



The Influence of Profit Management, Transfer Pricing, and Capital Intensity on Tax Avoidance with Company Size as a Moderation Variable

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This research aims to determine the effect of earnings management, transfer pricing, and capital intensity on tax avoidance with company size as a moderating variable. The research objects used in this research are manufacturing companies listed on the Indonesia Stock Exchange (BEI) in 2018-2023. This research is a type of quantitative research with multiple linear regression models and Moderated Regression Analysis (MRA). In selecting samples that met the criteria, 30 companies were obtained. This research uses secondary data based on manufacturing company financial reports obtained from the Indonesia Stock Exchange website and related company websites. Data processing was carried out using the SPSS 25 application program. Partial research results showed that earnings management had an effect on tax avoidance, transfer pricing had an effect on tax avoidance, capital intensity had no effect on tax avoidance while moderated regression analysis (MRA) testing showed that company size moderated the effect of earnings management on tax avoidance, company size cannot moderate the effect of transfer pricing on tax avoidance, and company size cannot moderate the effect of capital intensity on tax avoidance.

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INTRODUCTION

Tax avoidance is part of tax planning, which is the process of controlling actions to avoid the undesirable consequences of tax imposition. Tax avoidance is a form or scheme of tax avoidance with the aim of minimizing the tax burden by exploiting loopholes in a country's tax provisions. For the government, taxes are an important source of revenue which is used to finance routine and development expenditures. Meanwhile, for companies, taxes are a burden that will reduce the company's net profit. The problem of tax avoidance is a complicated and unique problem because in this case tax avoidance does not violate the law (legal). However, on the other hand, this tax avoidance action is not expected by the government.

Data according to APBN bulletin Vol. VIII edition 18 September 2023 Indonesia's tax ratio in 2022 is 10.39% and only moves 9-12% according to the IMF, ideally a country's Tax Ratio is 15% and the Tax Ratio of developed countries is on average above 30% compared to other countries Indonesia's ASEAN Tax Ratio is also the lowest. A low tax ratio in Indonesia could indicate that tax revenues are not yet optimal and does not rule out the possibility that there is an indication of tax avoidance because it has the potential to reduce state revenues and impact development and economic growth in Indonesia. There are several cases or phenomena related to tax avoidance, namely PT. Bentoel Internasional Investama which makes the state lose US\$ 14 million per year, then the manufacturing company PT Adaro Energi Tbk in 2019 which carried out tax avoidance using a transfer pricing scheme.

THEORETICAL BASIS

According to [Jensen and Meckling \(1976\)](#), agency theory explains the existence of conflicts that will arise between company owners and management. The separation between the owner and the management of the company can cause problems, including the possibility of the manager taking actions that are not in accordance with the wishes or interests of the principle. This is in line with what was stated by [\(Shapiro, 2005\)](#) that management does not always act in accordance with the interests of shareholders because management definitely has personal interests. This is what underlies the conflict of interest between shareholders and management. Problems will also arise for tax collectors (fiscus) and tax payers (agents). Where the tax collector representing the state wants

large tax revenues from the company, but company management (agents) want high profit income to obtain incentives.

The Effect Of Profit Management On Tax Avoidance

Manager bonuses are earned before pre-tax income and shareholders want low tax payments in order to increase profits per share which will later be distributed. This encourages managers to avoid tax, namely maximizing the amount of tax that must be paid legally in order to achieve the manager's goals and fulfill the wishes of company owners who tend to want to obtain as much income as possible with the lowest possible expenditure. The greater the income earned by a company, the greater the tax burden that must be paid from company profits, so managers carry out earnings management. Earnings management can influence corporate tax avoidance because earnings management can minimize the corporate tax burden. [\(Zubaidah & Satvawan 2017\)](#).

The Effect Of Transfer Pricing On Tax Avoidance

Companies can apply sales transaction schemes at lower prices to companies with special relationships compared to independent parties. Transactions are not carried out according to the principles of fairness and business practice. The aim is for the originating company to reduce business turnover so that the tax burden paid will be lower. The target company takes advantage of lower tax rates so that the tax burden paid is lower because the company carries out transfer pricing practices in order to circumvent the amount of profit so that tax payments to the state are low. This is what will become a conflict between the tax authorities as tax collectors. and Company management. [\(Nurrahmi & Rahayu, 2020\)](#).

