a significance value of 0.003 < 0.05, while Thitung -3.086 < Ttabel -2.00247. From these results, it can be concluded that transfer prices can moderate the effect of Earning Persistence on tax avoidance.

CONCLUSION AND SUGGESTION

Conclusion

Deferred Tax Expense partially has a significant negative effect on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. These results are in line with research conducted by Silviana & Sumantri (2023), which explains that deferred tax expense has a negative and significant effect on tax avoidance, because the higher the reporting of deferred taxes or the company's deferred tax burden as measured by the allocation of taxes between periods will affect the company's tax avoidance, the higher the allocation between periods means the smaller the tax avoidance practices carried out by the company. Contrary to research, Marlezza & Iswara (2025) found that the deferred tax burden does not affect tax avoidance, because a large deferred tax burden only has the effect of reducing the company's room for manoeuvre, not for tax avoidance, because this tax must still be paid in the future period.

Partial sales growth has a significant negative effect on tax avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. The results of this study align with those of Fadilah & Ambarita (2024), who stated that sales growth has no effect on tax avoidance because increased sales in a company are not always accompanied by increased profits. However, this contrasts with research by Uliganda & Hermi (2024), which found that sales growth has a partial positive effect on tax avoidance.

Earning Persistence partially has a significant positive effect on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. The results of this study align with research conducted by Efendy (2023), which states that earnings persistence has a positive effect on tax avoidance. Companies with high annual earnings persistence are often sought by many investors. This is because earnings persistence is a profit that has the ability to indicate future earnings due to its predictive value, allowing it to assess the quality of earnings reported by management. This can increase demand for a company's shares, which indirectly increases share prices and ultimately leads to increased tax avoidance because higher profits attract more investors to invest in the company. This contrasts with research by Yulanda et al. (2024), which concluded that earnings persistence has a negative effect on tax avoidance.

Deferred Tax Burden, Sales Growth, and Earning Persistence simultaneously have a significant positive effect on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. This shows the ability of the independent variables, namely deferred tax burden, sales growth, and profit persistence in explaining variations in changes to the dependent variable, namely tax avoidance, by 25.4%, while the remaining 74.6% is influenced by other variables not tested in this study.

Transfer Pricing cannot moderate the effect of Deferred Tax Expenses on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. This study explains that transfer pricing, as a moderating variable, is unable to strengthen or weaken the relationship between deferred tax burden and tax avoidance. Although a company has a high deferred tax burden, it does not necessarily mean that the company is attempting to avoid tax through transfer pricing. Transfer pricing methods are often used only to regulate internal transactions between entities within a group, such as between a parent and subsidiary in the purchase of raw materials or the sale of products, with the aim of reducing costs and optimizing the use of internal resources. The non-use of transfer pricing can also be due to other strategies considered more legally secure, such as delaying revenue recognition or utilizing available tax incentives and facilities. Companies also consider the interests of other parties, such as the government, the public, and investors as stakeholders, to be more cautious in making decisions that could undermine public trust.

Transfer Pricing cannot moderate the effect of Sales Growth on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. Transfer pricing as a moderating variable is unable to strengthen or weaken the influence of sales growth on tax avoidance. Research conducted by Nadhifah & Arif (2020) found that sales growth significantly impacts a company's ability to maintain profits, particularly in relation to transfer pricing practices. However, according to Farahiyah & Suhardianto (2024), high sales growth does not always reflect high profits, as it is often accompanied by increased costs and operating expenses. Under these conditions, sales growth is not necessarily a definitive indicator of tax avoidance. Companies need to first evaluate the extent of accounting profit generated from sales growth. If the resulting profit allows for tax avoidance through transfer pricing, the company can exploit it. A key consideration in determining transfer pricing is the strict oversight by tax authorities of affiliated transactions, as regulated in PMK 172/2023, which explains that transactions involving special relationships must be treated as if they were independent entities and transacted at arm's length. If the transaction does not reflect market prices, the resulting profit may be unreasonable, which may ultimately affect the amount of tax to be paid.

Transfer Pricing can moderate by weakening the influence of Earning Persistence on Tax Avoidance in food and beverage sub-sector companies listed on the Indonesia Stock Exchange for the 2020-2024 period. Transfer pricing as a moderating variable weakens the influence of profit persistence on tax avoidance. Companies with persistent profits tend to maintain the stability of their financial statements, particularly to reduce their tax burden by engaging in tax avoidance practices as a strategy to maintain profit stability. In this case, transfer pricing emerges as one of the tax avoidance strategies employed by companies. However, because the results of this study weaken the influence of profit persistence on tax avoidance, companies engage in transfer pricing to reduce their tax burden. The goal is not directly to maintain profit stability but to achieve tax efficiency through a more structured tax planning strategy, so that profit persistence is not the goal of companies engaging in tax avoidance practices. Companies with

affiliates or special relationships benefit more because they have greater flexibility in utilizing transfer pricing to save tax burdens without violating the law.

Suggestion

1. Company management needs to understand how to manage and plan taxes properly, as well as disclose deferred taxes transparently, because proper management can reduce the tendency for tax avoidance while increasing stakeholder trust.
2. Efforts to maintain consistent profits should be made by improving company performance, for example by saving production costs and optimizing work results, not just by reducing tax obligations, so as not to create legal or reputational risks.
3. Regulators need to be more careful in monitoring factors that give rise to tax avoidance practices, while investors and creditors can assess the quality and responsibility of a company from its financial performance and tax compliance.

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