The Effect Of Capital Intensity On Tax Avoidance

In this case, management can take advantage of depreciation of fixed assets to reduce the company's tax burden. Managers will invest the company's idle funds in the form of fixed assets, with the aim of utilizing depreciation as a reduction in the tax burden. So the company's performance will increase due to a reduction in the tax burden, and the desired manager performance compensation will be achieved. With this, there is a conflict between tax collectors (fiscus) who

want as much income as possible from tax collection, while management is of the view that the company must generate significant profits with a low tax burden. (Siregar & Widyawati, 2016).

The Influence Of Profit Management On Tax Avoidance With Company Size As A Moderation Variable

Company size is a measurement that is grouped based on the size of the company and can describe the company's activities and income. The bigger the company, the higher the profit generated. If the company's profit increases, the amount of tax the company will bear will also increase, which causes the risk of carrying out tax avoidance actions to be higher, which is reflected in the increasing BTD value. (Hitijahubessy dan Rusli, 2022).

The Effect Of Transfer Pricing On Tax Avoidance With Company Size As A Moderation Variable

Company size estimates the size of the company and whether tax avoidance can occur in small or large companies. When a company has a large size, it will generally be involved in transactions in a wider field of business, so there is a greater possibility that there will be inter-company transactions. This involves the possibility of companies implementing a transfer pricing strategy to plan their taxes. Companies with large sizes certainly have a large quantity of assets, this causes tax avoidance to occur through transfer pricing schemes to get low tax rates. (Nugraha dan Meiranto, 2015).

The Effect Of Capital Intensity On Tax Avoidance With Company Size As A Moderation Variable

Capital intensity is closely related to company investment and fixed assets. This shows that companies

that have larger fixed assets make relatively lower tax payments compared to companies that have fewer fixed assets (Budiadnyani, 2020). In this case, management can take advantage of depreciation of fixed assets to reduce the company's tax burden. Managers will invest the company's idle funds in the form of fixed assets, with the aim of utilizing depreciation as a reduction in the tax burden. So the company's performance will increase due to a reduction in the tax burden, and the desired manager performance compensation will be achieved. (Adnyani & Astika, 2019).

METHOD

This research is a type of quantitative research. Data was obtained from the Indonesian Stock Exchange (www.idx.co.id). In this research, data was collected using documentary collection techniques. The observation period for this research was 5 years (2018-2022). The population of this research was all manufacturing companies. There are 163 companies listed on the Indonesian Stock Exchange (BEI). The sampling technique in this research was taken by purposive sampling and then from these results a sample of 26 companies was obtained. The sample criteria used by researchers were as manufacturing companies listed sequentially on the Indonesian stock exchange for the period 2018-2022 (193), companies that do not have subsidiaries abroad (148), companies that do not contain complete information required by researchers (10). The measurements used to measure the variables tax avoidance, earnings management, transfer pricing, capital intensity and company size are as tax avoidance uses the BTD proxy, transfer pricing uses the proxy for related party receivables, capital intensity uses the fixed assets proxy divided by total assets, company size uses the natural logarithm proxy.

RESULTS AND DISCUSSION

Descriptive Statistics					
	N	Minimu m	Maximu m	Mean	Std. Deviation
penghindaran pajak	210	-,96	,29	-,0061	,08424
manajemen laba	210	-,01	,01	,0003	,00194
traansfer pricing	210	-,16	,95	,2360	,26913
capital intensity	210	,02	,96	,3840	,17860
ukuran perusahaan	210	27,48	33,73	30,0965	1,54642
Valid N (listwise)	210				

Source: Data processed using SPSS 25, 2024

NORMALITY TEST

One-Sample Kolmogorov-Smirnov Test			Unstandardized Residual
N			210
Normal Parameters ^{a,b}	Mean		-.0054966
	Std. Deviation		.02133951
Most Extreme Differences	Absolute		.075
	Positive		.072
	Negative		-.075
Test Statistic			.075
Asymp. Sig. (2-tailed)			.006 ^c
Monte Carlo Sig. (2-tailed)	Sig.		.171 ^d
	99% Confidence Interval	Lower Bound	.161
		Upper Bound	.180

a. Test distribution is Normal.

b. Calculated from data.

c. Lilliefors Significance Correction.

d. Based on 10000 sampled tables with starting seed 957002199.

Source: Data processed using SPSS 25, 2024

The results of statistical tests using numbers. Sig < 0.05, namely 0.171. Shows that all data Kolmogorov-Smirnov values are seen in Monte Carlo is normally distributed.

MULTICOLINIARITY TEST

Coefficients ^a								
Model	Unstandardized Coefficients		Standardized Coefficients Beta	t	Sig.	Collinearity Statistics		
	B	Std. Error				Tolerance	VIF	
1	(Constant)	.015	.109	.137	.891			
	DAC	15.852	2.803	.366	5.656	.000	.976	1.024
	TP	-.070	.020	-.223	-3.437	.001	.971	1.030
	CI	.031	.031	.066	1.012	.313	.966	1.035
	LN	-.001	.004	-.013	-.203	.839	.971	1.029
a. Dependent Variable: BTD								

Source: Data processed using SPSS 25, 2024

Based on the test results in the table above, the tolerance figure proves that the value is > 0.10. The VIF results for all variables have a value < 10. The test obtained is categorized as reliable and effective in various developments arising from other variables, due to the absence of symptoms of multicollinearity.

HETEROSCEDACITY TEST

Correlations							
Spearman's rho	DAC					Unstandardized Residual	
		Correlation Coefficient	DAC	TP	CI	LN	
		Sig. (2-tailed)	1.000	.154 [*]	-.064	-.050	-.016
				.026	.358	.469	.817
		N	210	210	210	210	210
	TP	Correlation Coefficient	.154 [*]	1.000	.093	-.009	-.020
		Sig. (2-tailed)	.026		.180	.895	.769
		N	210	210	210	210	210
	CI	Correlation Coefficient	-.064	.093	1.000	-.096	-.100
		Sig. (2-tailed)	.358	.180		.164	.148
		N	210	210	210	210	210
	LN	Correlation Coefficient	-.050	-.009	-.096	1.000	.019
		Sig. (2-tailed)	.469	.895	.164		.786
		N	210	210	210	210	210
	Unstandardized Residual	Correlation Coefficient	-.016	-.020	-.100	.019	1.000
		Sig. (2-tailed)	.817	.769	.148	.786	.335
		N	210	210	210	210	210

*. Correlation is significant at the 0.05 level (2-tailed).

Source: Data processed using SPSS 25, 2024

unstandardized residual Sig. (2-tailed) produces a significance value for each independent variable, namely Profit Management, transfer pricing, capital intensity, and company size greater than 0.05, so it is concluded that there is no heteroscedasticity problem in the regression model.

AUTOCORRELATION TEST

Model Summary^b

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate	Durbin-Watson
1	,405 ^a	,164	,148	,07778	1,554

a. Predictors: (Constant), LN, TP, DAC, CI

b. Dependent Variable: BTD

Source: Data processed using SPSS 25, 2024

Durbin-Watson (DW) is 1.554 with the amount of data (n) = 210, k = 4 (number of independent variables) obtained $du = 1.4341$. So $4 - du = 4 - 1.7678 = 2.445$. Based on the recapitulation, the

results were $1.4341 < 1.554 < 2.445$. The conclusion is that if $du < d < 4 - du$ it means that there is no positive or negative autocorrelation or no symptoms of autocorrelation.

MULTIPLE LINEAR REGRESSION ANALYSIS

Coefficients^a

Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	-,007	,013		-,532	,596
	DAC	15,895	2,788	,367	5,701	,000
	TP	-,070	,020	-,223	-3,453	,001
	CI	,032	,030	,068	1,058	,291

a. Dependent Variable: BTD

Source: Data processed using SPSS 25, 2024

Regression Models:

$$Y = a + \beta_1 X_1 + \beta_2 X_2 + \beta_3 X_3 + e$$

$$\text{Tax Avoidance} = -0.007 + 15.895 + -0.070 + 0.032 + e$$

DETERMINATION COEFFICIENT

Model Summary

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	,405 ^a	,164	,151	,07759

a. Predictors: (Constant), CI, DAC, TP

Source: Data processed using SPSS 25, 2024

The adjusted R square in this research model is 0.164 or 16.4%, which means that earnings management ability, transfer pricing and capital

intensity and company size influence tax avoidance by 16.4%, while the rest is influenced by other variables not included in this research.

ANOVA^a

Model		Sum of Squares	df	Mean Square	F	Sig.
1	Regression	,243	3	,081	13,436	,000 ^b
	Residual	1,240	206	,006		
	Total	1,483	209			

a. Dependent Variable: BTD

b. Predictors: (Constant), CI, DAC, TP

Source: Data processed using SPSS 25, 2024

It can be seen that the Fcount value is 13.436 and the significance value is 0.000. Meanwhile, the Ftable value is 2.68. Because the value of Fcount > Ftable and the significance value < 0.05, H0 is rejected

and H1 is accepted that the independent variables, namely earnings management, transfer pricing and capital intensity jointly influence the independent variable, namely tax avoidance.

T TEST

Coefficients^a

Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	-,007	,013		-,532	,596
	DAC	15,895	2,788	,367	5,701	,000
	TP	-,070	,020	-,223	3,453	,001
	CI	,032	,030	,068	1,058	,291

a. Dependent Variable: BTD

Source: Data processed using SPSS 25, 2024

Based on the t test results, the results of this research can be concluded as follows:

1. Profit Management against Tax Avoidance

Based on table, it can be seen that earnings management has t count of 5.701, compared to ttable of 1.65714, then tcount > ttable and the significance level is 0.000, then the sig value. < 0.05. This matter means H0 is rejected and H1 is accepted, the earnings management variable has a positive significant impact on tax avoidance.

2. Transfer Pricing against Tax Avoidance

Based on table above, it can be seen that transfer pricing has a t count of 3.453, compared to t

table of 1.65714, so t count > t table and the significance level is 0.001, so the sig value < 0.05. This means that H0 is rejected and H1 is accepted, the transfer pricing variable has a significant positive effect on tax avoidance.

3. Capital Intensity towards Tax Avoidance

Based on table, it can be seen above that capital intensity has a tcount of 1.058 compared to a ttable of 1.65714, so tcount < ttable and the significance level is 0.291, so the sig value. > 0.05. This means that H0 is accepted and H1 is rejected, the capital intensity variable has no effect and is not significant on tax avoidance.

MODERATED REGRESSION ANALYSIS (MRA)

Coefficients^a

Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.
		B	Std. Error	Beta		
1	(Constant)	,097	,222		,438	,662
	DAC	-187,667	71,544	-,4328	-2,623	,009
	TP	,012	,034	,038	,347	,729
	CI	,087	,590	,185	,148	,882
	LN	-,003	,007	-,060	-,448	,654
	DACxLN	6,840	2,411	4,676	2,837	,005
	TPxLN	-,004	,002	-,293	2,704	,007
	CIxLN	-,002	,020	-,122	-,099	,921

a. Dependent Variable: BTD

Source: Data processed using SPSS 25, 2024

The Moderated Regression Analysis regression equation is as follows:

$$\text{LnY} = a + \beta_1 X_1 + \beta_2 X_2 + \beta_3 X_3 + \beta_4 Z + \beta_5 X_1 * Z + \beta_6 X_2 * Z + \beta_7 X_3 * Z + e$$

$$\text{Tax Avoidance} = 0.097 + -187.667 + 0.012 + 0.087 + -0.003 + 6.840 + -0.004 + -0.002 + e$$

DISCUSSION

The Influence of Earnings Management on Tax Avoidance

The results of the regression analysis show that the earnings management variable has a calculated t value $>$ from t table of $5.701 > 1.65714$ with a significance level lower than 0.05, namely 0.000. These results indicate that earnings management influences Tax Avoidance in manufacturing companies listed on the IDX (H1 is accepted). Based on this, the researcher concludes that earnings management as proxied by Discretionary Accruals has a positive effect on Tax Avoidance, and it can be interpreted that during the observation period, there is a tendency for companies to carry out income decreasing or minimize profits as an effort to avoid tax, where the greater the income reduction carried out by company then the company is also indicated to be committing tax evasion. The results of this research support the results of research conducted by Novitasari (2017), which shows that earnings management has a significant influence on Tax Avoidance. However, this research does not support the results of Amril's (2015) research which shows that earnings management has no effect on Tax Avoidance.

The Effect of Transfer Pricing on Tax Avoidance

The results of the regression analysis show that the Transfer Pricing variable has a calculated t of 3.453 $>$ t table of 1.65714 with a significance level lower than 0.05, namely 0.001. These results indicate that Transfer Pricing influences Tax Avoidance in manufacturing companies listed on the IDX (H2 is accepted). Transfer pricing practices are often used by multinational companies in order to minimize the tax burden that must be paid. Transfer pricing practices are usually carried out by selling goods and services below market prices within one group and transferring their profits to groups domiciled in countries that apply lower tax rates. The higher a country's tax rate, the greater the possibility of companies engaging in tax avoidance, because taxes for companies are seen as a burden that will reduce profits. The results of this research strengthen the research results of Amidu et al (2018). However, this research is not in line with the research of Loven et al (2022) that transfer pricing has no effect on tax avoidance.

The Effect of Capital Intensity on Tax Avoidance

The results of the regression analysis show that the Capital Intensity variable has a calculated t value of 1.058 which is smaller than the t table value of 1.65714 with a significance level higher than 0.05, namely 0.291. These results indicate that Capital Intensity has no effect on Tax Avoidance in manufacturing companies listed on the BEI (H3 is rejected). capital intensity (investment in fixed assets) cannot be used as a reference for avoiding high taxes (tax avoidance). The author concludes that one component of reducing profits is depreciation expense, the higher the depreciation of fixed assets, the lower the profit. This research is unable to psrove that fixed asset investment in manufacturing companies has an effect on tax avoidance. The results of this research are in line with research by Windaswari and Merkusiwati (2018), while research conducted by Nyoman Budhisetya (2017) and Nawang Kalbuana (2020) shows that capital intensity has an inverse effect on tax avoidance.

The Role of Company Size in Moderating Profit Management on Tax Avoidance

The results of this research show that the results of the earnings management test on Tax Avoidance moderated by company size have a calculated t value of 2.837 $>$ t table of 1.65714 and a sig value of 0.005 which means it is smaller than 0.05. From these results it can be proven that H4 is accepted. From these results the author concludes that the larger the company, the higher the taxes imposed, therefore management will report lower profits or manipulate financial reports to reduce the tax payments imposed to avoid being charged high taxes. The results of this research are in line with research by (Amah et al., 2022), while research conducted by (Diatmika & Sukartha, 2019) has different results, namely that company size does not influence earnings management on Tax Avoidance.

The Role Of Company Size In Moderating Transfer Pricing On Tax Avoidance

The results of this research show that the results of the Transfer Pricing test on Tax Avoidance moderated by company size have a calculated t value of 2.704 $>$ t table of 1.65714 and a sig value of 0.007 which means it is smaller than 0.05. From these results it can be proven that H5 is accepted. Company size estimates how large or small the company is and whether tax avoidance can occur in small or large

companies. When a company has a large size, it will generally be involved in transactions in a wider field of business so that there is a greater possibility that there will be inter-company transactions. This involves the possibility of companies implementing a transfer pricing strategy to plan their taxes. Companies with large sizes certainly have a large quantity of assets, this causes tax avoidance to occur through transfer pricing schemes to get low tax rates. The results of this research are in line with research conducted by Previous research conducted by (Komara et al., 2022) while research conducted by (Panjalusman et al., 2018) shows that company size weakens transfer prices against tax avoidance.

The Role Of Company Size In Moderating The Effect Of Capital Intensity On Tax Avoidance

The results of this research show that the results of the Capital Intensity test on Tax Avoidance moderated by company size have a calculated t value of $-0.099 < t$ table of 1.65714 and a sig value of 0.921 which means it is greater than 0.05. From these results it can be proven that H6 is rejected. The results of this research are not in line with agency theory. The justification can explain that company size does not strengthen the influence of Capital Intensity on tax avoidance. Company size is not the most important factor for practicing tax avoidance, especially in large companies that require large amounts of fixed assets to support them. operational activities, apart from the data in this research, the average company only has fixed assets of less than 50%. This is also what makes capital intensity not a reason for tax avoidance. The results of this research are in line with research conducted by Viona Komara, Kurniawan and Hendrian Yonata (2019). On the other hand, this research does not support the research results of Saputra, et al (2020) that company size can be interacted with on the effect of capital intensity on tax avoidance.

CONCLUSION

This research analyzes manufacturing companies listed on the BEI in 2018-2023, in this case showing that profit management has an effect on tax avoidance. and transfer pricing has an influence on tax avoidance. capital intensity has no influence on tax avoidance. For the variable company size, it can moderate the relationship between earnings management and tax avoidance. and company size can moderate the relationship between transfer pricing and

avoidance, company size cannot moderate the relationship between capital intensity and tax avoidance. From the results of this research, there are several limitations, namely the coefficient of determination by the independent variables that researchers use, namely profit management, transfer pricing, capital intensity and company size is only 16.4%. This indicates that there are other variables that were not tested in this research that have a greater influence on tax avoidance and this research only uses manufacturing companies which focus on companies that have subsidiaries or branches overseas so the sample used in this research is only 210 data. company and year used 6 years ago.

Suggestions for further research are that it is hoped that this research can become a reference for further research. It is hoped that future research will add, replace, or develop research variables that were not tested in this research and 2. Future researchers are expected to be able to expand the research by adding research periods and also company samples so that they can obtain better research results.

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